

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION**

**MEETING OF APRIL 13 - 14, 2011
South Lake Tahoe**

ITEM: 4

**SUBJECT: REVISED WASTE DISCHARGE REQUIREMENTS FOR
CAMP PENDLETON & QUANTICO HOUSING LLC/LINCOLN
MILITARY HOUSING AND UNITED STATES MARINE CORPS
MOUNTAIN WARFARE TRAINING CENTER COLEVILLE
HOUSING WASTEWATER TREATMENT AND DISPOSAL
FACILITY, MONO COUNTY**

CHRONOLOGY:

November 14, 1985	Water Board Order No. 6-85-129 adopted, WDRs for the Coleville Community onsite septic disposal system.
March 14, 2001	Water Board Order No. 6-01-11 adopted to update the WDRs.
July 26, 2010	A Report of Waste Discharge was submitted proposing secondary treatment.
September 13, 2010,	Supplemental information to complete the Report of Waste Discharge was submitted.

ISSUES:

1. Should the Water Board adopt Revised Waste Discharge Requirements (WDRs) that includes Certifying a Negative Declaration for the Camp Pendleton & Quantico Housing LLC/Lincoln Military Housing (Discharger) and United States Marine Corps Mountain Warfare Training Center Coleville Housing Wastewater Treatment and Disposal Facility, Mono County?
2. Should the Water Board adopt the Proposed Revised WDRs with two property owners in the area having provided comments opposing the Tentative WDRs?

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DISCUSSION:

The Discharger has proposed to replace existing wastewater treatment and disposal facilities at the Mountain Warfare Training Center Coleville Housing (Facility) to accommodate existing flows and up to 11,000 gallons per day of new flows from a child development center, a commissary, mini mart, and four existing unoccupied homes (currently used as the child development center). The current onsite wastewater disposal system is a community septic system with subsurface disposal. The Discharger has proposed to construct an extended aeration wastewater treatment facility designed to meet secondary wastewater treatment standards, and includes a nitrogen removal system that will reportedly achieve an average nitrate discharge of less than 10 mg/l as nitrogen.

The Facility has three ground water monitoring wells that have been consistently sampled since 2004. The wells were surveyed while the proposed WDRs were being produced and ground water gradients were determined. The ground water gradients were not as expected and additional ground water monitoring wells must therefore be installed pursuant to the proposed Order to improve monitoring of the ground water under the conditions at the Site.

The proposed Board Order certifies a Negative Declaration (see Enclosure 3) pursuant to the California Environmental Quality Act for the entire wastewater project that includes the improvements that will discharge to the improved wastewater treatment and disposal system, the modifications to the storm water onsite drainage system, and improvements to the potable water infrastructure. The Negative Declaration was circulated for agency and public comment as required on January 24, 2011. No comments were received. The monitoring and reporting program in the proposed Order requires the Discharger to submit reports on a number of items to demonstrate compliance with Negative Declaration conditions of approval to ensure that impacts will be less than significant. Adoption of the proposed Order is also certification of the Negative Declaration.

In summary, the proposed project will increase the rate and volume of the discharge and increase the quality of the discharge, which will reduce the waste loads (mass) delivered to the local ground water. The monitoring and reporting program will also increase ground water monitoring for adverse conditions from the disposal practice.

Comments were solicited on tentative WDRs and a public notice was published in the Sierra Scoop on March 1, 2011. Changes to the tentative WDRs are addressed in the cover letter mailed out to interested parties with the proposed Order. Staff received comment letters (enclosed) in opposition to the proposed Order. Staff met with one of the concerned individuals near the Facility and responded to Public Records Act request for information. Staff has provided written responses to the comments in opposition to the proposed order. Our responses to the written comments are also enclosed.

RECOMMENDATION:

Adopt the Order as proposed, including certification of the Negative Declaration.

Enclosures:

1. Fact Sheet
2. Proposed Board Order
3. Negative Declaration (SCH # 2011012057).
4. Discharger comments on tentative WDRs (dated February 4, 2011).
5. Mr. Timothy Pemberton, Esq. comments on Tentative WDRs on behalf of the Coffron family (dated February 8, 2011).
6. Mr. David Robertson, Esq. comments on Tentative WDR on behalf of Schwake family (dated February 22, 2011).
7. Mr. Timothy Pemberton, Esq. second set of comments on behalf of the Coffron family (dated March 11, 2011).
8. Water Board Staff response to comments to Mr. Timothy Pemberton, Esq. (dated March 18, 2011).
9. Water Board Staff response to comments to Mr. David Robertson, Esq. (dated March 18, 2011).
10. Mr. Timothy Pemberton, Esq. third comment letter on behalf of the Coffron family (dated March 22, 2011).

ENCLOSURE 1

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION
FACT SHEET**

ITEM NO: 4

DISCHARGER NAME: Camp Pendleton & Quantico Housing LLC/Lincoln Military Housing and United States Marine Corps

FACILITY TYPE: Wastewater treatment and disposal site

PROJECT NAME: Mountain Warfare Training Center Coleville Housing Wastewater Treatment and Disposal Facility

WDID NO.: 6A268154101

LOCATION: West side of U.S. Highway 395, approximately one mile north of Coleville, Mono County

TYPE OF WASTE: Municipal domestic waste (sewage), and rinse water from drinking water filter media

PROGRAM: Waste Discharge Requirements (WDRs)

TREATMENT FACILITIES: Extended aeration for sewage, with an anoxic system to reduce nitrates and a filtration system prior to discharge. Infiltration for rinse water

DISPOSAL FACILITIES: Subsurface disposal and subsurface irrigation and infiltration

PRESENT FLOW: System design for sewage is for an average flow of 50,000 gallon a day; up to 100,000 gallons per rinse event for rinse water

RECEIVING WATERS: Ground waters of the Antelope Valley

BENEFICIAL USES: Ground waters – Municipal and domestic supply (MUN)
Agricultural (AGR)
Freshwater replenishment (FRSH)

CEQA COMPLIANCE: Water Board, Negative Declaration (SCH # 2011012057) in Order.

LANDOWNER: United States Marine Corps

NEARBY DEVELOPMENT: Rural Residential housing, agriculture, roadway

NATURE OF AREA: River valley at the base of the Sierra-Nevada Mountains

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ENCLOSURE 2

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION

Board Order No. R6T-2011-(PROPOSED)
WDID 6A268512900

REVISED WASTE DISCHARGE REQUIREMENTS

For

CAMP PENDLETON & QUANTICO HOUSING LLC/LINCOLN MILITARY HOUSING
AND UNITED STATES MARINE CORPS
MOUNTAIN WARFARE TRAINING CENTER COLEVILLE HOUSING
WASTEWATER TREATMENT AND DISPOSAL FACILITY

MONO COUNTY

The California Regional Water Quality Control Board, Lahontan Region (Water Board) finds:

1. Discharger

Camp Pendleton & Quantico Housing LLC./Lincoln Military Housing (Discharger) is the current owner and operator of a wastewater treatment and disposal facility that serves military personnel and their families at the Mountain Warfare Training Center (MWTC) housing area near Coleville and will be the owner and operator of the proposed wastewater treatment and disposal facility (Facility) described in Finding No. 5, below. The United States Department of the Navy, United States Marine Corps is the owner of the land where the Facility is located. For the purposes of this Order the Camp Pendleton & Quantico Housing LLC./Lincoln Military Housing is the "Discharger." As landowner, the US Department of the Navy, US Marine Corps is considered a legally-responsible person under this Order if the Discharger fails to comply with orders of the Water Board.

2. Location and Existing Wastewater System

The wastewater treatment and disposal system is located in Antelope Valley on the west side of U.S. Highway 395, approximately one mile north of Coleville, within the NW ¼ of Section 36 T9N, R22E, MDB&M as shown on Attachment "A," which is made a part of this Order.

The wastewater treatment and disposal system (existing Facility) is currently a large community septic system. The system consists of four 7600-gallon septic tanks with four 900-gallon dosing chambers and two leachfield areas. The two leachfield areas cover roughly 68,900 square feet and the flow is manually directed via opening gate valves to cycle the discharge to the two leachfields.

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3. Reason for Action

The Discharger filed a Report of Waste Discharge dated July 2010 to upgrade the wastewater facilities to allow for the existing flows and to accommodate new flows from a child development center, a commissary, mini mart, and four existing unoccupied homes (currently used as the child development center). The child development center, commissary and mini mart will contribute to the total wastewater flow. The existing flow with the additional new flow will result in an amount of discharge that would exceed the requirements typically applied by the Water Board for disposal from septic systems, a standard rate of 500 gallons per acre per day. The entire development is approximately 68.5 acres so the average daily flow should be less than 34,250 gallons a day based on treatment in a septic system.

There are indications the existing system is approaching its capacity and needs upgrading (nitrate concentrations in down gradient wells have been higher than the up gradient well and could be attributed to the current disposal). The Discharger has proposed a new Facility to increase the treatment capabilities to discharge up to 50,000 gallons per day by improving the quality of the discharge and increasing the wastewater disposal area.

4. History of Previous Regulation by the Water Board

The Water Board previously established waste discharge requirements for domestic wastewater disposal from the MWTC housing area under Board Order No. 6-01-11, which was adopted on March 1, 2001. Board Order No. 6-01-11 was preceded by Board Order No. 6-85-129, adopted on November 14, 1985.

5. Proposed Facility and Discharge

The Discharger is proposing to use a pre-manufactured "package" activated-sludge wastewater treatment plant designed to remove 90% of the Biochemical Oxygen Demand (BOD) and achieve concentrations of 30 milligrams per liter (mg/l) for BOD and 30 mg/l for total suspended solids (TSS). For the purposes of this Order, this system will be termed the proposed Facility (in contrast to the existing Facility). The design also includes processing for enhanced removal of nitrogen. The proposed Facility treatment system includes bar screens for solids and grit removal, a flow equalization tank, an anoxic tank, and aeration tank, clarifier, sludge digester, filter pumps, pressure filters, and a clear well prior to discharge/disposal. The treatment plant flow diagram is shown in Attachment "B."

The proposed Facility's disposal areas will consist of two areas, the existing leachfield area, termed the low-pressure disposal area will be rehabilitated by having its piping replaced and drain rock inspected and replaced as needed. A second

disposal area consists of a below-grade infiltration chamber (the Discharger's Report of Waste Discharge nomenclature or term for this portion of the proposed Facility was "below-grade infiltration basin"), and subsurface irrigation areas located above the low-pressure disposal area and above the below-grade infiltration chamber.

The below-grade infiltration chamber is a new disposal area. The infiltration chamber will be constructed adjacent to the housing area's storm water retention basin. The infiltration chamber will consist of several 48-inch-diameter, high-density polyethylene perforated pipes, laid in rows with two feet of horizontal separation. The side of the below-grade infiltration chamber adjacent to the storm water retention basin will have a 30-mil impermeable synthetic liner that will be buried and installed between the edge of the infiltration chamber and the storm water retention basin. The synthetic liner will be installed to prevent lateral water migration of wastewater and surfacing effluent in the storm water retention basin. The pipes will be buried in drain rock and then covered with filter fabric and topsoil.

Subsurface irrigation areas will be installed in the soil 12-18 inches below grade above the infiltration basin and the low pressure disposal area.

6. Sludge Disposal

The proposed Facility will include an aerobic digester. Some of the sludge in the digester will be used as a biological seed in the flow equalization tank but the sludge digester will mainly be used to further reduce the sludge volume and mass. Sludge will need to be periodically removed and hauled away for disposal. The digester is not an authorized disposal location. The Discharger will maintain records on the sludge removed and where it was disposed of under the terms of this Order.

7. Water Supply System

In addition to the sewage-wastewater disposal, this Order also regulates the disposal of rinse water from the drinking water treatment system. The drinking water treatment system is for arsenic removal from the ground water. There are three ground water wells that provide drinking water and all three wells must be treated for arsenic to meet the drinking water standards.

The drinking water treatment system consists of two filtration units operated in series. The filter contains an iron-based proprietary granular media, which has an affinity for arsenic, iron and other metals. Rinse water is generated during the initial rinse of new filter media to remove fine particles that are produced by abrasion when the media is transported and installed. The rinsing process produces an estimated total of 60,000 -70,000 gallons of rinse water when new media is installed in both filters. The installation of new filter media and rinsing occur four to six times every 12 months. The following is the expected quality range of the rinse water.

<u>Parameter</u>	<u>Units</u>	<u>Range</u>
pH	pH ¹	7-9
Total Dissolved Solids	mg/l ²	500 -1000
Specific Conductance	µmho/cm ³	700 -1400
Turbidity	NTU ⁴	0.60 -75

1 pH is a measure of hydrogen ion concentration

2 mg/l -milligrams per liter

3 µmho/cm -micromhos per centimeter

4 NTU -Nephelometric turbidity unit

The Discharger will dispose of the rinse water from the drinking water treatment system into the soil within the site's storm water retention basin (Basin). The current Basin has ample storage for the discharge. The Basin will be reconfigured with the construction of the proposed Facility and will have the same volume capacity as the current Basin (237,000 cubic feet) after modifications. The Basin will still have the capability of handling large storm events, and as a management practice for the rinse water, discharge will not occur when standing water from storms is in the Basin. Rinse water may also be dispersed by way of infiltration systems for the proposed Facility, at the Discharger's discretion without going through the Facility treatment processes.

8. Authorized Disposal Area

The authorized disposal area for treated wastewater is any area within the low-pressure infiltration area (this area includes the existing leach field), the buried infiltration chamber, and the two subsurface irrigation areas directly above these two disposal area that are shown in Attachment "C," which is made a part of this Order.

The authorized disposal area for rinse water from the new filter media from the drinking water treatment system is the existing or proposed-modified Basin, or the above described sewage wastewater disposal areas.

9. Schedule and Proposed Facility Start Up

The proposed Facility construction is planned to begin as early as March 2011 and the current plan is to complete the upgrades by the summer of 2012.

A new wastewater treatment plant may take several weeks to months after start up to get all of the operations working before effluent limits are attained regularly.

Water Board staff will monitor any effluent limit violations and consider the seriousness of the violation, the ability of the Discharger to avoid the violation, and the threat to water quality, prior to making recommendations on formal enforcement during the several initial months of the proposed Facility operation.

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10. Site Geology

The Facility is built on glacial deposits generally regarded as permeable. The underlying geology at the site consists of a relatively thin alluvial deposit underlain by weathered and fractured granitic and metamorphic bedrock material. The percolation rates recorded for the existing leachfields are approximately 3.3 inches per day (436 minutes per inch as reported in the wastewater study for the Marine Corps Mountain Warfare Training Center Coleville Housing Colville, MacDonald-Stephens Engineers, Inc., November 1996).

The Discharger conducted additional investigation on the soil percolation and provided the information in the Report of Waste Discharge dated July 2010. The test results showed that the percolation rates in the proposed new subsurface disposal area(s) are much higher, for example a percolation rate of 55 inches per day. For design purposes, the Discharger used a percolation rate of 3.3 inches per day.

11. Site Hydrology

Annual precipitation for the area is estimated at 10 inches. Surface runoff from offsite and onsite areas of the housing development is collected and transported by storm drains and concrete-lined drainage channels that flow into the Basin, located near the northeast corner of the Facility. Discharges from the basin in overflow conditions enter a culvert on the west side of U.S. Highway 395 and flow into Alkali Ditch. Alkali Ditch is a tributary to the West Walker River on the east side of U.S. Highway 395, as shown on Attachment "D."

The storm water retention basin will be altered in configuration with construction of the proposed Facility, but the overall capacity to handle runoff from a 100-year, 24-hour storm event will not be altered.

12. Site Hydrogeology

The Facility currently has three active drinking water wells on the site located up gradient of the disposal area. In addition to the drinking water wells, the Facility has three monitoring wells located around the Facility to monitor the existing discharge. The locations of the existing monitoring wells are shown in Attachment "C." This Order requires installation of ground water monitoring systems and sampling to adequately monitor the discharges.

Based on the ground water gradient determined by a 2011 survey, the depth to ground water is greater than 50 feet for the proposed disposal area and over 70 feet below the current disposal area. The ground water gradients were not as would be expected and this order will require additional ground water monitoring wells.

Ground water is known to contain naturally-occurring arsenic and uranium, which

may be present above drinking water standards, which is why the water is treated prior to consumption.

13. Receiving Waters

The receiving waters are the ground waters of the Antelope Valley (Topaz Valley) Ground Water Basin (Department of Water Resources Basin No. 6-107).

14. Water Quality Control Plan

The Water Board adopted the *Water Quality Control Plan for the Lahontan Region* (Basin Plan), which took effect on March 31, 1995. This Order implements the Basin Plan.

15. Beneficial Uses of Ground Water

The beneficial uses of the ground waters of the Antelope Valley (Topaz Valley) Ground Water Basin, as set forth and defined in the Basin Plan are:

- a. municipal and domestic supply
- b. agricultural supply
- c. freshwater replenishment

16. Regulations for Wastewater Treatment and Disposal

Water Code section 13172 directed the State Water Resources Control Board (State Water Board) to write regulations for waste disposal sites to protect water quality "except for sewage treatment plants..." Those regulations are now incorporated in the California Code of Regulations (CCR) title 27 for waste disposal sites and surface impoundments. The planned Facility has a package wastewater plant for the treatment of the sewage that is statutorily exempt from CCR title 27. Regulation is appropriate for the package wastewater plant under CCR title 23.

The existing Facility discharges primary treated wastewater that receives anaerobic treatment in the septic tanks and additional aerobic treatment occurs in the leachfield. Since the leachfields are part of the treatment the entire leachfield disposal area, as part of the treatment system, is exempt from title 27 requirements. The proposed Facility will use the existing leachfields and other subsurface disposal methods to dispose of secondary treated wastewater. The subsurface disposal will provide some additional treatment to the effluent, but the amount of additional treatment is small in comparison to the proposed treatment system. Thus, the proposed disposal of the treated wastewater is not covered by the exemption contained in the statute.

In addition to the treated wastewater disposal, the Discharger discharges rinse water as wastewater from the drinking water system to the storm water retention and percolation Basin. This discharge is not exempt from Water Code section 13172.

17. California Code of Regulations (CCR)

The discharge or disposal of treated sewage and drinking water treatment system effluent is subject to CCR title 27 regulations, as follows. Section 20090(b) states the following three conditions that must be met for the discharge to be exempt from title 27 prescriptive requirements for waste containment.

"(b) Wastewater -Discharges of wastewater to land, including but not limited to evaporation ponds, percolation ponds, or subsurface leachfields if the following conditions are met:"

"(1) the applicable RWQCB has issued WDRs, reclamation requirements or waived such issuance;"

The Water Board has previously issued WDRs for the existing Facility and its discharges (wastewater and drinking water treatment system). The adoption of this Order will satisfy the condition for the proposed Facility and the continued water supply operations.

"(2) the discharge is in compliance with the applicable water quality control plan; and"

The applicable water quality control plan is the Basin Plan. The Order for the existing Facility includes a ground water monitoring program and associated data indicates the Facility has not impaired the water quality for designated beneficial uses. The proposed Facility will discharge effluent of much higher quality with only a small increase in the total flow. The water system discharges, on an ongoing intermittent basis, also meet conditions above for exemption from title 27 prescriptive requirements. The disposed effluent and method of disposal will be regulated in accordance with the Basin Plan. The Discharger is in compliance with the Basin Plan and will be required to continually demonstrate compliance with the Basin Plan by monitoring included in this Order.

"(3) the wastewater does not need to be managed according to Chapter 11, Division 4.5, Title 22 of this code as a hazardous waste."

The discharge does not meet the specified hazardous waste criteria.

In summary, the conditions for exemption to title 27 requirements will be met with the adoption of this order and WDRs that place ongoing requirements on the Discharger. The current discharge has not violated the Basin Plan, monitoring will continue to demonstrate that the discharge is in compliance with the Basin Plan, and the effluent is not a hazardous waste. Under these conditions, it is appropriate to regulate the disposal of wastewater solely under CCR title 23.

18. Policy for Maintaining High Quality Waters

State Water Board Resolution No. 68-16 requires the Lahontan Water Board, in regulating the discharge of waste, to *maintain existing high quality waters of the State until it is demonstrated that any change in quality will be consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial uses, and will not result in water quality less than that described in State or Regional Water Board policies; and require that any activity which produces or may produce a waste or increased volume or concentration of waste and which discharges or proposes to discharge to existing high quality waters must meet waste discharge requirements which will result in the best practicable treatment or control of the discharge necessary to assure that a pollution or nuisance will not occur and the highest water quality consistent with maximum benefit to the people of the State will be maintained.*

The Discharger will be increasing the total flow discharged to the subsurface. However, the water quality of the discharge will be improved by using the secondary and near-tertiary treatment technology to prevent a pollution or nuisance from occurring. The current discharge has an average biochemical oxygen demand (BOD) concentration of 262 mg/l and an average total suspended solids (TSS) concentration of 58 mg/l. The proposed treatment system should discharge BOD at less than 30 mg/l and TSS at less than 30 mg/l, and thus achieve over 80% reduction in current BOD loading and over 30% reduction in current TSS loading. The total net loading (pounds of materials) to the subsurface of BOD, TSS and other pollutants will be reduced by the improved treatment.

The discharge will also be over a larger area providing greater dispersal and disposal area cycling options for the Discharger. A portion of the time the discharge will be to a subsurface irrigation system. The discharge to the irrigation system will be in the root zone of plants that will take up nutrients such as nitrogen and phosphorus from the discharge.

In summary, the discharge will be of a better quality, actual subsurface loading of constituents will be reduced and the discharge area will be increased. Thus, the discharge will maintain the quality of existing high quality waters and will not unreasonably affect the current and future uses of the ground water for beneficial purposes.

19. Evaluation of Water Code Section 13241

Pursuant to Water Code section 13241 the requirements of this Order take into consideration:

(a) Past, present, and probable future beneficial uses of water.

The findings of this Order identify past, present and probable future beneficial uses of water, as described in the Basin Plan, that are potentially affected by the discharge. Present or probable future beneficial uses of the water, including municipal water supply, agricultural supply and freshwater replenishment will not be affected by the discharge, and will be maintained.

(b) Environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto.

The findings of this Order concerning geology, hydrogeology, and hydrology provide general information on the hydrographic unit potentially affected by the discharge. Water quality is generally suitable for beneficial uses, although the Discharger has to remove naturally-occurring arsenic from the ground water to meet drinking water standards to supply the community. The past ground water monitoring has shown some unusual nitrate concentrations at times in the ground water possibly attributable to ongoing discharges. However, the highest nitrate concentration detected since the Discharger has been monitoring has been 5.0 mg/l as N, and is below the drinking water Maximum Contaminant Level (MCL) standard of 10 mg/l for nitrate as N.

The proposed discharge will be a higher quality effluent with a lower total nitrogen level, and lower amounts of ammonia that could potentially convert to nitrate. The effluent sampled in March and April 2010 was found to have an average ammonia concentration of over 43mg/l as N which, in the air-rich subsurface, could quickly convert to nitrate. The proposed discharge will be aerated prior to disposal and is expected to have nitrate concentrations in the range of 5 mg/l, with low concentrations of ammonia that could convert to nitrate.

The Water Board has considered the environmental characteristics of the hydrographic unit, including the quality of water available.

(c) Water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area.

The ground water is assumed to be generally unaffected by waste discharges due to the isolated and remote location. All factors that could affect water quality in the area are being controlled in accordance with the Basin Plan policies. The nearest drinking water well has naturally-occurring arsenic above levels suitable for human consumption, and is controlled by treatment.

The Discharger currently monitors the ground water in the wastewater disposal area, which includes the area for drinking water treatment system discharges, and will be required to continue monitoring the ground water for pollutant increases associated with wastewater. In addition, the Discharger will begin monitoring the effluent from the proposed Facility treatment system

under this Order. Ground water quality will be maintained for its beneficial uses, consistent with coordinated controls for the area.

(d) Economic considerations

The proposed Facility is necessary to allow for the continued occupancy of the community and to allow for adequate water supply and sewage treatment with the proposed increase in flow rates associated with other proposed improvements. The Discharger has not indicated any economic hardship associated with the proposed Facility modifications.

(e) The need for developing housing within the region.

This project is in support of an existing housing facility for military personnel and their families, and is needed to support wastewater discharges from ancillary community services, including grocery shopping, and child care and development. The Discharger has determined the planned Facility modifications support existing and currently-planned service levels, and significant new housing is not anticipated. The Discharger provides a service to the US Marine Corps by managing the housing facility and the utility services for the housing. The existing Facility supports an existing housing development; the proposed Facility will provide support for placing four additional existing unoccupied houses into available housing. In addition, the current density of the development does not support allowing additional housing or support facilities that would increase the discharge based on existing treatment levels. This Order will support the existing and planned military housing and support facilities. This Order does not support developing new housing, but may prevent increased local demand in temporary housing in other locations than the existing housing area. Minimizing temporary housing demand assists in reducing the need to develop housing in the area.

(f) The need to develop and use recycled water

The proposed Facility will be using a portion of the discharge for subsurface irrigation above the two subsurface disposal fields. The subsurface irrigation system will be only 12 - 18 inches below the land surface. The subsurface irrigation will reduce the amount of potable water used to establish and maintain landscaping on top of the subsurface irrigation system. Based on available water supplies, there is not a demonstrated need at this time to develop the use of recycled water at the housing area beyond what is proposed.

20. California Environmental Quality Act Compliance

On January 24, 2011, the Water Board provided notice of intent to certify a negative declaration (SCH No. 2011012057) for the Coleville Military Family Housing Area Facility Improvements project. (Cal. Code Regs., tit. 14, § 15072.) The negative

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declaration reflects the Water Board's independent judgment and analysis. After considering the document and comments received during the public review process, the Water Board hereby determines that the proposed project will not have a significant effect on the environment. The negative declaration is hereby certified together with a program for monitoring and reporting on conditions of approval. The documents or other material, which constitute the record, are located at the Water Board's office at 2501 Lake Tahoe Boulevard, South Lake Tahoe CA 96150. The Water Board will file a Notice of Determination with the Office of Planning and Research within five working days from the issuance of this order.

This Order includes a monitoring and reporting program for project elements needed to assure effects of the project analyzed under CEQA will not be significant.

21. Notification and Consideration of Comments

The Water Board has notified the Discharger and interested parties of its intent to issue revised WDRs for the discharge and Facility. A notice of the availability of a draft order, and that a public meeting would be held to consider adoption of the order, was published/advertised in the Sierra Scope on March 1, 2011. The Water Board, in a public meeting on April 13, 2011 heard and considered all comments pertaining to the discharge. The Water Board has considered comments provided in accordance with applicable time limits.

IT IS HEREBY ORDERED, pursuant to Water Code sections 13260, 13263, and 13267 the Discharger must comply with the following:

I. **DISCHARGE FLOW LIMIT SPECIFICATIONS**

A. Flow Limit for Existing Facility

The maximum flow into the existing Facility must not exceed 39,000 gallons in a single day.

B. Flow Limits for Proposed Facility

The proposed Facility must have the flow meter or other means to determine the flow that will be discharged to the disposal fields. The flow measurement must be located just past the last portion of the treatment after the tertiary filters.

1. The Discharger must monitor the discharging flow from the Facility to the disposal locations. The discharge of treated wastewater must not exceed a monthly average flow rate of 50,000 gallons per day, where the monthly average flow rate is computed based on daily flow volumes.
2. The maximum flow into the Facility equalization tank must not exceed 90,000 gallons in a single 24-hour period.

C. Flow Limits for Filter Rinse

The maximum flow from the filter rinse water system to the authorized disposal areas during a 24-hour period must not exceed 100,000 gallons (0.100 million gallons).

II. **DISCHARGE EFFLUENT LIMITS**

A. Effluent Limits for the existing Facility – Not Applicable

B. Effluent Limits for the proposed Facility

1. The wastewater discharged from the proposed Facility to the authorized disposal area must not exceed the following limits.

Parameter	Units	Mean ¹	Maximum ²
BOD ³	mg/l	30	45
Suspended Solids	mg/l	30	45
Nitrate	mg/l as N	10	---

1. The mean is the monthly mean.
2. Maximum is the instantaneous maximum.
3. BOD means Biochemical Oxygen Demand.

2. The wastewater discharged to the authorized disposal areas must not have a pH lower than 6 or greater than 9. However, a pH over 9 resulting from a biological process and not due to a chemical addition may be allowed.

III. **RECEIVING WATER LIMITS**

The discharge of waste from the existing or proposed Facility and the drinking water treatment system must not cause the presence of the following substance or conditions in the ground waters of the Antelope Valley (Topaz Valley) Ground Water Basin or surface waters of the West Walker River Hydrologic Unit.

- A. Any perceptible color, odor, taste or foaming.
- B. Coliform organisms attributable to human wastes.
- C. Chemical Constituents – Waters designated as MUN must not contain concentrations of chemical constituents in excess of the MCL or Secondary MCL (SMCL) based upon drinking water standards specified in the following provisions of CCR, title 22: Table 64431-A of Section 64431 (Inorganic Chemicals), Table 64431-B of Section 64431 (Fluoride), Table 64444-A of Section 64444 (Organic Chemicals), Table 64449-A of Section 64449 (SMCLs – Consumer Acceptance Limits), and Table 64449-B of Section 64449 (SMCLs – Consumer Acceptance Ranges). This incorporation-by-

reference is prospective including future changes to the incorporated provisions as the changes take effect.

Waters designated as AGR must not contain concentrations of chemical constituents that adversely affect the water for beneficial uses (e.g., agricultural purposes).

Waters must not contain concentrations of chemical constituents that adversely affect the water for beneficial uses.

- D. Radioactivity – Waters designated as MUN must not contain concentrations of radio nuclides in excess of limits specified in CCR, title 22, section 64442, Table 64442, and section 64443, Table 64443, including future changes as the changes take effect.
- E. Taste and Odors – Waters must not contain taste or odor-producing substances in concentrations that cause a nuisance or that adversely affect beneficial uses. For waters designated as MUN, at a minimum, concentrations must not exceed adopted SMCLs specified in Table 64449-A of section 64449 (SMCLs – Consumer Acceptance Limits) and Table 64449-B of section 64449 (SMCLs – Consumer Acceptance Ranges) of CCR, title 22, including future changes as the changes take effect.
- F. Color – Waters must not contain color-producing substances from tracers in concentrations that cause a nuisance or that adversely affect beneficial uses.
- G. Toxicity – All waters must be maintained free of toxic substances in concentrations that individually, collectively, or cumulatively cause a detrimental physiological response in human, plant, animal, or aquatic life is prohibited.

IV. GENERAL REQUIREMENTS AND PROHIBITIONS

- A. The discharge of wastewater, except to the authorized disposal areas, is prohibited.
- B. The discharge, bypass, or diversion of raw or partially treated sewage, sewage sludge, grease, or oils from the collection, transport, treatment, or disposal facilities to adjacent land areas or surface waters is prohibited.
- C. The discharge must not cause a pollution as defined in section 13050 of the Water Code, or a threatened pollution.
- D. Neither the treatment nor the discharge must cause a nuisance as defined in section 13050 of the Water Code.
- E. The discharge of waste to surface waters is prohibited.
- F. Surfacing effluent or visible discharge of treated sewage from the authorized disposal area to adjacent land or surface waters is prohibited.

- G. Sludge generated at the Facility may not be disposed of at the Facility, but must to be taken to a location authorized to receive and dispose of the sludge.
- H. The Discharger must comply with the CEQA conditions of approval hereby incorporated into this Order as Attachment 5 of the Monitoring and Reporting Program No. 2011-(Proposed).

V. PROVISIONS

A. Standard Provisions

The Discharger must comply with the "Standard Provisions for Waste Discharge Requirements," dated September 1, 1994, in Attachment "E" which is made part of this Order.

B. Special Provisions for Water Supply System Wastes

1. Discharge of wastewater to the storm water retention Basin is limited to storm water, runoff and drainage, and rinse water discharged from rinsing of new water treatment filter media (rinse water).
2. Discharge of co-mingled storm water runoff and rinse water from the Basin to surface waters is prohibited.
3. Rinse water must be applied to the Basin only when there is no standing water present prior to the discharge, and adequate time is allowed for the rinse water to percolate into the soil prior to storms or other runoff events tributary to the Basin.
4. Discharge of rinse water from the Basin is prohibited.
5. The Basin outlet must be constructed, maintained and or controlled to prevent the discharge of rinse water from the Basin.

C. Monitoring and Reporting Program

A monitoring and reporting program (MRP) is necessary to verify compliance with requirements. Pursuant to Water Code section 13267, subdivision (b), the Discharger must comply with MRP No. 2011-(Proposed) as specified by the Water Board Executive Officer.

2. The Discharger must comply with the Sludge Management Plan required in the MRP upon acceptance by the Water Board Executive Officer.
3. By October 1, 2011, the Discharger must propose, install and maintain adequate monitoring systems for ground water monitoring as directed by the Executive Officer.

4. **Special Provisions Construction Inspection:** Upon acceptance by the Executive Officer, the Discharger must comply with the construction inspection program specified in the MRP.

D. Operator Certification

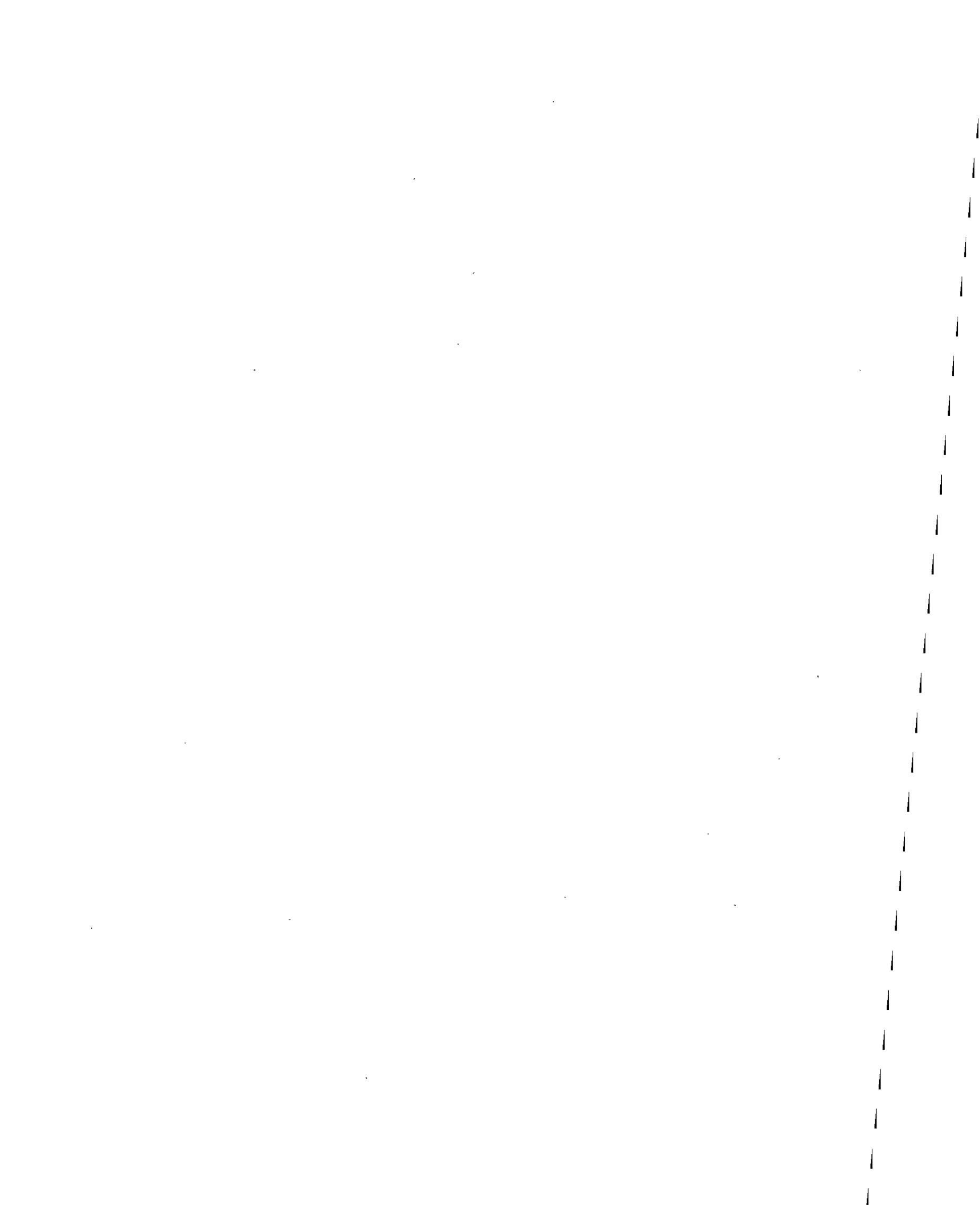
The Discharger's wastewater treatment plant must be supervised by personnel possessing wastewater treatment plant operation certificate of the appropriate grade pursuant to the California Code of Regulations, title 23, division 3, chapter 26.

I, Harold J. Singer, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Lahontan Region, on April 13, 2011.

HAROLD J. SINGER
EXECUTIVE OFFICER

- Attachments:
- A. Location Map
 - B. Treatment Plant Flow Diagram
 - C. Facility Map
 - D. Vicinity Map
 - E. Standard Provisions

PROPOSED



CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION

MONITORING AND REPORTING PROGRAM NO. 2011-(PROPOSED)
WDID NO. 6A268512900

FOR
CAMP PENDLETON & QUANTICO HOUSING LLC/LINCOLN MILITARY
HOUSING AND UNITED STATES MARINE CORPS
MOUNTAIN WARFARE TRAINING CENTER COLEVILLE HOUSING
WASTEWATER TREATMENT AND DISPOSAL FACILITY

Mono County

I. **GENERAL REQUIREMENTS**

A. Effective date

This monitoring and reporting program (MRP) is effective on the date of adoption, or as amended by the Executive Officer. This Monitoring and Reporting Program (MRP) covers the monitoring for the existing Facility, which is a community septic system, and the Proposed Facility, which will be a secondary treatment system (aerated tanks with activated sludge process and a polishing filter). The Discharger must comply with other monitoring and reporting requirements for the existing Facility, water supply operations, and the requirements of this MRP for the proposed Facility upon adoption of this Order, and as appropriate for the proposed Facility.

B. Overview of Reports Required

The Discharger each year must provide **four (4) Quarterly Monitoring Reports and one (1) Annual Report**. The monitoring period covered for each report and the dates the reports are due are listed below in each respective subsection. Each report must provide information on general operations, flow rates, effluent quality (where applicable), and ground water quality, as specified herein.

Reports must include applicable information to verify compliance with California Environmental Quality Act (CEQA) conditions of approval associated with this Order as specified herein.

C. Certified Cover Letter

The Discharger must use Attachment 1 as a cover letter, or a cover letter containing the same information, for all reports provided to the Water Board. All violations of requirements must be disclosed in the report cover letters.

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D. General Provisions

The Discharger must comply with the "General Provisions for Monitoring and Reporting" dated September 1, 1994, which is made part of this Monitoring and Reporting Program as Attachment 2.

E. Monitoring for Existing and Proposed Facility

This MRP applies to the existing and proposed Facilities. Monitoring that is not possible or required on the existing system (community septic system) will be stated after the requirement, in parenthesis, "(Not required for the community septic system)."

F. Final Construction As-Built-Plans

The Discharger must provide a construction report signed and certified by a California licensed Civil engineer that certifies the disposal areas were constructed to the design specified in the Report of Waste Discharge received on July 26, 2010. The report may be segmented into portion of the overall subsurface work so areas completed may be put into use. The report(s) must include one or more scaled drawings on 8 1/2" by 11" sheets of paper showing and labeling the proposed Facilities as completed.

II. MONITORING AND QUARTERLY REPORTING REQUIREMENTS

The Discharger must monitor the following and submit quarterly reports on the following reoccurring dates, covering the time periods stated. The information that must be submitted to complete the report is specified below in items II. A.- D.

<u>Monitoring Period</u>	<u>Report Due Date</u>
October 1 - December 31	January 30
January 1 - March 31	April 30
April 1 - June 30	July 30
July 1 - September 30	October 30

A. Facility Flow Monitoring

1. The total volume of wastewater discharging, in gallons, for each day of each month.
2. The average daily flow rate of the discharge. (Not required for the community septic system.)
3. The monthly average flow rate in gallons per day (gpd), of domestic treated wastewater discharged to the disposal field, calculated for each month in the quarter.

4. The date and volume of filter rinse water flow from drinking water treatment media rinsing to the storm water retention basin for each month in the quarter.

B. Effluent Monitoring (Proposed Facility)

When the proposed Facility is completed and operating the following effluent samples must be collected at the clear well and prior to being pumped into the disposal fields. The effluent must be tested for the following parameters and at the required frequency as specified below. The Discharger may collect additional samples, but must provide the data from all samples collected and analyzed. (Not required for the community septic system.)

Parameter	Units	Testing Method	Frequency	Minimum Detection limit
pH	pH units	Field ¹	Weekly	N/A ³
Electrical conductivity	µmho/cm	Field ¹	Weekly	100µmho/cm
Biochemical Oxygen Demand (BOD)	mg/l	Lab ²	Weekly	15
Total Suspended Solids	mg/l	Lab ²	Weekly	10
Nitrate as Nitrogen	mg/l	Lab ²	Weekly	0.5
Total Dissolved Solids	mg/l	Lab ²	Monthly	75
Total Nitrogen	mg/l	Lab ²	Monthly	0.5
Total Phosphorus	mg/l	Lab ²	Monthly	0.5
Chloride	mg/l	Lab ²	Monthly	2.5

1 - Field - Means a field test accomplished by site personnel with a direct read instrument calibrated per manufacturer specifications.

2 - Lab - Laboratory means the testing will be accomplished by a laboratory accredited by California Environmental Laboratory Accreditation Program and is following either an EPA method or a Standard Method for examining wastewater or drinking water.

3 - pH minimum detection values are not required but the method used to determine pH must be able to determine the pH between 7.5 -12.5 and have a precision of 0.5.

C. Ground Water Monitoring

1. Ground Water Elevation Measurements

Prior to purging sampling wells or collecting samples from monitoring wells the static ground water elevations must be determined at all monitoring wells. Depths to ground water with respect to mean sea level may be used to determine elevations. The Discharger must determine and report the ground water gradient and flow direction based on the ground water elevations.

2. Ground Water Purging

Ground water monitoring wells must be purged prior to collecting samples. The following is the procedure that must be followed for groundwater purging.

- a. Ground water samples must be collected after either of the following:
 - 1) an amount of water equal to three times the amount of water within the well casing has been removed, or
 - 2) the temperature, electrical conductivity, and pH measurements of the water in the well have stabilized to approximately $\pm 10\%$ for successive measurements after a minimum of one well volume has been removed.

If a monitoring well is purged, and does not appear to be recovering to pre-purging elevations, the Discharger must document the water elevation and time the well goes dry and the volume of water removed. The Discharger may return the next day and attempt to collect the sample from the well without further purging and document all the information above with the amount of time allowed for the well to recover.

- b. Measurements of temperature, electrical conductivity, and pH during purging must be reported with the results of ground water analyses.
- c. Well casing diameter, well depth, depth to ground water, and total volume purged prior to sampling must also be reported with the ground water monitoring results.

3. Ground Water Sampling and Analyses

Existing monitoring wells established by the Discharger for monitoring under this MRP are referred to by the following designations: Deep MW-1, Deep MW-2 and Deep MW-3. The approximate locations of the monitoring wells are shown in Attachment 3. The monitoring wells must be sampled for the following parameters and at the frequency provided below.

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Parameter	Units	Frequency	Minimum Detection limit
pH ¹	pH units	Quarterly	N/A ⁵
Electrical Conductivity ¹	µmho/cm	Quarterly	100
Total Dissolved Solids ²	mg/l	Quarterly	10
Fecal Coliform ²	MPN/100ml ³	Quarterly	2
Total Nitrogen ²	mg/l	Quarterly	0.5
Nitrate as Nitrogen ²	mg/l	Quarterly	0.5
Chloride ²	mg/l	Quarterly	2.5
Purgeable Organics ²	µg/l	Every fifth year	per method
Acid Extractable Organics ⁴ (semi volatiles)	µg/l	Every fifth year	per method
Organochlorine pesticides ⁴ and PCBs	µg/l	Every fifth year	per method
Heavy metals ⁴	mg/l	Every fifth year	per method

1 - Measurement by a field test accomplished by site personnel with a direct read instrument calibrated per manufacturers specifications.

2 - The parameter will be accomplished by a laboratory accredited by California Environmental Laboratory Accreditation Program and is following either an EPA method or a Standard method for examining wastewater or drinking water.

3 - Units of MPN/100 ml, stands for Most Probable Number of bacteria colonies per 100 milliliters.

4 - The samples are to be analyzed for the priority pollutants listed in Attachment 4 of this MRP, according to the specified method or methods.

5 - pH minimum detection values are not required but the method used to determine pH must be able to determine the pH between 1.5 -12.5 and have a precision of 0.25.

D. Monitoring General Operations and CEQA conditions

1. The Discharger must monitor and report on any operational problems and maintenance activities affecting effluent discharge or compliance with waste discharge requirements and proposed corrective measures, if needed, and a schedule for completion.
2. Monthly visual inspections must be conducted for surfacing effluent in the discharge areas.
3. The Discharger must monitor and report quarterly on compliance with conditions of approval (COA) to ensure that environmental effects of the project (SCH#2011012057) will be insignificant as approved in accordance with CEQA findings of this Order. Condition measures to be completed and/or monitored are stated in Attachment 5, which is made part of this MRP. These CEQA monitoring requirements are applicable until June 30, 2013, unless the monitoring period is extended beyond June 30, 2013, in writing by the Executive Officer as an amendment to the MRP. A COA report covering the monitoring period April – June 2013 must be provided by July 30, 2013.

040026

III. ANNUAL MONITORING REPORT

The Discharger must submit an Annual report by **January 31** of each year covering the period from January 1 through December 31 of the previous calendar year. The information that must be submitted to complete the report is specified below in items A. - C.

A. Annual Report General Reporting

The Annual Report must include information specified below.

1. Graphical and tabular presentation of all effluent monitoring data obtained for the previous year.
2. Graphical and tabular presentation of all groundwater monitoring data obtained for the previous 5 years.
3. The compliance record and corrective actions taken or planned which may be needed to bring the discharge into full compliance with the waste discharge requirements.
4. Any modification or additions to, or any major maintenance conducted on, the wastewater flow measuring equipment, treatment or disposal facilities during the past year.
5. The amount of sludge removed and the sludge disposal location(s).

B. Review of effluent and ground water sample results.

1. The Discharger is required to review the effluent data collected for violations with respect to effluent limits and self-report any violation in the monitoring and reporting report. (Not required for the community septic system.)
2. The Discharger must also review the ground water data collected and identify any violation of a receiving water quality objective.
3. The Discharger must indicate the last date when monitoring at 5-year intervals required in MRP section II.C.3., above was completed, and when the next sampling will be conducted to meet the requirements.

C. Data Analysis Review

1. By Oct 15, 2011, the Discharger must produce for acceptance by the Water Board's Executive Officer a procedure to analyze and review the ground water data annually. The review and analysis may be accomplished by comparing up gradient and down gradient monitoring well data, intrawell statistical analysis, interwell statistical analysis or other method. The analysis procedure must provide a method to determine if the ground water data indicates either an unusually increase of that a ground water quality objective has been exceeded.

If the Executive Officer does not provide a written confirmation in 45 day after receiving the procedure, the procedure may be used for the next annual report. Any comments issued after 45 days will require a response and may alter the analysis for the next annual report.

2. The Discharger must annually review all the ground water data collected in item II.C.3. and conduct an analysis on the data as proposed and accepted by the Water Boards Executive Officer
3. The Discharger must determine and certify that the ground water monitoring data has not shown a statistically significant increase for the monitored constituents. If the certification cannot be provided because an increase is detected, the Discharger is required to notify the Water Board within 5 days of identifying the conditions and implement procedures in section IV. of this MRP.

IV. CONTINGENCY RESPONSE

If the Discharger cannot provide the certification in section III.C. then the Discharger must take the following procedural steps to determine if the existing or proposed Facility is affecting the ground water.

- A. Resample the affected monitoring well or wells for the constituent of concern, submit the data to the Water Board within 45 days of the discovery of the increase, and provide an analysis that evaluates whether the concentrations of monitored constituents are increasing.
- B. If the constituent is considered to be increasing, produce and provide an investigation, evaluation and monitoring work plan within 120 days from the discovery of an increase in concentrations of monitored constituents. The work plan must describe how an investigation and evaluation will be conducted to determine if the Facility is causing or contributing to the increase in the concentrations of constituents in ground water, and provide a schedule for completing the evaluation.
- C. If the results of the investigation work plan confirm the Facility is the source of the increases in the monitored ground water constituents, the Discharger must, within 120 days of the determination, propose corrective measures for acceptance by the Water Board's Executive Officer.

V. SLUDGE MANAGEMENT PLAN REPORT

The Discharger must provide a Sludge Management Plan report by **January 30, 2012**. The plan must describe the sludge management, handling, and treatment processes, including all areas expected to be used in sludge management prior to final disposal offsite; control measures to prevent spills; and measures to control odors. The Plan must also include the disposal location for off site sludge disposal.

VI. GROUND WATER MONITORING WELL REQUIREMENTS

- A. The Discharger must submit by **October 1, 2011** a ground water monitoring system and a proposed time schedule for installation of additional ground water monitoring wells as described below. One or more additional wells are needed to account for observed shifts in groundwater directions and gradients. The monitoring system, at a minimum must, include the following:
1. A minimum of four monitoring wells, including existing wells, must be installed to determine the ground water gradient of the ground water.
 2. Additional wells must be installed, if necessary, to insure that at least one (1) well is up gradient and two (2) wells are down gradient of the wastewater treatment facilities during all seasons and anticipated ground water pumping conditions. The Discharger must demonstrate that at least two down gradient wells are located such that ground water potentially impacted by the discharge will be monitored at all times.
 3. The specific design and location of the wells must be submitted for review and acceptance by the Water Board's Executive Officer with analyses of well water surface elevations and gradients for the last three years of monitoring at existing wells.
 4. The ground water monitoring wells must be installed at the disposal site in accordance with the approved plan and by the date specified by the Executive Officer.
 5. As built design report shall be submitted within 60 days after any new ground water monitoring system is installed. This report shall include a statement of certification signed by a California registered civil engineer or geologist, regarding the placement, lithology and construction of the well or wells.
- B. After the installation of the new wells as accepted by the Executive Officer grab water samples shall be collected from the monitoring wells, and analyzed to determine the magnitude of the parameters in the table in Section II.C.3.a. of this Monitoring and Reporting Program.

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VII. CONSTRUCTION INSPECTION AND QUALITY ASSURANCE

Fourteen days or more before beginning construction the Discharger must provide a quality assurance plan. The plan must identify personnel who will conduct inspections, and their qualifications to do so, for all work on the subsurface disposal fields, and the repairs to the storm water retention Basin.

Ordered By _____ Date _____
HAROLD J. SINGER
EXECUTIVE OFFICER

- Attachments:
- A. Certified Cover Letter
 - B. General Provisions for Monitoring and Reporting
 - C. Site Map
 - D. List of Priority Pollutants
 - E. California Environmental Quality Act Monitoring – Conditions of Approval

PROPOSED

040031

ATTACHMENT A

040032

ATTACHMENT A

Date _____

California Regional Water Quality Control Board
Lahontan Region
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150

Facility Name: _____

Address: _____

Contact Person: _____

Job Title: _____

Phone: _____

Email: _____

WDR/NPDES Order Number: _____

WDID Number: _____

Type of Report (circle one): Monthly Quarterly Semi-Annual Annual Other

Month(s) (circle applicable month(s)*: JAN FEB MAR APR MAY JUN
JUL AUG SEP OCT NOV DEC

*annual Reports (circle the first month of the reporting period)

Year: _____

Violation(s)? (Please check one): _____ NO _____ YES*

*If YES is marked complete a-g (Attach Additional information as necessary)

a) Brief Description of Violation: _____

040033

**b) Section(s) of WDRs/NPDES
Permit Violated:**

c) Reported Value(s) or Volume:

**d) WDRs/NPDES
Limit/Condition:**

**e) Date(s) and Duration of
Violation(s):**

f) Explanation of Cause(s):

**g) Corrective Action(s)
(Specify actions taken and a schedule
for actions to be taken)**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision following a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my knowledge of the person(s) who manage the system, or those directly responsible for data gathering, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

If you have any questions or require additional information, please contact _____ at the number provided above.

Signature: _____

Name: _____

Title: _____

ATTACHMENT B

0400357

ATTACHMENT B

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LAHONTAN REGION

GENERAL PROVISIONS FOR MONITORING AND REPORTING

1. SAMPLING AND ANALYSIS

- a. All analyses shall be performed in accordance with the current edition(s) of the following documents:
 - i. Standard Methods for the Examination of Water and Wastewater
 - ii. Methods for Chemical Analysis of Water and Wastes, EPA
- b. All analyses shall be performed in a laboratory certified to perform such analyses by the California State Department of Health Services or a laboratory approved by the Regional Board Executive Officer. Specific methods of analysis must be identified on each laboratory report.
- c. Any modifications to the above methods to eliminate known interferences shall be reported with the sample results. The methods used shall also be reported. If methods other than EPA-approved methods or Standard Methods are used, the exact methodology must be submitted for review and must be approved by the Regional Board prior to use.
- d. The Discharger shall establish chain-of-custody procedures to insure that specific individuals are responsible for sample integrity from commencement of sample collection through delivery to an approved laboratory. Sample collection, storage, and analysis shall be conducted in accordance with an approved Sampling and Analysis Plan (SAP). The most recent version of the approved SAP shall be kept at the facility.
- e. The Discharger shall calibrate and perform maintenance procedures on all monitoring instruments and equipment to ensure accuracy of measurements, or shall insure that both activities will be conducted. The calibration of any wastewater flow measuring device shall be recorded and maintained in the permanent log book described in 2.b, below.
- f. A grab sample is defined as an individual sample collected in fewer than 15 minutes.
- g. A composite sample is defined as a combination of no fewer than eight individual samples obtained over the specified sampling period at equal intervals. The volume of each individual sample shall be proportional to the discharge flow rate at the time of sampling. The sampling period shall equal

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E

the discharge period, or 24 hours, whichever period is shorter.

2. OPERATIONAL REQUIREMENTS

a. Sample Results

Pursuant to California Water Code Section 13267(b), the Discharger shall maintain all sampling and analytical results including: strip charts; date, exact place, and time of sampling; date analyses were performed; sample collector's name; analyst's name; analytical techniques used; and results of all analyses. Such records shall be retained for a minimum of three years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge, or when requested by the Regional Board.

b. Operational Log

Pursuant to California Water Code Section 13267(b), an operation and maintenance log shall be maintained at the facility. All monitoring and reporting data shall be recorded in a permanent log book.

3. REPORTING

- a. For every item where the requirements are not met, the Discharger shall submit a statement of the actions undertaken or proposed which will bring the discharge into full compliance with requirements at the earliest time, and shall submit a timetable for correction.
- b. Pursuant to California Water Code Section 13267(b), all sampling and analytical results shall be made available to the Regional Board upon request. Results shall be retained for a minimum of three years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge, or when requested by the Regional Board.
- c. The Discharger shall provide a brief summary of any operational problems and maintenance activities to the Board with each monitoring report. Any modifications or additions to, or any major maintenance conducted on, or any major problems occurring to the wastewater conveyance system, treatment facilities, or disposal facilities shall be included in this summary.
- d. Monitoring reports shall be signed by:
 - i. In the case of a corporation, by a principal executive officer at least of the level of vice-president or his duly authorized representative, if such representative is responsible for the overall operation of the facility from which the discharge originates;
 - ii. In the case of a partnership, by a general partner;

- iii. In the case of a sole proprietorship, by the proprietor; or
 - iv. In the case of a municipal, state or other public facility, by either a principal executive officer, ranking elected official, or other duly authorized employee.
- e. Monitoring reports are to include the following:
- i. Name and telephone number of individual who can answer questions about the report.
 - ii. The Monitoring and Reporting Program Number.
 - iii. WDID Number.
- f. **Modifications**

This Monitoring and Reporting Program may be modified at the discretion of the Regional Board Executive Officer.

4. NONCOMPLIANCE

Under Section 13268 of the Water Code, any person failing or refusing to furnish technical or monitoring reports, or falsifying any information provided therein, is guilty of a misdemeanor and may be liable civilly in an amount of up to one thousand dollars (\$1,000) for each day of violation under Section 13268 of the Water Code.

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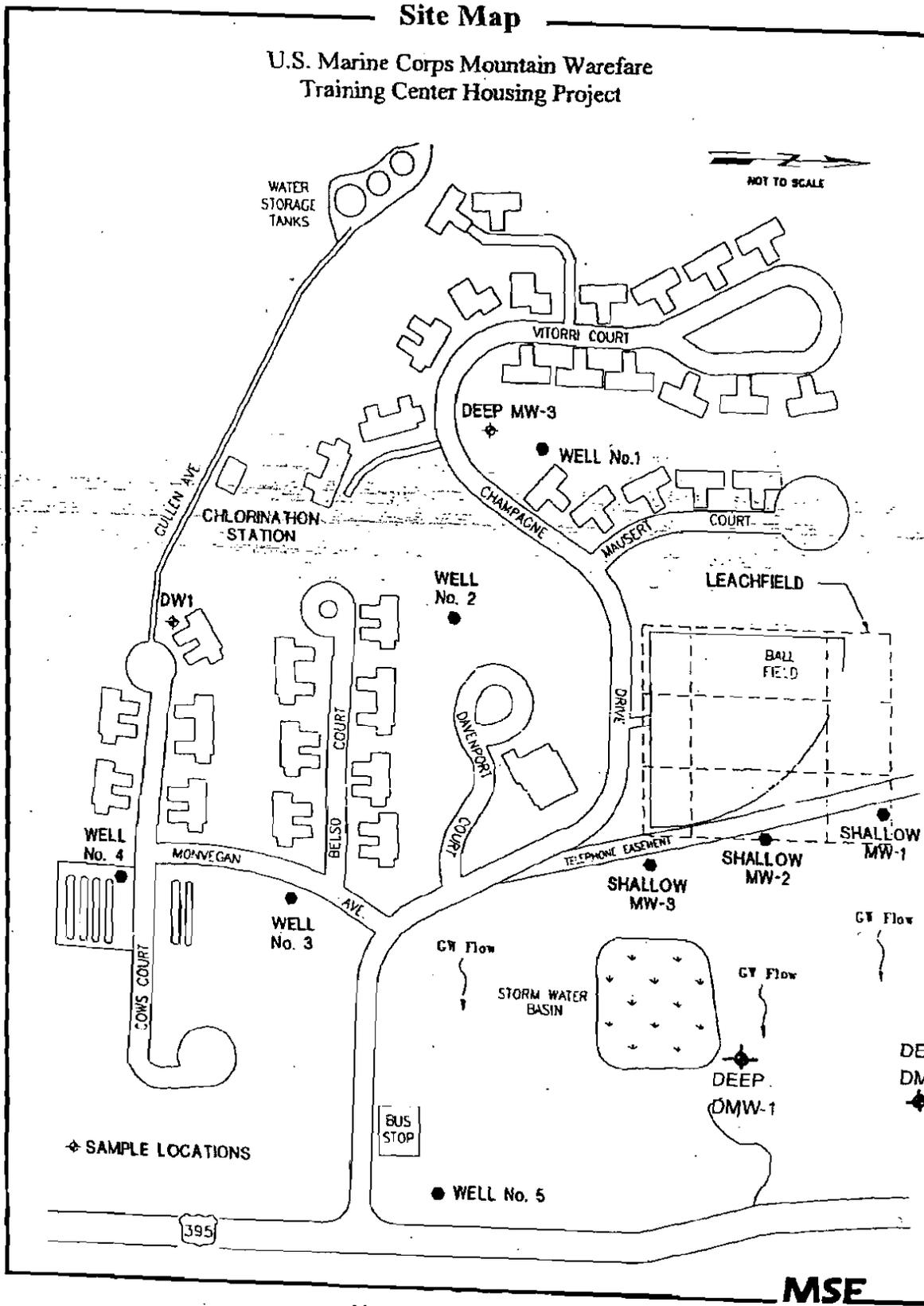
ATTACHMENT C

040039

ATTACHMENT C

Site Map

U.S. Marine Corps Mountain Warfare
Training Center Housing Project



Map not to Scale

040040

ATTACHMENT D

040041

ATTACHMENT D

1

CTR Number	Parameter	CAS Number	Suggested Analytical Methods
1	Antimony	7440360	EPA 6020/200.8
2	Arsenic	7440382	EPA 1632
3	Beryllium	7440417	EPA 6020/200.8
4	Cadmium	7440439	EPA 1638/200.8
5a	Chromium (III)	16065831	EPA 6020/200.8
5a	Chromium (VI)	18540299	EPA 7199/1636
6	Copper	7440508	EPA 6020/200.8
7	Lead	7439921	EPA 1638
8	Mercury	7439976	EPA 1669/1631
9	Nickel	7440020	EPA 6020/200.8
10	Selenium	7782492	EPA 6020/200.8
11	Silver	7440224	EPA 6020/200.8
12	Thallium	7440280	EPA 6020/200.8
13	Zinc	7440666	EPA 6020/200.8
*14	Cyanide	57125	EPA 9012A
*15	Asbestos	1332214	EPA/600/R-93/116(PCM)
*16	2,3,7,8-TCDD	1746016	EPA 8290 (HRGC) MS
17	Acrolein	107028	EPA 8260B
18	Acrylonitrile	107131	EPA 8260B
19	Benzene	71432	EPA 8260B or 624
20	Bromoform	75252	EPA 8260B or 624
21	Carbon Tetrachloride	56235	EPA 8260B or 624
22	Chlorobenzene	108907	EPA 8260B or 624
23	Chlorodibromomethane	124481	EPA 8260B or 624
24	Chloroethane	75003	EPA 8260B or 624
25	2-Chloroethylvinyl Ether	110758	EPA 8260B or 624
26	Chloroform	67663	EPA 8260B or 624
27	Dichlorobromomethane	75274	EPA 8260B or 624
28	1,1-Dichloroethane	75343	EPA 8260B or 624
29	1,2-Dichloroethane	107062	EPA 8260B or 624
30	1,1-Dichloroethylene	75354	EPA 8260B or 624
31	1,2-Dichloropropane	78875	EPA 8260B or 624
32	1,3-Dichloropropylene	542756	EPA 8260B or 624
33	Ethylbenzene	100414	EPA 8260B or 624
34	Methyl Bromide	74839	EPA 8260B or 624
35	Methyl Chloride	74873	EPA 8260B or 624
36	Methylene Chloride	75092	EPA 8260B or 624
37	1,1,2,2-Tetrachloroethane	79345	EPA 8260B or 624
38	Tetrachloroethylene	127184	EPA 8260B or 624
39	Toluene	108883	EPA 8260B or 624
40	1,2-Trans-Dichloroethylene	156605	EPA 8260B or 624
41	1,1,1-Trichloroethane	71556	EPA 8260B or 624

* These constituents do not need to be analyzed for

040042

CTR Number	Parameter	CAS Number	Suggested Analytical Methods
42	1,12-Trichloroethane	79005	EPA 8260B or 624
43	Trichloroethylene	79016	EPA 8260B or 624
44	Vinyl Chloride	75014	EPA 8260B or 624
45	2-Chlorophenol	95578	EPA 8270C or 625
46	2,4-Dichlorophenol	120832	EPA 8270C or 625
47	2,4-Dimethylphenol	105679	EPA 8270C or 625
48	2-Methyl-4,6-Dinitrophenol	534521	EPA 8270C or 625
49	2,4-Dinitrophenol	51285	EPA 8270C or 625
50	2-Nitrophenol	88755	EPA 8270C or 625
51	4-Nitrophenol	100027	EPA 8270C or 625
52	3-Methyl-4-Chlorophenol	59507	EPA 8270C or 625
53	Pentachlorophenol	87865	EPA 8270C or 625
54	Phenol	108952	EPA 8270C or 625
55	2,4,6-Trichlorophenol	88062	EPA 8270C or 625
56	Acenaphthene	83329	EPA 8270C or 625
57	Acenaphthylene	208968	EPA 8270C or 625
58	Anthracene	120127	EPA 8270C or 625
59	Benzenzidine	92875	EPA 8270C or 625
60	Benzo(a)Anthracene	56553	EPA 8270C or 625
61	Benzo(a)Pyrene	50328	EPA 8270C or 625
62	Benzo(b)Fluoranthene	205992	EPA 8270C or 625
63	Benzo(ghi)Perylene	191242	EPA 8270C or 625
64	Benzo(k)Fluoranthene	207089	EPA 8270C or 625
65	Bis(2-Chloroethoxy)Methane	111911	EPA 8270C or 625
66	Bis(2-Chloroethyl)Ether	111444	EPA 8270C or 625
67	Bis(2-Chloroisopropyl)Ether	108601	EPA 8270C or 625
68	Bis(2-Ethylhexyl)Phthalate	117817	EPA 8270C or 625
69	4-Bromophenyl Phenyl Ether	101553	EPA 8270C or 625
70	Butylbenzyl Phthalate	85687	EPA 8270C or 625
71	2-Chloronaphthalene	91587	EPA 8270C or 625
72	4-Chlorophenyl Phenyl Ether	7005723	EPA 8270C or 625
73	Chrysene	218019	EPA 8270C or 625
74	Dibenzo(a,h)Anthracene	53703	EPA 8270C or 625
75	1,2-Dichlorobenzene	95501	EPA 8270C or 625
76	1,3-Dichlorobenzene	541731	EPA 8270C or 625
77	1,4-Dichlorobenzene	106467	EPA 8270C or 625
78	3,3'-Dichlorobenzidine	91941	EPA 8270C or 625
79	Diethyl Phthalate	84662	EPA 8270C or 625
80	Dimethyl Phthalate	131113	EPA 8270C or 625
81	Di-n-Butyl Phthalate	84742	EPA 8270C or 625
82	2,4-Dinitrotoluene	121142	EPA 8270C or 625
83	2,6-Dinitrotoluene	606202	EPA 8270C or 625

* These constituents do not need to be analyzed for

CTR Number	Parameter	CAS Number	Suggested Analytical Methods
84	Di-n-Octyl Phthalate	117840	EPA 8270C or 625
85	1,2-Diphenylhydrazine	122667	EPA 8270C or 625
86	Fluoranthene	206440	EPA 8270C or 625
87	Fluorene	86737	EPA 8270C or 625
88	Hexachlorobenzene	118741	EPA 8270C or 625
89	Hexachlorobutadiene	87863	EPA 8270C or 625
90	Hexachlorocyclopentadiene	77474	EPA 8270C or 625
91	Hexachloroethane	67721	EPA 8270C or 625
92	Indeno(1,2,3-cd)Pyrene	193395	EPA 8270C or 625
93	Isophorone	78591	EPA 8270C or 625
94	Naphthalene	91203	EPA 8270C or 625
95	Nitrobenzene	98953	EPA 8270C or 625
96	N-Nitrosodimethylamine	62759	EPA 8270C or 625
97	N-Nitrosodi-n-Propylamine	621647	EPA 8270C or 625
98	N-Nitrosodiphenylamine	86306	EPA 8270C or 625
99	Phenanthrene	85018	EPA 8270C or 625
100	Pyrene	129000	EPA 8270C or 625
101	1,2,4-Trichlorobenzene	120821	EPA 8270C or 625
102	Aldrin	309002	EPA 8081A or 608
103	alpha-BHC	319846	EPA 8081A or 608
104	beta-BHC	319857	EPA 8081A or 608
105	gamma-BHC	58899	EPA 8081A or 608
106	delta-BHC	319868	EPA 8081A or 608
107	Chlordane	57749	EPA 8081A or 608
108	4,4'-DDT	50293	EPA 8081A or 608
109	4,4'-DDE	72559	EPA 8081A or 608
110	4,4'-DDD	72548	EPA 8081A or 608
111	Dieldrin	60571	EPA 8081A or 608
112	alpha-Endosulfan	959988	EPA 8081A or 608
113	beta-Endosulfan	33213659	EPA 8081A or 608
114	Endosulfan Sulfate	1031078	EPA 8081A or 608
115	Endrin	72208	EPA 8081A or 608
116	Endrin Aldehyde	7421934	EPA 8081A or 608
117	Heptachlor	76448	EPA 8081A or 608
118	Heptachlor Epoxide	1024573	EPA 8081A or 608
119	PCB-1016	12674112	EPA 8081A or 608
120	PCB-1221	11104282	EPA 8081A or 608
121	PCB-1232	11141165	EPA 8081A or 608
122	PCB-1242	53469219	EPA 8081A or 608
123	PCB-1248	12672296	EPA 8081A or 608
124	PCB-1254	11097691	EPA 8081A or 608
125	PCB-1260	11096825	EPA 8081A or 608
126	Toxaphene	8001352	EPA 8081A or 608

* These constituents do not need to be analyzed for

040044

ATTACHMENT E

040045

**Attachment 5 - Coleville MFHA Project IS-ND:
CEQA Project Conditions of Approval**

This Conditions of Approval list was compiled from the Coleville Military Family Housing Area Facilities Improvements Project Initial Study/Negative Declaration (IS-ND, January 2011). The Conditions of Approval are enforceable under waste discharge requirements and provide a means to verify completion of measures to avoid or reduce impacts, and/or validate compliance with the CEQA project description. This Conditions of Approval assumes the Discharger will comply with all laws and policies identified in the IS-ND, and the Waste Discharge Requirements for the facility and project site. As such, specific regulations and the necessary compliance are not included in this Conditions of Approval. The Discharger must monitor and report quarterly on the status of compliance, **including additional information satisfactory to fully demonstrate compliance**, with the following:

Issue Area of Concern	Condition Measure	Page in CEQA IS-ND	Date(s) Verified or Complete	Date Reported
1. Aesthetics	Native vegetation will be planted to enhance the appearance of and partially screen the wastewater treatment plant and adjacent above ground Project components.	20		
2. Aesthetics	The existing playfield will be replaced with native vegetation and returned to restricted open space with no public access. Any landscaping/vegetation that would be disturbed as a result of implementation of the Proposed Project will be replaced upon completion of construction and will be consistent with existing landscaping of the area in order to maintain the existing visual character of the CMFHA	22		
3. Air Quality	The Discharger will conduct activities such as seeding, planting and mulching with ground covers to revegetate and stabilize disturbed soils from erosion immediately following completion of construction.	28		
4. Air Quality	Particulate matter emissions from construction activities will be mitigated through dust reduction measures (e.g., watering of exposed soils, soil stockpiling and soil stabilization).	28		
5. Biological Resources	Following the completion of construction, the Discharger will ensure construction contractors immediately stabilize all disturbed soils and re-plant with grass and shrub species consistent with pre-existing vegetation and in compliance with EO 13112, Invasive Species.	37		

040046

Issue Area of Concern	Condition Measure	Page in CEQA IS-ND	Date(s) Verified or Complete	Date Reported
6. Biological Resources	The Discharger will implement the following measures to minimize potential impacts to migratory birds and raptors. If grading occurs during the breeding season for migratory birds and raptors (February 15 – August 31), a biologist will survey the Project site and adjacent areas for nests (in trees, shrubs, and on the ground). If the biologist finds an active nest, construction workers will not disturb the nest or adjacent areas (within 150 feet) until the biologist determines that the nest is no longer in use.	37		
7. Cultural Resources	To ensure that any previously unknown resources in other areas of the Project site that may be discovered during earthmoving activities are properly addressed, all Project related earthmoving activities will cease in the event of a discovery until an archaeologist could provide input regarding the significance of the resource.	42		
8. Geology and Soils	The Proposed Project will be designed in accordance with standard geotechnical elements to account for site specific conditions, including seismic considerations prior to construction.	44		
9. Geology and Soils	Proposed construction activities would require excavation, grading, fill, and drilling and will conform to the measures recommended in the Project's site-specific erosion control plan (ECP).	44		
10. Hazards and Hazardous Materials	In the event, workers encounter a large volume of effluent or other sewage during construction, a California-licensed sewage contractor will remove the effluent for onsite disposal at the treatment plant or for off-site disposal in accordance with all applicable regulations.	50		

040047

Issue Area of Concern	Condition Measure	Page in CEQA IS-ND	Date(s) Verified or Complete	Date Reported
11. Hazards and Hazardous Materials	During construction, all inactive but exposed areas of the existing leach field system will be covered. The Discharger will provide and follow a Health and Safety Plan with provisions to warn, train and protect workers against exposure to sewage wastes. Workers will be required to wash in designated on-site wash facilities after having worked within the areas of the existing leach field system until all active disturbances have been completed.	50		
12. Hydrology/ Water Quality	In conducting drainage modifications during construction activities, the existing conveyance and basin capacity will be maintained at all times. Modifications to the drainage basin are planned to occur in the dry summer months and/or when there is less than a 30 percent chance of precipitation at the Project site over the next three days as forecasted by the National Weather Service internet website.	54, 60		
13. Hydrology/ Water Quality	Off site discharges will not occur during construction. Water discovered and extracted during construction along with well development water that cannot be added to the drinking water supply will be discharged into the storm water retention basin during dry conditions when the water can percolate.	7		
14. Hydrology/ Water Quality	Filter Media vessel rinse water will continue to be disposed of in the on-site storm water retention basin. The filter media rinsing process will only occur when standing water is not present in the storm water retention basin.	6		
15. Hydrology/ Water Quality	Visual and flow volume monitoring on the retention basin will occur during rinse water discharge to the retention basin.	6		
16. Hydrology/ Water Quality	Discharger will comply with Section 438 of the Energy Independence and Security Act of 2007 (established federal storm water runoff requirements to maintain or restore, to the maximum extent technically feasible, the pre-development hydrology with regard to the temperature, rate, volume, and duration of flow).	10, 55		

Issue Area of Concern	Condition Measure	Page in CEQA IS-ND	Date(s) Verified or Complete	Date Reported
17. Hydrology/ Water Quality	Storm water runoff will be rerouted to the reconfigured storm water retention basin, which will maintain the 237,000 ft ³ pre-project volume capacity.	10, 60		
18. Hydrology/ Water Quality	Vegetation will be planted over the underground effluent disposal system to aid consumption of water and nutrients.	56		
19. Noise	Construction will be conducted only during the daytime (between the hours of 7 a.m. and 5 p.m. Monday through Friday).	67, 70		
20. Noise	Construction equipment will be stored and maintained away from the existing sensitive receptors, to the extent feasible, and all equipment shall be equipped with properly operating and maintained muffling devices.	20, 67, 70		
21. Public Services	The existing CMFHA playfield, located to the west of the proposed wastewater treatment plant will be removed, regraded and revegetated with native grasses. The former playfield area will be replaced with an open space area that could continue to serve as a dog run area.	4, 73, 74		
22. Utilities/ Service Systems	The existing septic system contents will be pumped out of the treatment system and the septic tanks will be removed in accordance with Mono County code requirements.	4		
Source: Coleville Military Family Housing Area Facilities Improvements Project Initial Study/Negative Declaration, California Regional Water Quality Control Board, Lahontan Region, Region 6, January 2011.				

ENCLOSURE 3

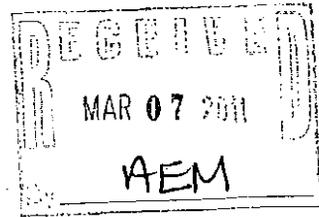


JERRY BROWN
GOVERNOR

STATE OF CALIFORNIA

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT



February 23, 2011

Alan Miller
Regional Water Quality Control Board, Region 6 (Lahontan)
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150

Subject: Coleville Military Family Housing Area
SCH#: 2011012057

Dear Alan Miller:

The State Clearinghouse submitted the above named Negative Declaration to selected state agencies for review. The review period closed on February 22, 2011, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely

Scott Morgan
Director, State Clearinghouse

040050

**Document Details Report
State Clearinghouse Data Base**

SCH# 2011012057
Project Title Coleville Military Family Housing Area
Lead Agency Regional Water Quality Control Board, Region 6 (Lahontan), South Lake Tahoe

Type Neg Negative Declaration
Description The Proposed Project would involve the following three structural and infrastructure improvements to the CMFHA Figure 3 shows the locations of the proposed project improvements. Each of the components listed and described below are identified in the figure. Improvements to the existing CMFHA wastewater treatment system and removal of the existing septic systems in accordance with Mono County requirements; Modifications to the existing storm water drainage and runoff infrastructure at the CMFHA; and, Improvements to the existing CMFHA potable water infrastructure.

Lead Agency Contact

Name Alan Miller
Agency Regional Water Quality Control Board, Region 6 (Lahontan)
Phone (530) 542-5430 **Fax**
email
Address 2501 Lake Tahoe Boulevard
City South Lake Tahoe **State** CA **Zip** 96150

Project Location

County Mono
City
Region
Lat / Long 38° 35.14' 19" N / 119° 30.56' 6.13" W
Cross Streets US Hwy 395 and Champagne Avenue

Parcel No.	Township	Range	Section	Base
-------------------	-----------------	--------------	----------------	-------------

Proximity to:

Highways US Hwy 395
Airports
Railways
Waterways West Walker River
Schools
Land Use Resource Management

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Landuse

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 6 (Inyo & Mono Region); Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 9; CA Department of Public Health; State Water Resources Control Board, Division of Financial Assistance; State Water Resources Control Board, Division of Water Rights; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 01/24/2011 **Start of Review** 01/24/2011 **End of Review** 02/22/2011

040051



California Regional Water Quality Control Board Lahontan Region



Linda S. Adams
Acting Secretary for
Environmental Protection

2501 Lake Tahoe Boulevard, South Lake Tahoe, California 96150
(530) 542-5400 • Fax (530) 544-2271
<http://www.waterboards.ca.gov/lahontan>

Edmund G. Brown Jr.
Governor

TO: Interested and Responsible Parties
FROM: Alan Miller, PE 
Chief, North Basin Regulatory Unit
LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD
DATE: January 21, 2011
SUBJECT: INITIAL STUDY/NEGATIVE DECLARATION: COLEVILLE MILITARY FAMILY HOUSING AREA FACILITIES IMPROVEMENTS PROJECT, MONO COUNTY

Please find attached the Initial Study/Negative Declaration for the Coleville Military Family Housing Area Facilities Improvements Project.

PROJECT DESCRIPTION: The Proposed Project would involve the following three structural and infrastructure improvements to the CMFHA Improvements to the existing CMFHA wastewater treatment system and removal of the existing septic systems in accordance with Mono County requirements; Modifications to the existing storm water drainage and runoff infrastructure at the CMFHA; and, improvements to the existing CMFHA potable water infrastructure.

The California Regional Water Quality Control Board, Lahontan Region is conducting the environmental review anticipatory to issuing discretionary revised individual waste discharge requirements for the wastewater treatment system and its inputs, including any residuals from domestic supply water treatment.

PUBLIC REVIEW and COMMENT PERIOD (30 Days):

STARTING DATE: January 24, 2011; **ENDING DATE:** February 23, 2011

NOTICE IS HEREBY GIVEN that the California Regional Water Quality Control Board, Lahontan Region intends to adopt a California Environmental Quality Act (CEQA) Negative Declaration at the public meeting scheduled for April 13-14, 2011, for the Department of the Navy, United States Marine Corps's, Coleville Military Family Housing Area Facilities Improvements Project in accordance with the CEQA Guidelines.

Attachment: Initial Study/Negative Declaration: Coleville Military Family Housing Area Facilities Improvements Project – Summary and CD of document

040052

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: COLEVILLE MILITARY FAMILY HOUSING AREA

Lead Agency: Regional Water Quality Control Board, Lahontan Contact Person: Alan Miller
 Mailing Address: 2501 Lake Tahoe Boulevard Phone: 530-542-5430
 City: South Lake Tahoe Zip: 96150 County: El Dorado

Project Location: County: Mono City/Nearest Community: Coleville
 Cross Streets: US Highway 395 and Champagne Avenue Zip Code: 93517-9802
 Longitude/Latitude (degrees, minutes and seconds): 38 ° 35'14" 019 " N / 119 ° 30'56" 613 " W Total Acres: 29
 Assessor's Parcel No.: N/A Section: _____ Twp.: _____ Range: _____ Base: _____
 Within 2 Miles: State Hwy #: US Highway 395 Waterways: West Walker River
 Airports: N/A Railways: N/A Schools: N/A

Document Type:

- | | | | |
|---|--|------------------------------------|--|
| CEQA: <input type="checkbox"/> NOP | <input type="checkbox"/> Draft EIR | NEPA: <input type="checkbox"/> NOI | Other: <input type="checkbox"/> Joint Document |
| <input type="checkbox"/> Early Cons | <input type="checkbox"/> Supplement/Subsequent EIR | <input type="checkbox"/> EA | <input type="checkbox"/> Final Document |
| <input checked="" type="checkbox"/> Neg Dec | (Prior SCH No.) _____ | <input type="checkbox"/> Draft EIS | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Mit Neg Dec | Other: _____ | <input type="checkbox"/> FONSI | _____ |

Local Action Type:

- | | | | |
|---|---|--|---|
| <input type="checkbox"/> General Plan Update | <input type="checkbox"/> Specific Plan | <input type="checkbox"/> Rezone | <input type="checkbox"/> Annexation |
| <input type="checkbox"/> General Plan Amendment | <input type="checkbox"/> Master Plan | <input type="checkbox"/> Prezone | <input type="checkbox"/> Redevelopment |
| <input type="checkbox"/> General Plan Element | <input type="checkbox"/> Planned Unit Development | <input type="checkbox"/> Use Permit | <input type="checkbox"/> Coastal Permit |
| <input type="checkbox"/> Community Plan | <input checked="" type="checkbox"/> Site Plan | <input type="checkbox"/> Land Division (Subdivision, etc.) | <input type="checkbox"/> Other: _____ |

Development Type:

- | | |
|--|---|
| <input type="checkbox"/> Residential: Units _____ Acres _____ | <input type="checkbox"/> Transportation: Type _____ |
| <input type="checkbox"/> Office: Sq.ft. _____ Acres _____ Employees _____ | <input type="checkbox"/> Mining: Mineral _____ |
| <input type="checkbox"/> Commercial: Sq.ft. _____ Acres _____ Employees _____ | <input type="checkbox"/> Power: Type _____ MW _____ |
| <input type="checkbox"/> Industrial: Sq.ft. _____ Acres _____ Employees _____ | <input type="checkbox"/> Waste Treatment: Type <u>Tertiary</u> MGD <u>0.050</u> |
| <input type="checkbox"/> Educational: _____ | <input type="checkbox"/> Hazardous Waste: Type _____ |
| <input type="checkbox"/> Recreational: _____ | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Water Facilities: Type <u>Groundwater</u> MGD <u>0.001624</u> | |

Project Issues Discussed in Document:

- | | | | |
|--|--|---|--|
| <input checked="" type="checkbox"/> Aesthetic/Visual | <input type="checkbox"/> Fiscal | <input type="checkbox"/> Recreation/Parks | <input checked="" type="checkbox"/> Vegetation |
| <input checked="" type="checkbox"/> Agricultural Land | <input checked="" type="checkbox"/> Flood Plain/Flooding | <input checked="" type="checkbox"/> Schools/Universities | <input checked="" type="checkbox"/> Water Quality |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Forest Land/Fire Hazard | <input checked="" type="checkbox"/> Septic Systems | <input checked="" type="checkbox"/> Water Supply/Groundwater |
| <input checked="" type="checkbox"/> Archeological/Historical | <input checked="" type="checkbox"/> Geologic/Seismic | <input checked="" type="checkbox"/> Sewer Capacity | <input checked="" type="checkbox"/> Wetland/Riparian |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Minerals | <input checked="" type="checkbox"/> Soil Erosion/Compaction/Grading | <input type="checkbox"/> Growth Inducement |
| <input type="checkbox"/> Coastal Zone | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Solid Waste | <input checked="" type="checkbox"/> Land Use |
| <input checked="" type="checkbox"/> Drainage/Absorption | <input type="checkbox"/> Population/Housing Balance | <input checked="" type="checkbox"/> Toxic/Hazardous | <input type="checkbox"/> Cumulative Effects |
| <input type="checkbox"/> Economic/Jobs | <input checked="" type="checkbox"/> Public Services/Facilities | <input type="checkbox"/> Traffic/Circulation | <input type="checkbox"/> Other: _____ |

Present Land Use/Zoning/General Plan Designation:

Resource Management

Project Description: (please use a separate page if necessary)

The Proposed Project would involve the following three structural and infrastructure improvements to the CMFHA Figure 3 shows the locations of the proposed project improvements. Each of the components listed and described below are identified in the figure. Improvements to the existing CMFHA wastewater treatment system and removal of the existing septic systems in accordance with Mono County requirements; Modifications to the existing storm water drainage and runoff infrastructure at the CMFHA; and, Improvements to the existing CMFHA potable water infrastructure.

040053

Note. The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X".
If you have already sent your document to the agency please denote that with an "S".

- | | |
|--|---|
| <input checked="" type="checkbox"/> Air Resources Board | <input type="checkbox"/> Office of Emergency Services |
| <input type="checkbox"/> Boating & Waterways, Department of | <input checked="" type="checkbox"/> Office of Historic Preservation |
| <input type="checkbox"/> California Highway Patrol | <input type="checkbox"/> Office of Public School Construction |
| <input checked="" type="checkbox"/> Caltrans District # <u>9</u> | <input type="checkbox"/> Parks & Recreation, Department of |
| <input type="checkbox"/> Caltrans Division of Aeronautics | <input type="checkbox"/> Pesticide Regulation, Department of |
| <input type="checkbox"/> Caltrans Planning | <input type="checkbox"/> Public Utilities Commission |
| <input type="checkbox"/> Central Valley Flood Protection Board | <input checked="" type="checkbox"/> Regional WQCB # <u>6</u> |
| <input type="checkbox"/> Coachella Valley Mtns. Conservancy | <input checked="" type="checkbox"/> Resources Agency |
| <input type="checkbox"/> Coastal Commission | <input type="checkbox"/> S.F. Bay Conservation & Development Comm. |
| <input type="checkbox"/> Colorado River Board | <input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy |
| <input type="checkbox"/> Conservation, Department of | <input type="checkbox"/> San Joaquin River Conservancy |
| <input type="checkbox"/> Corrections, Department of | <input type="checkbox"/> Santa Monica Mtns. Conservancy |
| <input type="checkbox"/> Delta Protection Commission | <input type="checkbox"/> State Lands Commission |
| <input type="checkbox"/> Education, Department of | <input type="checkbox"/> SWRCB: Clean Water Grants |
| <input type="checkbox"/> Energy Commission | <input checked="" type="checkbox"/> SWRCB: Water Quality |
| <input checked="" type="checkbox"/> Fish & Game Region # <u>6</u> | <input type="checkbox"/> SWRCB: Water Rights |
| <input type="checkbox"/> Food & Agriculture, Department of | <input type="checkbox"/> Tahoe Regional Planning Agency |
| <input type="checkbox"/> Forestry and Fire Protection, Department of | <input type="checkbox"/> Toxic Substances Control, Department of |
| <input type="checkbox"/> General Services, Department of | <input checked="" type="checkbox"/> Water Resources, Department of |
| <input type="checkbox"/> Health Services, Department of | <input checked="" type="checkbox"/> Other: <u>US Army Corps of Engineers, Reno Office</u> |
| <input type="checkbox"/> Housing & Community Development | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Integrated Waste Management Board | |
| <input type="checkbox"/> Native American Heritage Commission | |

Local Public Review Period (to be filled in by lead agency)

Starting Date 1/24/2011 Ending Date 2/23/2011

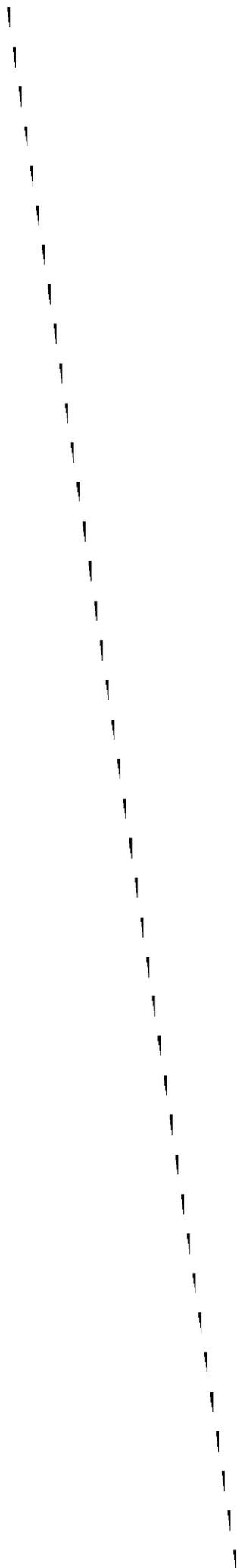
Lead Agency (Complete if applicable):

Consulting Firm: <u>PBS&J</u>	Applicant: <u>Camp Pendleton & Quantico Housing, LLC</u>
Address: <u>1410 Rocky Ridge Drive, Ste 190</u>	Address: <u>139 Santa Rosa Drive</u>
City/State/Zip: <u>Roseville, CA 95661</u>	City/State/Zip: <u>Oceanside, California 92508</u>
Contact: <u>Dave Beauchamp</u>	Phone: <u>760-400-0056</u>
Phone: <u>916-782-7275</u>	

Signature of Lead Agency Representative: *Alan Miller* Date: 1/21/2011

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

040054



COLEVILLE MILITARY FAMILY HOUSING AREA
FACILITIES IMPROVEMENTS PROJECT

Initial Study/Negative Declaration

Prepared for
California Regional Water Quality Control Board
Lahontan Region, Region 6
2501 Lake Tahoe Boulevard
South Lake Tahoe, California 96150

Prepared by
PBS&J an **Atkins** company
1410 Rocky Ridge Road, Ste. 190
Roseville, California 95661

January 2011

040055

010017

040056

NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION
(Pursuant to CEQA Section 21092 and CEQA Guidelines Section 15072)

PROJECT TITLE: Coleville Military Family Housing Area Facilities Improvements Project

APPLICANT: California Regional Water Quality Control Board, Lahontan Region

PROJECT LOCATION: Unincorporated Mono County, California

PROJECT DESCRIPTION:

The Proposed Project would involve the following three structural and infrastructure improvements to the CMFHA Improvements to the existing CMFHA wastewater treatment system and removal of the existing septic systems in accordance with Mono County requirements; Modifications to the existing storm water drainage and runoff infrastructure at the CMFHA; and, Improvements to the existing CMFHA potable water infrastructure.

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PUBLIC REVIEW and COMMENT PERIOD (30 Days):

STARTING DATE: January 24, 2011

ENDING DATE: February 23, 2011

NOTICE IS HEREBY GIVEN that the California Regional Water Quality Control Board, Lahontan Region intends to adopt a California Environmental Quality Act (CEQA) Negative Declaration. In April 2011 for the Department of the Navy, United States Marine Corps's, Coleville Military Family Housing Area Facilities Improvements Project in accordance with the CEQA Guidelines.

ADDRESS WHERE COPIES OF THE PROPOSED NEGATIVE DECLARATION, INITIAL STUDY AND REFERENCE ARE AVAILABLE FOR REVIEW:

California Regional Water Quality Control Board, Lahontan Region
2501 Lake Tahoe Boulevard, South Lake Tahoe, California 96150
Alan Miller, PE - Chief, North Basin Regulatory Unit; Telephone: (530) 542-5430
http://www.swrcb.ca.gov/lahontan/board_info/agenda/upcoming.shtml#apr11

The project site is not present on any of the lists enumerated under section 65962.5 of the government code.

040057

040058

011113

COLEVILLE MILITARY FAMILY HOUSING AREA
FACILITIES IMPROVEMENTS PROJECT

Initial Study/Negative Declaration

Prepared for
California Regional Water Quality Control Board
Lahontan Region, Region 6
2501 Lake Tahoe Boulevard
South Lake Tahoe, California 96150

Prepared by
PBS&J an **Atkins** company
1410 Rocky Ridge Road, Ste.190
Roseville, California 95661

January 2011

040050
[unclear]

040060

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TABLE OF CONTENTS

II. Environmental Factors Potentially Affected	15
III. Determination	16
IV. Evaluation of Environmental Impacts.....	17
I. Aesthetics	20
II. Agriculture and Forest Resources.....	23
III. Air Quality	26
IV. Biological Resources	31
V. Cultural Resources	41
VI. Geology and Soils	43
VII. Greenhouse Gas Emissions.....	46
VIII. Hazards and Hazardous Materials	49
IX. Hydrology and Water Quality.....	53
X. Land Use and Planning	62
XI. Mineral Resources.....	64
XII. Noise	65
XIII. Population and Housing	71
XIV. Public Services.....	73
XV. Recreation.....	74
XVI. Transportation/Traffic.....	75
XVII. Utilities and Service Systems.....	78
XVIII. Mandatory Findings of Significance	82

FIGURES

Figure 1 Regional Location Map	12
Figure 2 Aerial of Existing CMFHA and Proposed USMC Projects Located on Adjacent Federally-Owned Land	13
Figure 3 Proposed Project Conceptual Plan and Proposed USMC Projects Located on Adjacent Federally-Owned Land	14
Figure 4 Sensitive Species Occurrences within Five-Mile Radius.....	36

040061

TABLES

Table 1 Maximum Daily Construction Emissions 27
Table 2 Maximum Daily Operational Emissions 29
Table 3 CAPCOA Suggested Thresholds for Greenhouse Gases 48
Table 4 Typical Construction Equipment Noise Levels 67
Table 5 Vibration Source Levels for Construction Equipment 69

APPENDICES

Appendix A Air Quality Calculations
Appendix B Results of Reconnaissance Level Natural Resources Survey Vegetation
Survey - Coleville Military Family Housing Area September 2009

040062

January 2011

**INITIAL STUDY/ENVIRONMENTAL CHECKLIST AND
NEGATIVE DECLARATION**

This Initial Study/Environmental Checklist and Negative Declaration have been prepared in accordance with the California Public Resources Code, Section 21080(c) and California Code of Regulations (CCR), Title 14, Sections 15070 and 15071.

Project Information, Background and Description

Project Title:

Coleville Military Family Housing Area Facilities Improvements Project

Project Location:

The Coleville Military Family Housing Area (CMFHA) is located on federally-owned land in the Antelope Valley of the Eastern Sierra Nevada Mountains in northern Mono County, California, approximately 25 miles north of the Marine Corps Mountain Warfare Training Center (MCMWTC), located near Bridgeport, California (see Figure 1). The Project site is located in the northeastern portion of the CMFHA, north of Champagne Avenue, east of the residences along Mausert Avenue, and west of U.S. Highway 395 (US 395). (see Figure 2).

General Plan Designation:

Resource Management/Government Land

Zoning:

Resource Management

Surrounding Land Uses and Setting (Briefly describe the project's surroundings):

The area surrounding the CMFHA is largely open space with some agricultural and rural residential uses located to the east. Immediately surrounding the Proposed Project site are the residences of the CMFHA. The CMFHA itself is approximately 68.5 acres and provides 111 residential units (a combination of duplex and fourplex townhomes), a community center, indoor swimming pool, fitness area, playfield, outdoor basketball court, housing office, country store, and guard shack (see Figure 2). Agricultural fields are located across US 395 from the CMFHA.

Lead Agency Name, Address and Contact Person:

California Regional Water Quality Control Board, Lahontan Region (Water Board)
2501 Lake Tahoe Boulevard, South Lake Tahoe, California 96150

Contact Person and Phone Number:

Rob Tucker; Telephone: (530) 542-5424

Decision Making Body: Water Board

Project Applicant's Name and Address:

Camp Pendleton & Quantico Housing, LLC,
139 Santa Rosa Drive, Oceanside, California 92508.

Attention: Dane Baker

Project Objectives:

In order to provide better services to local military personnel (active and retired) and their families within Mono County, new and improved facilities are recommended within the limits of the CMFHA. The following objectives have been identified for the Proposed Project:

- Provide sufficient wastewater treatment capability to serve land uses (existing and proposed) within the CMFHA;
- Improve the quality and level of treatment of wastewater flows at the CMFHA; and,
- Enhance the reliability of potable water services at the CMFHA.

Project Description:

The Proposed Project would involve the following three structural and infrastructure improvements to the CMFHA Figure 3 shows the locations of the proposed project improvements. Each of the components listed and described below are identified in the figure.

- Improvements to the existing CMFHA wastewater treatment system and removal of the existing septic systems in accordance with Mono County requirements;
- Modifications to the existing storm water drainage and runoff infrastructure at the CMFHA; and,
- Improvements to the existing CMFHA potable water infrastructure.

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Additionally, the United States Marine Corps (USMC) is constructing two other improvements on adjacent federal land, which would connect to the wet utility systems located within the CMFHA:

- Construction and operation of a commissary, and
- Operation of a Child Development Center (CDC).

The USMC has sole control of the design, construction, and operation of these two facilities on federal land, which do not involve the Project applicant and are not subject to approvals or conditions by state or local agencies. However, although the Proposed Project is primarily intended to improve the existing wastewater treatment system serving the CMFHA, it is also designed to connect to and accommodate the new demand associated with the USMC commissary and CDC. Accordingly, Water Board staff requested and the Project applicant agreed that this document should consider potentially significant environmental impacts of the USMC's improvements as part of the analysis of the impacts associated with the Proposed Project.

The Water Board is conducting this analysis anticipatory to issuing discretionary revised individual waste discharge requirements for the wastewater treatment system and its inputs, including any residuals from domestic supply water treatment. In addition, the Water Board has discretionary regulatory authority with regard to Clean Water Act section 401 water quality certification, and issuance of permit coverage under certain other general permits previously issued by the State Water Resources Control Board and/or Lahontan Water Board, as disclosed in the table on page 11.

Wastewater Treatment System Improvements

Current wastewater treatment at the CMFHA occurs via a primary treatment system that is made up of four 7,600-gallon-capacity septic tanks and a leach field area with two existing leach fields. The total permitted capacity of the existing system is 39,000 gallons per day (gpd) of effluent. Wastewater enters the septic tanks via pipes and then flows to the leach field area via gate valves. Normally, a system technician rotates the flow of wastewater effluent through the four septic tanks and two leach fields so that one leach field receives wastewater effluent for two days while wastewater effluent percolates into the other leach field. The current wastewater system usually operates on a satisfactory basis; however, on occasion, the leach fields do not percolate quickly enough and wastewater effluent backs up towards the septic tanks. This is a strong indicator that the leach fields are at or beyond their absorptive capacity and are reaching the end of their lifecycle. The current wastewater treatment system does not have a safety buffer treatment capacity for existing conditions, nor can it accommodate anticipated future wastewater requirements associated with components of the

Proposed Project. Therefore, there is a potential to exceed the existing wastewater discharge permit thresholds.

Under the Proposed Project, the septic tank and leach field system would be replaced with a prefabricated wastewater treatment plant ("package") system with a 50,000-gallon-per-day capacity, which would be capable of adequately treating existing and planned wastewater treatment demands of the CMFHA, including those associated with the proposed USMC commissary and CDC. The proposed wastewater improvement capacity of 50,000 gpd does not need to match the 105,000 maximum daily water demand because a significant portion of maximum daily water demand is associated with irrigation water that does not discharge to the wastewater treatment system. In addition, the equalization tank included as a component of the proposed wastewater treatment facility will allow the proposed system to accommodate normal wastewater volume fluctuation. The existing septic system contents would be pumped out into the treatment system and the septic tanks would be removed in accordance with Mono County code requirements.

Package wastewater treatment plants are pre-engineered and pre-fabricated to handle a variety of flow rates and loadings to meet discharge requirements. Visually, the package treatment plant would resemble a modified shipping container. For structural purposes it would be mounted on a concrete foundation and built into the hillside of the northeastern portion of the CMFHA. The appearance of the package treatment plant would be enhanced and partially screened from view by landscaping that would be planted upon completion of construction.

Wastewater entering the package treatment plant would receive tertiary treatment – a level designed to degrade the nitrogenous biological content of the sewage derived from human waste, food waste, soaps, and detergents – before discharging from the package treatment plant. Effluent leaving the treatment plant would be run through a new low-pressure, underground effluent disposal system that would distribute the effluent to either the existing leach field area (west of the proposed wastewater treatment plant) or to the proposed leach field (east of the proposed wastewater treatment plant). To accommodate the effluent flows of the proposed facilities, the existing playfield, which also functions as the existing leach field area, would be removed and revegetated as open space with native grasses and other vegetation for use as an upgraded leach field with a new perimeter liner.

With the conversion of the CMFHA from a septic system to an on-site wastewater treatment facility, sludge would be removed from the proposed facility by truck every one to three months.

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The Proposed Project would also involve the installation of a propane-fueled emergency (backup) generator and a flow equalization tank adjacent to the proposed wastewater treatment plant that would balance large variations in flow and organic loading to keep the plant operating at its peak efficiency. In addition, two 4-inch diameter sewer force mains would be installed by the USMC along Champagne Avenue that would convey flows from the planned USMC commissary and CDC.

Treatment

As wastewater enters the plant for treatment, heavier solid materials sink to the bottom of the settlement chamber where they become sludge. This sludge is removed to a separate digester that degrades the sludge by aerobic bacterial action before offsite disposal at a suitable permitted facility. In the aeration chamber of the wastewater treatment process, the forceful mixing of wastewater with oxygen and bacteria provides treatment for the remaining degradable pollutants. In the clarification chamber, gravity separates the activated sludge from the water. The wastewater will then flow into an anoxic treatment chamber that would further reduce nitrate concentrations in the wastewater, and a series of sand filters after the clarification chamber would provide additional fine particle removal. Finally, a pump sends the tertiary-treated effluent to an underground effluent disposal system at the repurposed playfield area, or to the east of the proposed wastewater treatment plant in either proposed leach field. The leach field will be constructed to allow for infiltration of the treated effluent and each of the below-grade slopes will be lined with a new perimeter liner to segregate the treated effluent from the storm water retention basin. Specifically, on the downhill side of the leach field, closest to the storm water retention basin the perimeter liner will be up to five (5) feet deep. As designed, this perimeter liner will prevent treated effluent interaction with storm water runoff during periods of seasonal high flow discharges to the storm water retention basin.

The existing wastewater effluent disposal method has increased nitrate concentrations in the ground water beneath the leach fields. Under the Proposed Project, the level of wastewater treatment at the CMFHA would be upgraded to a "tertiary" level with regard to nitrogen treatment and effluent would be discharged via an underground effluent disposal system. In addition, water and nitrogen uptake by vegetation that would overlay the underground effluent disposal system would occur during the growing season in this vegetated area and further reduce nitrate concentrations in the underlying ground water. The tertiary-treated effluent would represent an improvement in the quality of the wastewater effluent reaching the ground water, including reduced nitrate concentrations and reduced impacts to ground water quality.

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Potable Water Delivery System Improvements

The existing CMFHA potable water system consists of five ground water wells with a total production capacity of approximately 177 gallons per minute (gpm). However, the drinking water treatment facility has a permit restriction of a maximum of 90 gpm [California Department of Public Health, 2001]. Three of these wells (Wells #1, #4, and #5) are operational; the other two wells (Wells #2 and #3) have been permanently disconnected from the water collection system piping due to high, naturally-occurring concentrations of uranium in the ground water. With respect to Well #5, trace concentrations of arsenic, which is also naturally occurring and a result of the weathering of granitic rocks in the area, necessitates additional treatment, which is expensive and process-intensive. As a result, the use of Well #5 is largely restricted to summer months, when the demand for potable water is high. This minimizes annual costs associated with on-site ground water treatment.

Ground water from Wells #1 and #4 (and occasionally Well #5) flows via a water treatment system to a series of three water tanks with a combined reservoir capacity of approximately 370,000 gallons. Water entering and leaving the treatment system is sampled and evaluated to ensure the potable water meets all applicable drinking water standards. The treatment system has two pressure tanks containing media filters that remove impurities from the ground water and produces potable water that complies with all applicable drinking water regulations.

Wastewater generated during the initial rinse of new filter media removes fine particles produced by abrasion during transportation and media installation. Only one filter media vessel is rinsed at a time. Filter media is anticipated to require change-out and rinsing approximately three to six times per year depending on seasonal demand. The new media rinsing process produces an estimated of 60,000 to 70,000 gallons of rinse water. The rinse water will continue to be disposed of in the on-site storm water retention basin located on the northeast corner of the facility. If the basin received all 70,000 gallons of rinse water, this would account for approximately thirty percent of basin capacity. Visual and flow volume monitoring on the retention basin will occur during rinse water discharges to the retention basin.

The filter media rinsing process will only occur when standing water is not present in the storm water retention basin; typically this would occur in the dry summer months and/or when there is less than a 30 percent chance of precipitation at the Project site over the next three days as forecasted by the National Weather Service. As described this would ensure percolation of the rinse water into the ground water system and would prevent discharge from the storm water retention basin as surface water flow. Monitoring during

discharge of rinse water generated from rinsing of new filter media is limited to visual and flow volume monitoring. The WDR allows up to 100,000 gallons of filter media rinse water discharges, which is sufficient to meet the filter media rinsing estimates of 60,000 to 70,000 gallons. In addition, if the retention basin capacity would not accommodate rinse water discharges, the WDR allows for discharges of rinse water waste directly to the effluent dispersion system and infiltration disposal areas in accordance with any Water Board requirements. Rinse water waste discharges should not result in ponding or overwhelming the infiltration capacity or rate of infiltration.

Waste/spent media associated with drinking water treatment is removed and disposed of off-site in a permitted landfill facility.

Of the 370,000-gallon volume potable water storage capacity, 130,000 gallons is reserved for fire protection; the balance is available for drinking water. The typical maximum daily potable water system demand for the CMFHA is approximately 105,120 gpd; however, Wells #1 and #4 can only provide approximately 66,240 gpd. To address the current potable water supply/demand shortfall, restricted blending and treatment of water from Well #5 has typically been provided.

As part of the Proposed Project, the overall distribution efficiencies of the potable water system within the CMFHA would be increased. The project applicant would install new water service mains and a booster pump station to improve the distribution of potable water throughout the CMFHA. The project applicant would also construct a pre-manufactured building for the storage of drinking water filtration media and ancillary supplies. The existing treatment process at the CMFHA would remain the same as under existing conditions. As a result, no increase in waste material associated with water treatment, including well operation, would occur, and potable water supply/treatment operations would continue according to existing permit requirements.

To improve the quality of source water and help meet anticipated future potable water demand, the Proposed Project includes performing exploratory investigations at up to three locations in the northwestern portion of the Project site for a new potential source of ground water. To the extent feasible, during the exploratory investigations, any and all water that meets minimum drinking water quality standards that can be treated for use as drinking water would be captured and treated via the existing treatment system. Offsite discharges would not occur. In fact, ground water discovered and extracted during construction along with well development water that cannot be added to the drinking water supply would be discharged into the storm water basin during dry conditions when the water can percolate.

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If the exploratory investigations indicate a potential new source of ground water with higher quality than currently available from existing onsite wells, the project applicant would construct and operate a new ground water supply well at that location, thereby resulting in lower ground water treatment costs. As such, the capacity for ground water pumping within the CMFHA would increase by up to 4,300 gpd as part of the Proposed Project. This represents a four percent increase over the existing average daily pumping rate of 105,120 gpd. Any and all water encountered during well construction would be handled similar to the process outlined above during the exploratory evaluations.

If, as noted above, a new well is ultimately constructed, Well #5 would remain operational (in standby status) but would be reserved for emergency purposes in the event of a failure at another on-site ground water well. The potential new well could improve the quality of the ground water entering the treatment system, resulting in additional treatment cost savings and potentially adding flexibility for meeting variations in potable water demand.

In addition, the Proposed Project would include the installation of a pre-manufactured building in the southwestern portion of the Project site for the storage of drinking water filtration media and ancillary supplies for the existing potable water treatment facility located in the southwestern portion of the Project site. The additional storage area is needed for maintenance and support of the existing water treatment system.

Proposed USMC Commissary

In addition to the Proposed Project, a USMC commissary and exchange building, of no more than 13,100 square feet (sf), would be constructed and operated by the USMC on approximately five acres in the southeastern portion of the CMFHA. The proposed commissary would include a receiving area, loading dock, meat and produce preparation areas, cold and frozen storage areas, an emergency generator, and electronic checkout registers. The proposed exchange would sell other items such as alcohol and non-food related purchases (clothing, electronics, etc.). Operating hours of the proposed commissary would occur between the hours of 10:00 a.m. and 6:00 p.m., Monday through Friday.

A segmented retaining wall would surround the proposed commissary and associated parking, and native vegetation would be provided along its exterior and between the proposed commissary and US 395 to provide visual screening to avoid significant adverse changes to the visual qualities of the existing landscape.

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Proposed USMC Child Development Center (CDC)

In addition to the Proposed Project, a new USMC CDC will be located south of the existing housing area storage facilities. The capacity of the new CDC would be approximately 94 pre-teen students. The new CDC would replace four existing housing units currently used by childcare providers. The four homes would be rolled back into the existing housing stock of the CMFHA. It should be noted that the structure in which the CDC would be located is already under construction by the USMC and will be completed shortly, prior to Water Board consideration of this IS/ND. As such, for the purposes of this analysis, the potential construction impacts associated with the structure are not subject to Water Board permitting discretion and are not assessed in this document. Wastewater inputs to the modified treatment plant from the proposed operation of the CDC are included in the analyses in this document.

Storm Water Drainage and Control Facilities

The CMFHA housing center consists of a 29-acre, mostly developed site with the necessary storm water controls. The controls and facilities currently collect and discharge onsite storm water runoff to an existing onsite retention basin located in the northeast corner of the 29-acre property (Figures 2 and 3).

In addition, there are two offsite areas (northwest [NW] and southwest [SW] upper mountain range drainage areas) that allow storm water to flow onsite and discharge to the existing retention basin. The NW mountain range drainage area is approximately 203 acres and the SW mountain range drainage area is approximately 120 acres. This resulted in the construction of a larger retention basin than is necessary to accommodate storm water flows from the onsite improvements.

Storm water run-off (overland or sheet flow) from the areas to the NW and SW of the project area and the storm water drainage from the project area are captured and temporarily detained in a man-made storm water retention basin on the project site. Off-site runoff to the storm water basin is estimated at 250,000 cubic feet or more from a 100-year, 24-hour storm. Onsite runoff from the CMFHA to the basin during this storm is estimated at 115,328 cubic feet (Apex, Sept. 30, 2010). Currently, the basin is designed to overflow by way of a 6-inch-diameter standpipe or emergency overflow spillway and drains under U.S. Highway 395 through a 24-inch diameter culvert. Storm water continues to flow via Alkali Ditch toward the West Walker River.

Modifications to the storm drainage system include reconfiguring a portion of the existing basin and reducing the basin surface area but would also deepen the remaining portions of the basin to retain the existing volume of 237,000 cubic feet. The existing

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concrete delivery channels would be modified and slightly extended as needed to deliver water to the retention basin, and the outlets would be refurbished in kind. Therefore, no long-term impacts would occur to the hydrologic regime associated with the retention basin.

Section 438 of the Energy Independence and Security Act of 2007(EISA) established strict storm water runoff requirements for federal development and redevelopment projects. This provision requires that federal development projects, the sponsor of any development or redevelopment project involving a Federal facility with a footprint that exceeds 5,000 square feet shall use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow.

The proposed project will comply with EISA Section 438. As such, it is necessary to maintain the existing capacity of 237,000 ft³. Therefore, as part of the proposed project; the existing retention basin would be reconfigured, a reduction in its lateral extent but then deepened by five (5) feet (with a 3:1 earthen berm) to maintain the existing 237,000 ft³ capacity and accommodate all of the current and project-related storm water flows. Storm water runoff would be rerouted to the configured basin as part of the Project. At this point, storm water will allowed to percolate and ultimately adding recharge potential to the ground water basin.

Schedule

Currently, construction of the proposed wastewater and potable water system upgrades are scheduled to begin in early spring 2011 and continue for approximately eight months through the fall of 2011. This will overlap and coincide with construction of the proposed commissary. As noted above, the proposed CDC has already been constructed and may be operational during construction of the other components listed above. All existing facilities would remain in place and operational until such time as the proposed facilities are operational. At that time, the existing facilities, such as the on-site septic tanks, would be removed and disposed of in accordance with Mono County code requirements.

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Other Public Agencies Whose Approval is Required

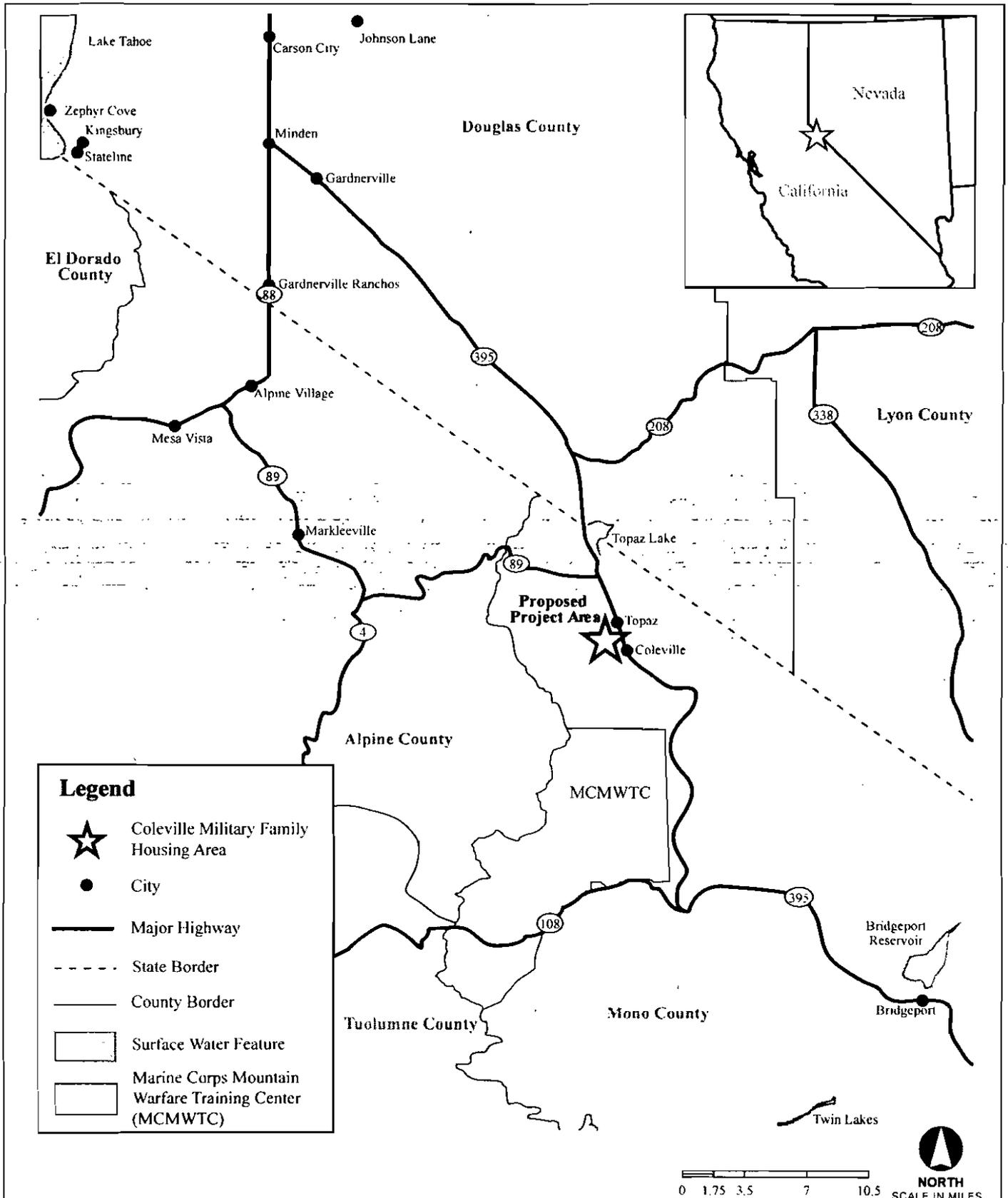
(e.g., permits, financing approval, or participation agreement):

Agency	Regulatory Requirement	Note
Department of Defense, USMC	National Environmental Policy Act	A Final Environmental Assessment and Finding of No Significant Impact (FONSI) for the Project at the CMFHA was issued by the USMC on September 17, 2010.
Department of Defense, USMC	Energy Independence and Security Act of 2007, Section 438	Requires federal agencies to develop and redevelop applicable facilities in a manner that maintains or restores storm water runoff to pre-development conditions to the maximum extent technically feasible.
Great Basin Unified Air Pollution Control District	Diesel Fired ICE Permit Application pursuant to Health and Safety Code Section 93115 (e)(4)(A)3	The proposed wastewater treatment facilities would include a propane-fueled emergency generator. A permit to operate application would be submitted to the Air Pollution Control District. As proposed, based on the anticipated size of the generator, a letter of exemption is anticipated.
State Water Resources Control Board	National Pollutant Discharge Elimination System General Permit For Storm Water Discharges Associated With Construction And Land Disturbance Activities, Order No. 2009-0009-DWQ	Regulates pollutants from construction activities resulting in one or more acres of land disturbance. Construction activity includes clearing, grading, demolition, excavation, construction of new structures, and reconstruction. Linear utility projects are also included. Requires online Permit registration. Additional information at: www.waterboards.ca.gov/water_issues/programs/stormwater .
State Water Resources Control Board	General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality, Order No. 2003-0003-DWQ	Regulates specified low threat discharges of waste to land with underlying ground water, including well boring wastes, clear water discharges from well pump test, small dewatering projects, and handling of inert wastes. Requires Notice of Intent or Application Form 200 to Regional Water Board with project plans and monitoring plans. Notice of Applicability issued by Regional Water Board.
State Water Resources Control Board or Lahontan Water Board	Clean Water Act section 401 State Water Quality Certification and/or general waste discharge requirements	Regulates any activity, which may result in a discharge to a water body. State Water Quality Certification requires the proposed activity to comply with state water quality standards. Certifications are issued in connection with U.S. Army Corps of Engineer section 404 permits for dredge and fill discharges.
Mono County	County Municipal Code	Permitting authority for public domestic water systems, construction and operation of ground water wells and construction and operation of domestic and public sewer systems.

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Source: Coleville MFH Area Utilities Upgrades, Final EA, August 2010.

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FIGURE 1
Regional Location Map

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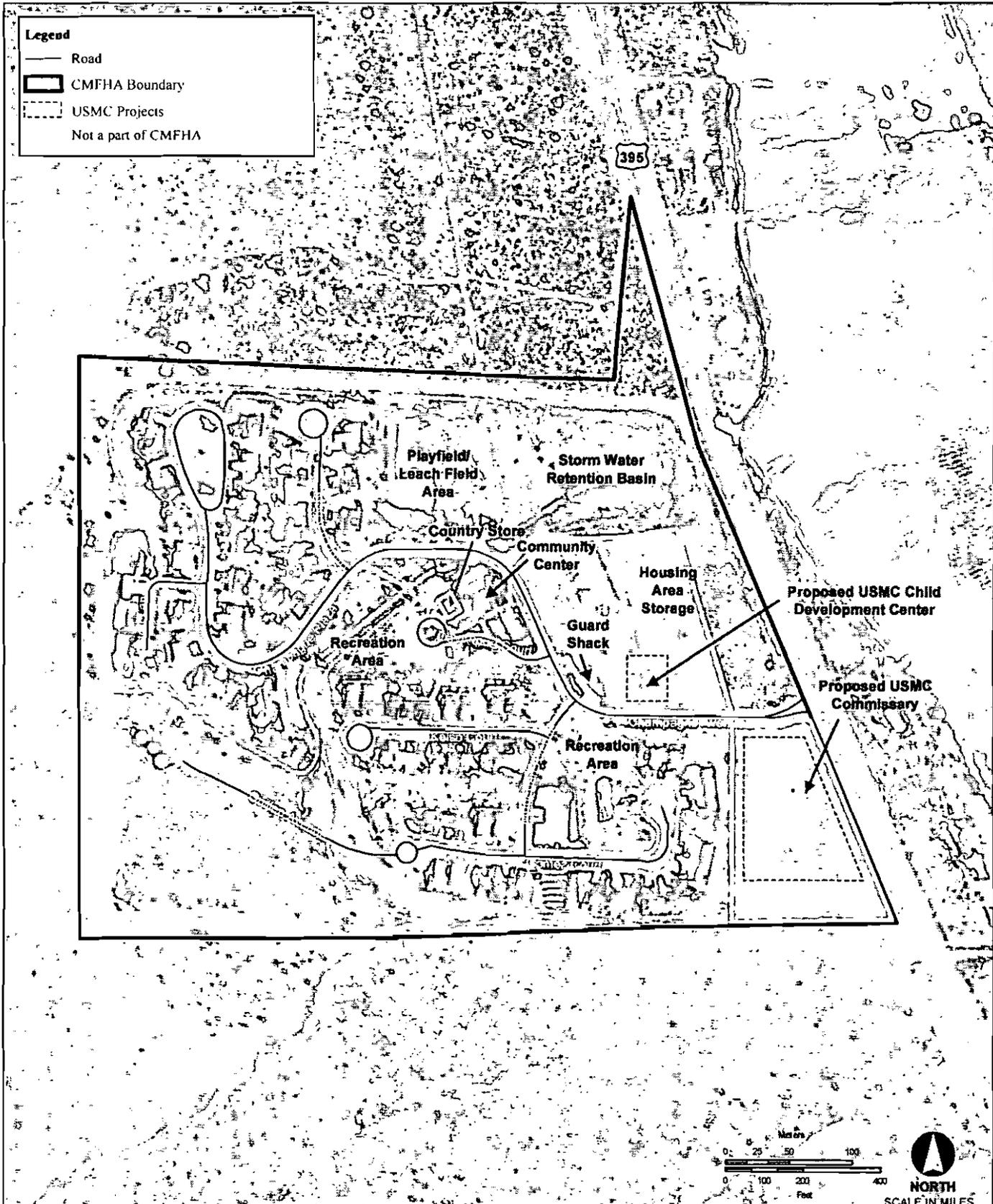
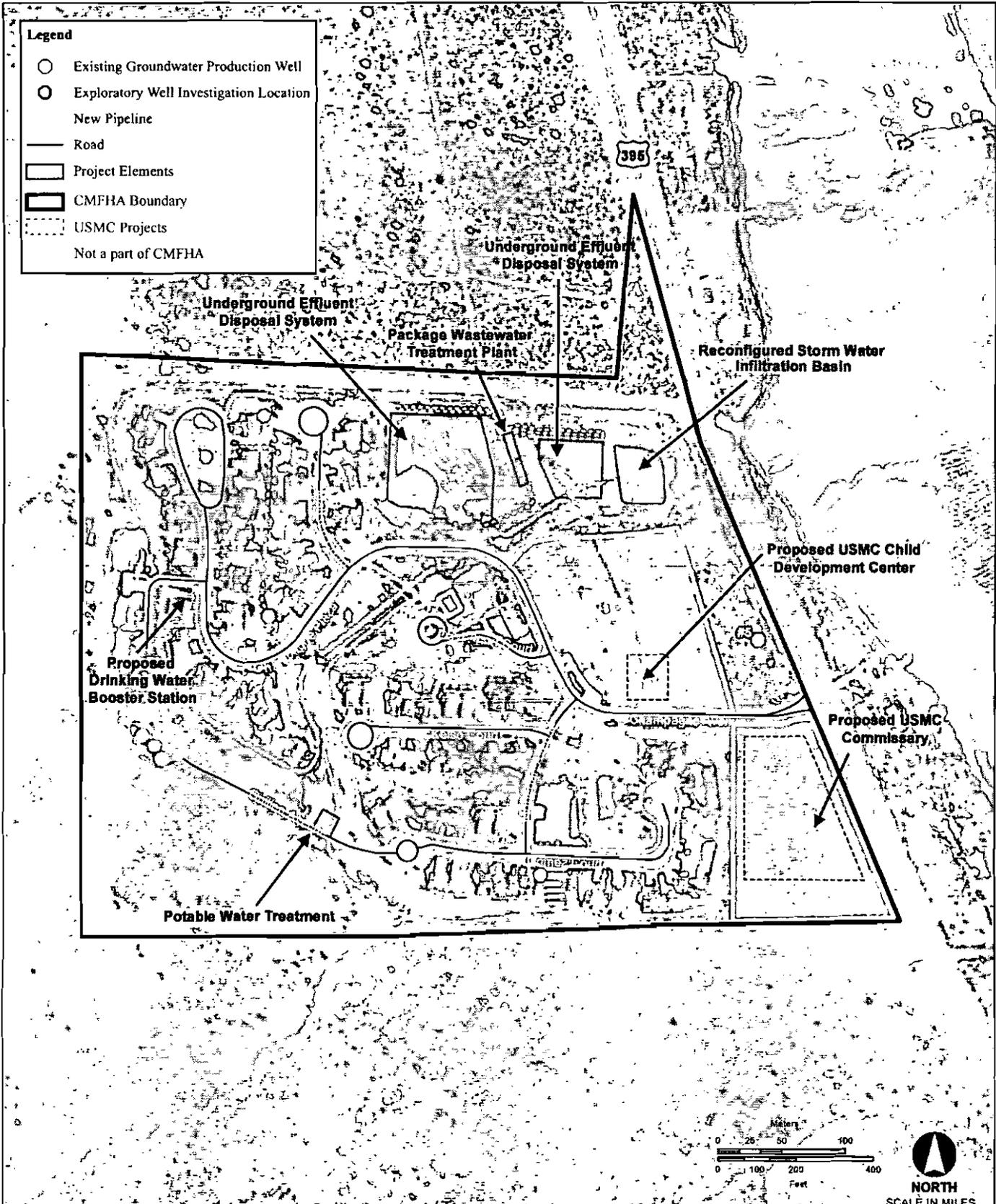


FIGURE 2
Aerial of Existing CMFHA and Proposed USMC Projects Located on Adjacent Federally-Owned Land

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Source: Coleville MFH Area Utilities Upgrades, Final EA, August 2010.



FIGURE 3
Proposed Project Conceptual Plan and Proposed USMC Projects Located on Adjacent Federally-Owned Land
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II. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|---|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Mandatory Findings of Significance |

III. DETERMINATION (to be Completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the Proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR OR NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.

Alan Miller
Signature

January 21, 2011
Date

Alan Miller
Printed Name

Lahontan Water Board
For

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IV. EVALUATION OF ENVIRONMENTAL IMPACTS

Introduction

The following Checklist contains the environmental checklist form presented in Appendix G of the CEQA Guidelines. The checklist form is used to describe the impacts of the Proposed Project. A discussion follows each environmental issue identified in the checklist. Included in each discussion are measures already incorporated into the Proposed Project, and therefore considered to be part of the Proposed Project for purposes of this Negative Declaration.

For this checklist, the following environmental significance designations are used:

Potentially Significant Impact: An impact that could be significant, and for which no mitigation has been identified. If any potentially significant impacts are identified, an EIR must be prepared.

Potentially Significant With Mitigation Incorporated: An impact that requires mitigation to reduce the impact to a less-than significant level.

Less-Than-Significant Impact: Any impact that would not be considered significant under CEQA relative to existing standards.

No Impact: The Proposed Project would not have any impact.

Presentation of Environmental Impact Discussion

- 1) A brief explanation is required for all answers except for "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on the project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant.

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"Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. CCR, Title 14, Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and

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- b) the mitigation measure identified, if any, to reduce the impact to less than significance.

Summary of Environmental Impact Discussion and Finding

Initial Study/Environmental Checklist: A draft Initial Study Checklist was prepared by PBS&J, the applicant's consultant, and provided to the Water Board by CPQH.

Mitigation Measures: No mitigation measures are required to address potential environmental impacts associated with the Proposed Project.

Environmental Finding: The Water Board has determined on the basis of the attached Initial Study/Environmental Checklist and the documents and sources referenced herein that the Proposed Project described above will not have a significant adverse impact on the environment.

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
I. AESTHETICS				
Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Significance: Less than Significant Impact				
<p>The Project site is located within the eastern portion of the Antelope Valley in Mono County. In general, the Antelope Valley viewshed is dominated by long-distance views of the surrounding mountains and meadows. US 395 is located immediately east of the CMFHA, and many of its associated features are visible from the highway. Much of US 395 is designated as a State and County Scenic Highway; however, the segment of highway adjacent to the CMFHA and the Project site is not designated as scenic.</p>				
<p>Implementation of the Proposed Project would result in short-term visual impacts as a result of on-site construction equipment and vehicles. However, these impacts would be localized and temporary, and any on-site construction equipment would be removed upon completion of construction activities. Furthermore, the Project site is located downgradient of the residences located to the south and east and would not be anticipated to affect long-distance views, even temporarily.</p>				
<p>The proposed USMC commissary would be located on adjacent federally-owned land approximately 100 feet from the westernmost travel lane of US 395 and would be visible to motorists along US 395, as well as residents located to the east and west. However, due to the topography of the project area, which increases in elevation in an east-west direction, long distance views from US 395 would not be impeded by implementation of the proposed project. Furthermore, native vegetation and a segmented retaining wall would be used to screen the proposed USMC commissary from view to ensure that long-distance views are not substantially and adversely affected.</p>				
<p>Similarly, the proposed wastewater treatment facilities would be visible, as at least a portion of the wastewater treatment plant itself would be aboveground. Other components of the wastewater facilities modifications that may be visible include the equalization tank and emergency generator. This Project feature would likely be visible to passing motorists on U.S. Highway 395 and from the adjacent residences at the CMFHA. However, as noted above, native vegetation would be planted to enhance the appearance of and partially screen the wastewater treatment plant and adjacent aboveground Project components from residents and passing motorists. Furthermore, the aforementioned grade separation between the residences located at</p>				

040083

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>the CMFHA and the Project site would ensure that long-distance views to the east and north are not substantially affected by the wastewater treatment facilities. With respect to the potable water system improvements, the proposed facilities would consist of low-lying structures of a scale and dimension that would be minimally visible to residences within the CMFHA. Long distance views would not be impeded by any of the proposed water facilities improvements.</p> <p>The CDC structure is built but not operational, and is considered to be an existing structure for the purposes of this analysis. The CDC-related element of the Proposed Project, the proposed wastewater flow, would not affect scenic vistas in the area as no additional structures would be erected that could impair long-distance views.</p> <p>As the Proposed Project would not substantially affect long-distance views from nearby receptors in the area and the portion of US 395 from which the Proposed Project would be visible is not considered a scenic route, impacts would be less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>As noted above, the Project site is located near US 395 and portions of the Project site are visible from this roadway. Much of US 395 is designated as a scenic highway, however the portion of US 395 located adjacent to the CMFHA is not considered scenic. In addition, no structures that would be erected as part of the Proposed Project would exceed 30 feet in height, and would not be anticipated to visually impair scenic resources in the Project area. Furthermore, it should be noted that any vegetation removed during construction of the Proposed Project would be limited to low-lying vegetation, and no mature trees would be removed. As a result, no impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p>				
<p>The Project site is located within the CMFHA, a community/developed area within the Antelope Valley. The area surrounding the CMFHA is largely open space with some agricultural and rural residential uses located to the east across US 395. As noted above under Item I.a., the Proposed Project is located downgradient of the existing residences on the CMFHA. Furthermore, the structures that would be visible to the existing residences to the south and west would be the commissary and the wastewater treatment plant.</p>				
<p>As noted in the Antelope Valley Area Plan (Mono County 2007), the County has an established goal to provide for the orderly growth within the valley that retains the rural environment and protects the area's scenic, recreational, agricultural, and natural resources. Along US 395 and between existing communities, planning should provide for limited development that is compatible with natural constraints in Antelope Valley's scenic qualities. Furthermore, projects should not have a substantial and demonstrable negative impact on visual resources (Mono County 2007). Several components of the Proposed Project would be visible and modify existing views in the immediate area. However, views from US 395 in the area of the Proposed Project looking west already include the existing CMFHA residences and accessory facilities. Therefore, although the Proposed Project would be expected to increase the level of development at the CMFHA, the proposed development would be consistent with the existing aesthetic qualities of the CMFHA and would be located within an existing community along US 395. Therefore, the Proposed Project would not be considered to result in a substantial and demonstrable negative impact with respect to visual resources.</p>				
<p>Furthermore, the existing playfield would be replaced with native vegetation and returned to open space. Any landscaping/vegetation that would be disturbed as a result of implementation of the Proposed Project would be replaced upon completion of construction and would be consistent with existing landscaping of the area in order to maintain the existing visual character of the CMFHA. As a result, the Proposed Project would not substantially degrade the existing visual character or quality of the site and its surroundings, and impacts would be less than significant.</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Mitigation Measures: No mitigation is required.</p>				
<p>d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>The Proposed Project would not create a new source of substantial light or glare that could adversely affect day or nighttime views in the area. The proposed USMC commissary, USMC CDC, and wastewater treatment facility would include night lighting during operation. However, any lighting would be restricted to low-light security/access lighting, which would be angled down and away from US 395 and the residences located to the west and south of the proposed uses. As a result, the Proposed Project would not result in substantial increases in or new sources of light or glare, and impacts would be less than significant.</p> <p>Mitigation Measures: No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>II. AGRICULTURE AND FOREST RESOURCES</p> <p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program in the California Resources Agency, to non-agricultural use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>Currently, the Project site consists of open space within the CMFHA and is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, no impact would occur.</p> <p>Mitigation Measures: No mitigation is required.</p>				
<p>b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>The Proposed Project site is not located on agricultural land and would not conflict with existing zoning or affect existing Williamson Act contracts, as no Williamson Act farmlands have been identified on the Project site. No impact would occur.</p> <p>Mitigation Measures: No mitigation is required.</p>				
<p>c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined by Public Resources Code section 4526)?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>As noted above, the Project site is part of the CMFHA, a residential community within Mono County, and is not zoned as forest land or timberland. As such, implementation of the Proposed Project would not conflict with existing zoning for, or cause rezoning</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>of forest lands, or timberlands, and no impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>d. Result in the loss of forest land or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>The Project site consists of the aforementioned playfield and open space within the CMFHA. Construction of the Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>As noted above, the Project site is not designated as farmland or forest land, and would, therefore, not result in the conversion of farmland to non-agricultural use, or of forest land to non-forest use. Therefore, no impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>III. AIR QUALITY</p> <p>Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations:</p> <p>Would the project:</p>				
<p>a. Conflict with or obstruct implementation of the applicable air quality plan?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>Regional air quality plans take into account local long-term projections and plans, including county and city general plans, in an effort to improve regional air quality over time. Conflicts with regional air quality plans arise where growth or land use change occurs or is proposed within a particular area, such that it exceeds what was planned for that area. The Proposed Project would enable a minimal level of growth in the region (4 residential units and 13,100 sf of commercial retail space), which would not exceed current growth projections for the County. Furthermore, the proposed USMC commissary would serve to reduce the length of vehicle trips associated with retail shopping by local military families, which would reduce the existing level of air contaminants associated with mobile source emissions in the region, consistent with regional air quality planning efforts. As such, the Proposed Project would not be anticipated to exceed the projections of any local/regional plans for the area. Therefore, potential conflicts with applicable regional air quality plans are not anticipated. Impacts would be less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>The Proposed Project would generate air pollutants as a result of construction and operation-related emissions. Construction emissions are generated by construction equipment and from dust stirred up during construction activity. Operational emissions are predominantly generated by vehicle trips associated with a particular project. Neither Mono County nor the Great Basin Unified Air Pollution Control District (GBUAPCD), which manages air quality within the Great Basin Valleys Air Basin</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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(GBVAB), have established numerical thresholds for assessing air quality impacts. The air quality management district that is closest to the Project area and that is climatologically similar to the Project area is the Mojave Desert Air Quality Management District (MDAQMD), which is responsible for the Mojave Desert Air Basin (MDAB) and located south of the Project site in portions of San Bernardino and Kern Counties. For that reason, the MDAQMD's numerical thresholds are used in this analysis to evaluate the potential significance of air quality impacts in the absence of other applicable standards.

Construction

Construction-related emissions would primarily be 1) dust generated from demolition, earthmoving, excavation, and other construction activities; 2) exhaust emissions from powered construction equipment; and, 3) motor vehicle emissions associated with construction equipment, worker commute, and materials import/export activities.

TABLE 1 MAXIMUM DAILY CONSTRUCTION EMISSIONS					
Construction Phase (as determined by assumed construction equipment)	Estimated Emissions (lbs/day)				
	Carbon Monoxide (CO)	Reactive Organic Gases (ROG)	Nitrous Oxides (NO _x)	Particulate Matter (PM ₁₀)	Fine Particulate Matter (PM _{2.5})
Phase 1 (Grading)	33.87	8.06	69.53	28.84*	8.10*
Phase 2 (Site Prep/Utility Installation)	21.82	4.59	35.97	1.99	1.82
Phase 3 (Construction)	15.90	4.00	29.48	1.60	1.47
<i>Maximum Daily Emissions</i>	<i>33.87</i>	<i>8.06</i>	<i>69.53</i>	<i>28.84</i>	<i>8.10</i>
Daily Threshold (lbs/day)	548	137	137	82	82
Significant Impact?	No	No	No	No	No
* - Reflects on-site use of water truck in conformance with MDAQMD Rule 401. Source: MDAQMD CEQA Guidelines 2009; PBS&J 2010.					

Emission levels for construction activities vary with the type of equipment, duration of use, operation schedules, and the number of construction workers. Table 1 presents the estimate construction emissions for the Proposed Project. Construction emissions were estimated using URBEMIS2007, an ARB-developed model for criteria air pollutants. Because MDAQMD's emissions thresholds are expressed in terms of pounds per day (lbs/day), the number and type of equipment that may operate on a given day or during a given period are critical when determining maximum daily emissions. For this reason, the construction period has been divided into three

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>phases based on assumed construction equipment usage. Refer to Appendix A for further clarification.</p> <p>As shown above, impacts are far below "Daily Threshold" values and construction of the Proposed Project would not exceed the cited thresholds for this Project at any time. Further, the following Project design features would be implemented to further ensure that impacts would be less than significant:</p> <ul style="list-style-type: none"> • The Project applicant would conduct activities such as seeding, planting and mulching with ground covers to revegetate and stabilize disturbed soils from erosion immediately following completion of construction. • Particulate matter emissions from construction activities would be moderated through dust reduction measures (e.g., watering of exposed soils, soil stockpiling, and soil stabilization). In addition, the construction contractor would ensure that the dust control methods administered to minimize dust are compliant with GBUAPCD Rules and Regulations, especially Rule 401. Compliance with Rule 401 is achieved by preventing visible particulate matter from being airborne beyond the property from which the emission originates and measures to achieve compliance, per GBUAPCD, may include maintaining paved streets free of dust, watering of the site, or use of chemical soil stabilizers. <p><u>Operation</u></p> <p>Operation of the Proposed Project would not be expected to substantially increase emissions at the CMFHA. The Proposed Project would result in an increase in criteria pollutants from area and mobile sources associated with operation of the proposed uses/improvements at the CMFHA. As noted above, propane-fueled generators for the proposed wastewater treatment plant and commissary would be located on-site but would only be used on a short-term basis (i.e., days) in the event of a power failure or other emergency condition. As such, the use of generators was not included in the daily emissions calculations for the Proposed Project.</p> <p>The amount of criteria pollutants that would be generated by operation of the project was calculated using the URBEMIS 2007 modeling program. As shown in Table 2, the Proposed Project would not result in a net increase of criteria pollutant emissions that would exceed the daily (lbs/day) thresholds. This would be a less-than-significant impact.</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact	
TABLE 2 MAXIMUM DAILY OPERATIONAL EMISSIONS					
Estimated Emissions (lbs/day)					
Emission Source Type	Carbon Monoxide (CO)	Reactive Organic Gases (ROG)	Nitrous Oxides (NO _x)	Particulate Matter (PM ₁₀)	Fine Particulate Matter (PM _{2.5})
Area	4.81	0.73	0.28	0.02	0.02
Mobile	37.44	3.77	4.23	6.44	1.25
<i>Maximum Daily Emissions</i>	42.25	4.50	4.51	6.46	1.27
Daily Threshold (lbs/day)	548	137	137	82	82
Significant Impact?	No	No	No	No	No
Source: MDAQMD CEQA Guidelines 2009; PBS&J 2010.					

Mitigation Measures:

No mitigation is required.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Significance: Less than Significant Impact

The Proposed Project would not substantially increase the production of any criteria pollutant in excess of the daily emissions thresholds listed in Tables 1 and 2. The thresholds discussed above are designed to ensure the future attainment of federal and state air quality standards within the local air basin and, to accomplish this, the thresholds assess a project's incremental contribution to the cumulative level of air quality in the region. As the Proposed Project would not exceed the thresholds identified above, it is reasonable to conclude that the Project's incremental contribution to criteria pollutant emissions is not cumulatively considerable, and the impact would be less than significant.

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>d. Expose sensitive receptors to substantial pollutant concentrations?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>Sensitive receptors are generally recognized as those land uses that are more susceptible to the effects of air pollution than are the population at large. Nearby sensitive receptors include the existing residences to the west and south of the Project site. However, as noted above under item b), the Proposed Project would not result in the emission of substantial air pollutants in excess of regional thresholds. As such, the Proposed Project would not be anticipated to expose nearby sensitive receptors to potentially substantial pollutant concentrations. Impacts would be less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>e. Create objectionable odors affecting a substantial number of people?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>Earthmoving activities during construction could create objectionable odors related to the use of heavy pieces of diesel-powered construction equipment and paving. However, standard construction practices, in terms of maintenance of equipment and fuel usage, would address any potential odors from temporary construction equipment.</p> <p>Operation of the Proposed Project would also not be anticipated to create objectionable odors that would affect a substantial number of people. Potential source of odors would be the proposed USMC commissary and the wastewater treatment facilities. Any potential odors associated with food handling and cooking from the USMC commissary would be contained within the immediate vicinity. Trash receptacles within the project area would be required to have lids that enable convenient collection and loading and would be emptied on a regular basis, in accordance with existing County practices for the collection of solid waste.</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>The proposed wastewater treatment facilities would operate as a closed system so that odors are mostly contained within the facilities themselves. The proposed aerated equalization tank will have independent air flow controls to balance the level of oxygen in the tank. The oxygen levels within the tank would be adjusted as needed to prevent anaerobic conditions and odor production, and wastewater flows would be added in the lower oxygenated portion of the tank to further reduce the possibility of odor production. With these features, impacts due to wastewater odors are less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>IV. BIOLOGICAL RESOURCES</p>				
<p>Would the project:</p>				
<p>a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p>				
<p>Existing Conditions</p>				
<p>The information used to prepare the existing biological setting was compiled from the California Natural Diversity Database, the California Native Plant Society, the US Fish and Wildlife Service (USFWS), and the two environmental assessments (EAs) prepared for the CMFHA.</p>				
<p>The Proposed Project would occur in areas identified as basin sagebrush, non-native/ornamental hardwood, shrub willow, and those developed with ornamental vegetation, including the existing playfield. The following provides a brief description of each of these habitat types.</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p><u>Annual Grasses and Forbs (Disturbed)</u></p>				
<p>The vegetation community is identified by the occurrence of annual grasses and forbs that are typically non-native and/or invasive or noxious. Within the Great Basin Ecological Province, this vegetation community ranges from approximately 4,000 to 10,800 feet, primarily in areas subjected to high disturbance. In the Project site, this vegetation community is common in areas previously exposed to construction activities, vehicle travel, and adjacent to residential units.</p>				
<p><u>Basin Sagebrush</u></p>				
<p>This vegetation community type is the most extensively mapped shrub type in the region and ranges from approximately 4,200 to 11,000 feet above mean sea level (msl). Big sagebrush (<i>Artemisia tridentata</i>) is the dominant species in this community, occupying more than 50 percent of the scrub canopy cover. Other species that occur in association with this vegetation community include rabbitbrush (<i>Ericameria nauseosa</i>), black sagebrush (<i>Artemisia nova</i>), bitterbrush (<i>Purshia tridentata</i>), curl-leaf mountain mahogany (<i>Cercocarpus ledifolius</i>), and whitethorn ceanothus (<i>Ceanothus cordulatus</i>). Singleleaf pinyon pine (<i>Pinus monophylla</i>) occurs naturally throughout this vegetation community and has also been planted as an ornamental in landscaped areas. The understory consists of barren ground and non-dominant herbaceous species. In developed areas, the understory is dominated by non-native herbaceous species such as cheat grass (<i>Bromus tectorum</i>) and storksbill (<i>Erodium cicutarium</i>), particularly along the fire roads that surround the proposed Project site.</p>				
<p><u>Basin Mixed Scrub</u></p>				
<p>The vegetation community is similar in species composition to the Basin Sagebrush vegetation community, except that no shrub species are dominant and overall shrub species diversity is greater. This vegetation community occurs on a variety of geologic substrates, generally at elevations above 4,600 feet. The southern portion of the Project site, where this vegetation community predominantly occurs, experienced a wildfire in 2007 that altered the species composition and structure. Common shrub species associated with this vegetation community in the Project site include big sagebrush, bitterbrush, rabbitbrush, black sagebrush, and green ephedra (<i>Ephdra viridis</i>). Charred remains of singleleaf pinyon pine are common in this vegetation community in the Project site. Kellogg's spurred lupine (<i>Lupinus caudatus</i> ssp. <i>montigenus</i>) and sulphur buckwheat (<i>Eriogonum umbellatum</i>) are common herbaceous components, occurring between shrub species. Numerous other native and non-native herbaceous species occur as understory components in this</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>vegetation community.</p> <p><u>Non-native/Ornamental Hardwood</u></p> <p>This vegetation community type includes non-natural communities dominated by ornamental or non-native hardwood tree species. Within the Project site, this vegetation community occurs just south of the playfield and is solely composed of Fremont cottonwood (<i>Populus fremontii</i>). Although Fremont cottonwood is a naturally occurring, native species in the region, the individuals that compose this vegetation community have been planted and maintained as landscaped trees.</p> <p><u>Shrub Willow</u></p> <p>This vegetation community type is dominated by shrub forms of willow species (<i>Salix</i> sp.) and occurs naturally in riparian, seep, and meadow sites. The small area of this vegetation community that extends into the Project site is located within the proposed storm water retention basin, and is entirely composed of narrowleaf willow (<i>Salix exigua</i>). The vegetation within the basin is markedly different from the less disturbed, natural vegetation surrounding it, and the occurrence of willow species appears to be induced as the result of artificial channeling of water into the basin.</p> <p><u>Saltbush</u></p> <p>This vegetation community, in which any combination of saltbush species (<i>Atriplex</i> spp.) forms the dominant shrub genus, occurs in widely scattered areas from Modoc to Inyo Counties. Both shadscale or spiny saltbush (<i>Atriplex confertifolia</i>) and four-wing saltbush (<i>A. canescens</i>) occur from northern Owens Valley to Kern County. In the Project site, spiny saltbush and four-wing saltbush, interspersed with rabbitbrush dominate this vegetation community.</p> <p><u>Black Cottonwood</u></p> <p>This vegetation community vegetation occurs in the northern Sierra Nevada more commonly than the Fremont Cottonwood vegetation community, but their ranges occasionally overlap. Over its broad range in California, this vegetation community may occur at elevations up to about 9,000 feet. Being shade intolerant, it requires freshly deposited alluvial materials for its maintenance in the absence of competing trees, and stands are often even-aged as a result of episodic flood events. This vegetation community is dominated by black cottonwood (<i>Populus balsamifera</i> ssp. <i>trichocarpa</i>) and willows (<i>Salix</i> spp.). In the Project site, understory vegetation is dominated by yarrow (<i>Achillea millefolium</i>) and tumble mustard.</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>During a site reconnaissance survey conducted on September 22, 2009 of the CMFHA, a certified wetlands biologist conducted a wetland determination for the area. The area met the parameter for hydrology; however, it did not meet the parameter for vegetation and hydric soils. Under contract with the Department of the Navy, a site reconnaissance level natural resources survey was conducted on September 22, 2009 for the Commissary project in the project area. A certified wetlands biologist (Wetland Delineator Program Certification - qualifies individuals to perform wetland delineations in accordance with the U.S. Army Corps of Engineers and Section 307(e) of the Water Resources Development Act of 1990) conducted a wetland determination for the project area. The wetlands biologist applied the three-parameter approach as stipulated by the Regional Supplement to the Corps Wetland Delineation Manual: Arid West Region (Version 2.0) (USACE 2008). In order to properly apply the three-parameter approach, the wetlands biologist completed the Corps' Arid West Wetland Datasheet Pit 1A-2009. Appendix B of this IS-ND presents the results of the September 2009 survey. As determined, the project area met the parameter for hydrology; however, it did not meet the parameters for wetland vegetation and hydric soils. Specifically, the Black Cottonwood vegetation community in the Project site is not considered riparian habitat. Therefore, the project area was determined not to be a wetland or to support wetland habitats.</p> <p><u>Developed with Ornamental Vegetation</u></p> <p>This vegetation community applies to all landscapes that are dominated by urban structures, residential units, or other developed land use elements such as roads and the existing playfield. This category also includes urban-related bare soil and non-native/ornamental vegetation that occur in areas adjacent to permanent structures and construction sites. Landscaped vegetation surrounding the residential units, areas cleared by mechanical grading, and the sidewalks and pavement associated with the CMFHA are included in this category.</p> <p><i>Special-Status Species</i></p> <p>The potential occurrence of special-status plant and animal species within the Project site and surrounding area has been determined through habitat information collected through a review of the CDFG's CNDDDB, the U.S. Fish and Wildlife Service (USFWS) online species list database, query of the California Native Plant Society (CNPS) list for the Coleville USGS 7.5 minute quadrangles, and from the August 2010 EA prepared for the Proposed Project. For the purposes of this section, special-status species include:</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<ul style="list-style-type: none"> • listed, proposed, or candidate species for listing as Threatened or Endangered by the USFWS pursuant to the Federal Endangered Species Act (FESA) of 1969, as amended; • listed as Rare, Threatened, or Endangered by the California Department of Fish and Game (CDFG) pursuant to the California Endangered Species Act (CESA) of 1970, as amended; • designated as Fully Protected under Sections 3511 (birds), 4700 (mammals), and 5050 (reptiles and amphibians) of the California Fish and Game Code; • designated by the CDFG as California Species of Concern; • plant species listed as Category 1B and 2 by the CNPS; and • not currently protected by statute or regulation, but considered rare, threatened or endangered under CEQA (Section 15380). <p>A total of nine status species, including two special-status plants, one special-status fish, one special-status amphibian, five special-status mammals have been recorded within five miles of the Project site (see Figure 4). It should be noted that the CNDDDB also maintains a list of sensitive natural community types. The CNDDDB query revealed no sensitive community types on the Coleville quad. Special status species that could potentially occur on or in vicinity of the Project site are discussed below.</p> <p><u>Plants</u></p> <p>No federally or state-listed plant species were detected during a vegetation survey conducted by TEC biologists on May 20, 2010. American manna grass (<i>Glyceria grandis</i>) is known to occur approximately 0.8 miles south of the Project site along the West Walker River, and the spiny milkwort (<i>Polygala subspinososa</i>) is known to occur approximately 1.4 miles northeast of the Project site in the Sweetwater Mountains. Both plants are considered special status species. American manna grass is typically found in wet meadows, ditches and streams. Spiny milkwort is found in Great Basin scrub and pinyon-juniper woodland. Both of these habitat types do not occur within the Project site. No other special-status plant species are considered potentially present at the Project site. As a result, special-status plant species are presumed to be absent, and therefore the Proposed Project would have no impact on special-status plant species.</p>				

040098

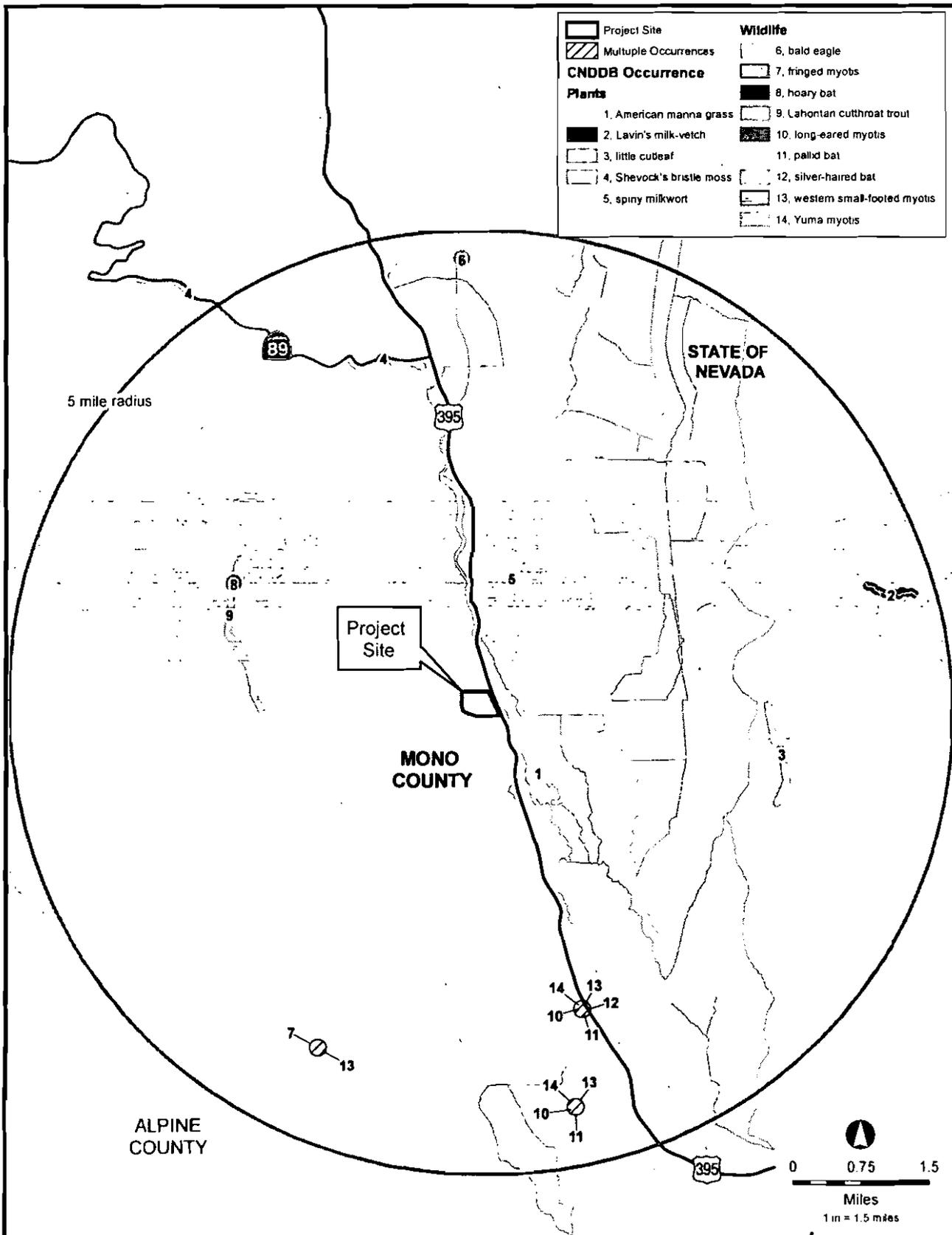


FIGURE 4

Sensitive Species Occurrences Within 5 Mile Radius



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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p><u>Terrestrial Wildlife</u></p> <p>One special-status fish, one special-status amphibian, and five special-status mammals have been recorded within five miles of the Project site (see Figure 4). No special-status wildlife species were detected during wildlife surveys conducted for the Proposed Project on September 22, 2009 and May 20, 2010. Furthermore, the Project site does not provide suitable habitat for Lahontan cutthroat trout (<i>Oncorhynchus clarkii henshawi</i>). Yosemite toad (<i>Anaxyrus canorus</i>) primarily frequents montane wet meadows, but also occurs in seasonal ponds associated with lodgepole pine and subalpine conifer forests. California wolverine (<i>Gulo gulo</i>) prefers areas with low human disturbance and use caves, hollows in cliffs, logs, rocky outcrops, and burrows for cover, generally in denser forest stages. The three bat species shown in Figure 4 are the fringed myotis (<i>Myotis thysanodes</i>), western small-footed myotis (<i>Myotis cilliolabrum</i>), and Townsend's big-eared bat (<i>Corynorhinus townsendii</i>), any of which could forage in the general area. However, the Project site does not contain habitat that could serve as bat-roosting sites.</p> <p>Suitable nesting habitat for migratory birds and raptors does occur in the proposed Project Site, in the Fremont cottonwood trees. All raptors are protected under Sections 3503 and 3511 of the Fish and Game Code, and by the Migratory Bird Treaty Act (MBTA). Due to the presence of suitable nesting and adjacent foraging habitat, raptor species and migratory birds could become established adjacent to the Project site prior to the start of construction activities. If raptors are nesting in trees adjacent to an area where construction has yet to begin, the disturbance created by heavy construction equipment could result in nest abandonment, which would be considered a significant impact.</p> <p>However, as part of the Proposed Project, the Project applicant would implement measures to minimize potential impacts to migratory birds and raptors. If grading occurs during the breeding season for migratory birds and raptors (February 15 – August 31), a biologist would survey the Project site and adjacent areas for nests (in trees, shrubs, and on the ground). If the biologist finds an active nest, construction workers would not directly or indirectly disturb the nest or adjacent areas (within 150 feet) until the biologist determines that the nest is no longer in use. In addition, following the completion of construction, the Project applicant would ensure construction contractors immediately stabilize all disturbed soils and re-plant with grass and shrub species consistent with pre-existing vegetation and in compliance with EO 13112, Invasive Species. Implementation of these components of the Proposed Project would ensure that impact remain less than significant.</p>				

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010000

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Mitigation Measures: No mitigation is required.</p>				
<p>b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</p>	□	□	□	■
<p>Significance: No Impact The Project site does not support any sensitive natural communities. Therefore, no impact would occur. Mitigation Measures: No mitigation is required.</p>				
<p>c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p>	□	□	□	■
<p>Significance: No Impact Regulatory Background Information Under Section 404 of the U.S. Clean Water Act (CWA), the U.S. Army Corps of Engineers (Corps) has authority to regulate activities that involve discharges of fill or dredged material or otherwise modify wetlands or other waters of the United States. The Corps makes jurisdictional determinations of the extent of waters of the United States under the CWA section 404, and implements the federal policy embodied in Executive Order 11990, which is intended to preserve wetland function and values. In achieving the goals of the CWA, the Corps seeks to avoid adverse impacts and to offset unavoidable adverse impacts on existing aquatic resources. Any fill or modification of waters of the United States, including jurisdictional wetlands, could require a permit from the Corps prior to the start of work. Projects that have relatively</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>small impacts (generally less than 0.5 acres) on waters of the United States can often be permitted under the Corps Nationwide Permit (NWP) program. CWA section 401 requires a Section 404 permit applicant to also obtain certification from the appropriate State agency that the Section 404 permit is consistent with the State's water quality standards. In California, the State Water Resources Control Board (State Water Board) and nine (9) Regional Water Quality Control Boards (Regional Water Boards) have authority over waters of the United States through section 401 of the CWA. In addition, the Regional Water Boards have authority pursuant to the California Water Code (CWC) to regulate discharges to wetlands and waters of the State which means "any surface water or ground water, including saline waters, within the boundaries of the state," as defined in CWC section 13050(e).</p> <p>Results of Natural Resources Survey</p> <p>Under contract with the Department of the Navy, a site reconnaissance level natural resources survey was conducted on September 22, 2009 for the Commissary project in the project area. A certified wetlands biologist (Wetland Delineator Program Certification - qualifies individuals to perform wetland delineations in accordance with the U.S. Army Corps of Engineers and Section 307(e) of the Water Resources Development Act of 1990) conducted a wetland determination for the project area. The wetlands biologist applied the three-parameter approach as stipulated by the Regional Supplement to the Corps Wetland Delineation Manual: Arid West Region (Version 2.0) (USACE 2008). In order to properly apply the three-parameter approach, the wetlands biologist completed the Corps' Arid West Wetland Datasheet Pit 1A-2009. Appendix B of this IS-ND presents the results of the September 2009 survey. As determined, the project area met the parameter for hydrology; however, it did not meet the parameters for wetland vegetation and hydric soils. Therefore, the project area was determined not to be a wetland or to support wetland habitats.</p> <p>As documented in the wetland determination, the project area does not contain and is not within an ephemeral stream, wash, watercourse with subsurface flow, or a floodplain of a body of water, and does not constitute aquatic habitat or waters of the United States. Thus, no impacts to jurisdictional resources would occur and the project is not subject to the requirements of the California Department of Fish and Game (section 1600-1616 of the Fish and Game Code [Lake or Streambed Alteration Agreement]) or to federal CWA jurisdiction by the Corps (section 404 of the CWA) or Regional Water Boards (section 401 of the CWA). No impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>The Proposed Project is located within an open space area surrounded by low-density residential to the south and west, US 395 and agricultural uses to the east, and open space to the north. The Project site can be used as a wildlife movement corridor because natural wildlife barriers do not exist. Localized species can continue to use the Project site during construction activities. However, construction activities would temporarily affect wildlife species movement in the area but mobile species would continue to be able to use the surrounding area as movement corridors. Therefore, there would be less than significant impact on such resources resulting from implementation of the Proposed Project.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>There are no local biological resources protection policies or ordinances that would apply to the Proposed Project. No impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

040103

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Significance: No Impact</p> <p>There are no approved Habitat Conservation Plans, Natural Conservation Community Plans, or other adopted plans in the vicinity of the Project site that would conflict with the goals and objectives of the Proposed Project. Therefore, no impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>V. CULTURAL RESOURCES</p> <p>Would the project:</p>				
<p>a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?</p>	□	□	□	■
<p>Significance: No Impact</p> <p>The Proposed Project would not result in the removal or substantial alteration of any existing structures located within the CMFHA. As a result, the Proposed Project would not affect any potential historic structures or resources. No impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?</p>	□	□	■	□
<p>Significance: Less than Significant Impact</p> <p>Construction of the Proposed Project would require site grading and preparation as well as trenching activities. Although the Project site is located on previously disturbed land, it is possible, though unlikely, that earth-disturbing construction activities could encounter and damage previously unknown subsurface prehistoric or historic-period archaeological resources, human remains, or paleontological resources. A recent survey conducted for the Proposed Project and surrounding area</p>				

040104

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>identified CA-MNO-4546, a small ethnohistoric site located adjacent to the limits of construction of the proposed USMC commissary, which indicates the potential for previously undiscovered archaeological resources in the region. To prevent potential impacts to CA-MNO-4546, the identified site would be fenced, as part of the Proposed Project, under the supervision of an archaeologist, and an archaeological monitor would be present during construction activities associated with the proposed USMC commissary to ensure that potential archaeological resources in the immediate vicinity are preserved. In addition, to ensure that any previously unknown resources in other areas of the Project site that may be discovered during earthmoving activities are properly addressed, all Project-related earthmoving activities would cease in the event of a discovery until an archaeologist could provide input regarding the significance of the resource. These measures, which were identified in the EA conducted for the Proposed Project, have been incorporated as part of the Proposed Project and would ensure that impacts remain less than significant.</p> <p>Mitigation Measures: No mitigation is required.</p>				
<p>c. Directly or indirectly destroy a unique paleontological resource or unique geologic feature?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p>				
<p>The aforementioned Phase I Archaeological Site Investigation determined the Project site is not underlain by any geologic formations that would typically contain fossils. As such, the potential for paleontological resources at the Project site are considered low, and impacts would be considered less than significant. It should be noted that, in the event of an accidental discovery (as noted in Item V.b. above) all Project-related earthmoving activities would cease until a qualified professional could provide input regarding the significance of the resource. As noted above, this measure has been incorporated into the Proposed Project. Impacts would be less than significant.</p> <p>Mitigation Measures: No mitigation is required.</p>				
<p>d. Disturb any human remains, including those interred outside of formal cemeteries.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

040105

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Significance: No Impact</p> <p>No human remains, including those interred outside of formal cemeteries are known to exist within CMFHA, which includes the Project site. It should be noted that, in the event of an accidental discovery (as noted in Item V.b. above) all Project-related earthmoving activities would cease until a qualified professional could provide input regarding the significance of the resource. As noted above, this measure has been incorporated into the Proposed Project. Impacts would be less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>VI. GEOLOGY AND SOILS</p> <p>Would the project:</p>				
<p>a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</p>				
<p>i. Rupture of a known earthquake fault, as delineated on the most recent Alquist - Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.</p> <p>ii. Strong seismic ground shaking?</p> <p>iii. Seismic-related ground failure, including liquefaction?</p> <p>iv. Landslides?</p>				
<p>Significance: Less than Significant Impact</p>				

040106

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>The CMFHA and Project site are located within a major fault system known as the Eastern California Shear Zone and in the Antelope Valley fault zone, which is a seismically active region. The Antelope Valley Fault is the nearest fault to the Project site, located approximately 0.5 miles west of the CMFHA. Under the Alquist-Priolo Special Studies Zone Act of 1972, the construction of structures within 50 feet of an active fault is prohibited, and based on the distance between the nearest active fault and the Project site, the Proposed Project would be consistent with this restriction, which is intended to prevent hazards associated with fault rupture. No faults are known to transverse the Project site. Ground liquefaction and landslides are not considered a potential seismic hazard at the Proposed Project site as it lies on a relatively flat portion of an alluvial fan with a slight west to east-southeast downward slope. The Proposed Project would be designed in accordance with standard geotechnical elements to account for site-specific conditions, including seismic considerations prior to construction. As a result, impacts would be considered less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>b. Result in substantial soil erosion, or the loss of topsoil?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>The predominant soil at the Project site is Holbrook cobbly loamy sand, which is a deep, well-drained soil with very low to medium surface runoff. Proposed construction activities would require excavation, grading, fill, and drilling and would conform to the measures recommended in the Project's site-specific erosion control plan (ECP). Implementing the use of sandbags, silt fencing, earthen berms, and temporary sedimentation basins are examples of measures identified in the ECP that would ensure that erosion and loss of topsoil would be minimized during construction. Following construction, no impacts to topography or soils are anticipated as the proposed storm water runoff design features at the Project site prevent any potential erosion above typical background levels for the site associated with construction and storm water drainage. As a result of potential construction activities, Project-related impacts pertaining to loss of topsoil and erosion would be considered less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

010007

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>The Project area consists of deposits that are generally permeable with underlying weathered and fractured granitic and metamorphic bedrock material. Holbrook cobbly loamy sand soils in the Project area are often moist in the winter and spring and dry in the summer and fall. Per the U.S. Department of Agriculture, shrink-swell soils do not occur at the Project site. As noted above under Item VI.a., the Project site is located on largely flat areas within the CMFHA, and based on the aforementioned soil conditions, the Proposed Project would not be located on a geologic unit or unstable soil resulting in lateral spreading, subsidence, liquefaction or collapsing. Impacts would be less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>d. Be located on expansive soils, as defined in Table 18-1-13 of the Uniform Building Code (1994), creating substantial risks to life or property?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>As noted above under Item VI.c., the Proposed Project is not located on soils that experience shrink-swell conditions, and as a result, substantial risks to life or property are not anticipated as a result of expansive soil conditions. No impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

040108

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant</p> <p>Soils at the CMFHA, which includes the Project site, have adequately supported the use of community-scale septic tanks for the past 30 years. The Proposed Project would involve an improvement to the existing wastewater treatment processes at the CMFHA by installing a tertiary on-site wastewater treatment plant and associated facilities to decrease the reliance on soil for wastewater treatment. The Proposed Project would ensure that the treatment capacity of the wastewater facilities at the CMFHA are adequate for existing and planned future conditions. Further, the design of the Proposed Project would conform to applicable building code requirements with respect to soil compaction and other geologic hazards. As a result, impacts would be considered less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>VII. GREENHOUSE GAS EMISSIONS</p> <p>Would the project:</p>				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gasses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p>				

040109

040109

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>The information provided in this section is based on recently established California goals for reducing GHG emissions, as well as a project-specific emissions inventory developed for the Proposed Project. GBUAPCD has not adopted CEQA thresholds of significance for GHG emissions at this time. For CEQA purposes, there is still debate on the means of determining whether or not an individual project's greenhouse gas emissions contribute to a significant cumulative impact on the global climate.</p> <p>An individual project, such as the Proposed Project, does not generate sufficient GHG emissions to directly influence global climate change; therefore, the issue of global climate change typically involves an analysis of whether a project's contribution towards a cumulative impact is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. The following is a good faith effort at disclosing the nature of the Project's potential effect with regard to GHG emissions, and suggest measures, as appropriate, to reduce potential GHG emissions.</p> <p>This analysis is based on the methodologies recommended by the California Air Pollution Control Officers Association [CAPCOA] (January 2008) CEQA and Climate Change white paper. CAPCOA conducted an analysis of various approaches and significance thresholds, ranging from a zero threshold to a high of 40,000–50,000 metric tons of carbon dioxide equivalent (CO₂e) per year. A strict zero threshold, in which any GHG emissions above zero would contribute to a cumulatively considerable impact, is inconsistent with CEQA court decisions which reject a "one more molecule rule" for cumulative impact analysis. CAPCOA also analyzed non-zero thresholds; for example, assuming a threshold based on the AB 32 2020 targets would require all projects to achieve a 33 percent reduction from projected "business-as-usual" emissions to be considered less than significant. Another method based on a market capture approach that requires mitigation for greater than 90 percent of likely future discretionary development would use a quantitative threshold of greater than 900 metric tons CO₂e/year for most projects. Another potential threshold of 10,000 metric tons was considered by the Market Advisory Committee for inclusion in a GHG Cap and Trade System in California. A 10,000-metric-ton significance threshold would correspond to the GHG emissions of approximately 550 residential units, 400,000 square feet of office space, 120,000 square feet of retail, or 70,000 square feet of supermarket space. This threshold would capture roughly half of new residential or commercial development. The basic concepts for the various approaches suggested by CAPCOA are used herein to determine whether or not the Proposed Project's GHG emissions are "cumulatively considerable."</p>				

040110

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact														
<p>Calculations of carbon dioxide, methane, and nitrous oxide are provided for full disclosure of the magnitude of potential Project effects. The analysis focuses on carbon dioxide (CO₂), nitrous oxide (N₂O), and methane (CH₄) as these are those GHG gases that the Proposed Project would emit in the largest quantities, as compared to other GHGs (such as chlorofluorocarbons [CFCs]).</p> <p>Construction-related GHG emissions of CO₂, nitrous oxide, and methane were quantified using CARB's OFFROAD2007 model, consistent with the modeling performed for Air Quality (see Item III.b. above). Construction of the Proposed Project would be expected to generate 485 metric tons of CO₂e emissions during the eight-month construction period. Within this calculation are approximately 390.1 metric tons of CO₂ emissions, 0.04 metric tons of methane emissions, and 0.30 metric tons of nitrogen dioxide emissions. It should be noted that methane and nitrogen dioxide emissions were corrected to reflect their global warming potential when converted to CO₂e.</p> <p>During operation of the Proposed Project, GHG emissions would be 751 metric tons of CO₂e emissions per year. Within this calculation, 596 metric tons are attributable to mobile source emissions and 155 metric tons to area source emissions, which includes electricity use, natural gas use, and landscaping-related emissions. The majority of operational GHG emissions associated with the Proposed Project would be attributed to the additional vehicle traffic to and from the proposed USMC commissary. As discussed above, CAPCOA provided several approaches to consider potential cumulative significance of projects with respect to GHGs. Table 3 shows CAPCOA's suggested thresholds for GHG emissions.</p>																		
<p>TABLE 3 CAPCOA SUGGESTED THRESHOLDS FOR GREENHOUSE GASES</p> <table border="1"> <thead> <tr> <th data-bbox="235 1372 901 1404">Type of Threshold</th> <th data-bbox="901 1372 1364 1404">Threshold</th> </tr> </thead> <tbody> <tr> <td data-bbox="235 1404 901 1447">Quantitative (900 tons)</td> <td data-bbox="901 1404 1364 1447">~ 900 tons CO₂e/year</td> </tr> <tr> <td data-bbox="235 1447 901 1553">Quantitative CARB Reporting Threshold/Cap and Trade</td> <td data-bbox="901 1447 1364 1553">Report: 25,000 tons CO₂e/year Cap and Trade: 10,000 tons CO₂e/year</td> </tr> <tr> <td data-bbox="235 1553 901 1596">Quantitative Regulative Inventory Capture</td> <td data-bbox="901 1553 1364 1596">~40,000 – 50,000 tons CO₂e/year</td> </tr> <tr> <td data-bbox="235 1596 901 1638">Qualitative Unit-Based Threshold</td> <td data-bbox="901 1596 1364 1638">Commercial Space > 50,000 sf</td> </tr> <tr> <td data-bbox="235 1638 901 1702">Statewide, Regional or Area-wide (CEQA Guidelines 15206(b))</td> <td data-bbox="901 1638 1364 1702">Office Space >250,000 sf</td> </tr> <tr> <td colspan="2" data-bbox="235 1702 1364 1798"> <p>Note: sf = square feet Source: California Air Pollution Control Officers Association, <i>CEQA & Climate Change</i>, January 2008.</p> </td> </tr> </tbody> </table>					Type of Threshold	Threshold	Quantitative (900 tons)	~ 900 tons CO ₂ e/year	Quantitative CARB Reporting Threshold/Cap and Trade	Report: 25,000 tons CO ₂ e/year Cap and Trade: 10,000 tons CO ₂ e/year	Quantitative Regulative Inventory Capture	~40,000 – 50,000 tons CO ₂ e/year	Qualitative Unit-Based Threshold	Commercial Space > 50,000 sf	Statewide, Regional or Area-wide (CEQA Guidelines 15206(b))	Office Space >250,000 sf	<p>Note: sf = square feet Source: California Air Pollution Control Officers Association, <i>CEQA & Climate Change</i>, January 2008.</p>	
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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Based on CAPCOA suggested thresholds in Table 3, the Proposed Project's annual contribution of 751 metric tons of CO₂e would not exceed the 900-ton Quantitative Threshold, nor any of the other four thresholds. Therefore, the Proposed Project's contribution to GHG emissions and climate change would not be considered cumulatively considerable, and impacts would be less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>VII. HAZARDS AND HAZARDOUS MATERIALS.</p> <p>Would the project:</p>				
<p>a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>In 2003, an Environmental Baseline Survey (EBS) was conducted for the CMFHA, which includes the Project site, and concluded that the CMFHA had no releases or disposals of hazardous substances or petroleum products. Under the Proposed Project, the operations associated with the CMFHA would not change. No new residences or land uses would be constructed and wastewater flows would be treated on-site. Similar to existing conditions, any shipments of hazardous materials to the Project site would follow U.S. Department of Transportation requirements for hazardous materials packaging, labeling, and transport. As a result, a less than significant impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

040112

040112

040112

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Significance: Less than Significant Impact</p> <p>As mentioned previously, an EBS conducted for the CMFHA determined that the CMFHA was a Category 1 site (RBF 2003). This classification indicates the site has no releases or disposals of hazardous substances or petroleum products. In 2010 a study was conducted to investigate the potential for any listed hazardous/toxic sites within or adjacent to the CMFHA. Furthermore, no upset or accidental release sites were identified within one-quarter mile of the CMFHA.</p> <p>Construction of the new effluent disposal system may involve excavation or grading of soils contaminated by sewage and related pathogenic organisms, or may result in encounters with perched or unpercolated effluent from excavation of the existing leach field system. These soils and waters may contain high amounts of bacteria and viruses that could sicken exposed workers unless appropriate precautions are taken. The construction plans and specifications package for the Proposed Project includes a Health and Safety plan. The Health and Safety Plan identifies a number of key elements to ensure worker safety. Some of these include but are not limited to safety-oriented signs and posters, project-specific safety training, weekly or as needed pre-construction meetings, wash and shower facilities, exclusion fencing of unsafe conditions or hazards, etc.</p> <p>During construction, all inactive but exposed areas of the existing leach field system would be covered and construction workers would be required by the construction contractor to wash in designated on-site wash facilities after having worked within the areas of the existing leach field system until all active disturbances have been completed.</p> <p>Minor amounts of existing effluent encountered during construction would be allowed to percolate/attenuate on-site. In the event, workers encounter a large volume of effluent or other sewage during construction, a California-licensed sewage contractor would remove the effluent for onsite disposal at the treatment plant or for off-site disposal in accordance with all applicable regulations. Therefore, impacts of hazards to the public, workers or the environment through reasonably foreseeable upset and accident conditions involving the ground disturbances or release of hazardous materials into the environment as a result of the Proposed Project are less than significant.</p> <p>Mitigation Measures:</p> <p>No Mitigation Required.</p>				

040113

040113

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>While the Proposed Project includes the operation of a new CDC, the existing CDC operating at the CMFHA would remain operational until such time as the new CDC is occupied. As such, the Project site is considered to be located within one-quarter mile of a school. However, as the Proposed Project would involve improvements to existing on-site water and wastewater treatment operations and construction of the USMC commissary on adjacent federally-owned land, which would not involve potentially hazardous emissions during their operation, no new hazardous emissions or hazardous materials, substances, or waste would occur as a result of implementation of the Proposed Project. Therefore impacts are less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>Neither the Project site nor the CMFHA are listed on the state's list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; therefore, no impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

040114

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>The Proposed Project is not located within an airport land use plan or, where such a plan has been adopted, within two miles of a public airport or public use airport. The nearest airport is the Bryant Field Airport, located approximately 35 miles from the Project site, therefore no impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>The Proposed Project area is not located within the vicinity of a private airstrip and would not result in a safety hazard for people residing or working in the Project area; therefore no impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>The Mono County Multi-Hazard Functional Plan, which includes the Mono County Caldera Initial Response Plan, sets forth site-specific evacuation plans as well as general evacuation procedures for various emergency situations. The Proposed</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Project would involve the construction of facilities within a playfield and other previously undeveloped portions of the CMFHA. No public access roads would be removed with Project implementation, and the new public access road associated with the proposed USMC commissary would be designed in accordance with standard building practices to allow for the passage of emergency vehicles. As such, the Proposed Project would not impair or physically interfere with an adopted emergency response or emergency evacuation plan. No impact would occur.</p> <p>Mitigation Measures: No mitigation is required.</p>				
<p>h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>The structures associated with the Proposed Project would be located entirely within the boundaries of the CMFHA and contain appropriate fire control/prevention measures as dictated by use type. The new facilities would be maintained periodically to ensure adequate clearance of flammable vegetation so as not expose people or structures to any new risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.</p> <p>Mitigation Measures: No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>IX. HYDROLOGY AND WATER QUALITY Would the project:</p>				
<p>a. Violate any water quality standards or waste discharge requirements?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

040116

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Significance: Less than Significant Impact</p> <p><u>Construction</u></p> <p>In conducting the drainage modifications during construction activities, the existing conveyance and basin capacity would be maintained at all times. Because the project area would disturb more than one acre of land, the applicant would be required to apply for and comply with the State Water Board's National Pollutant Discharge Elimination System (NPDES) Permit for Discharges of Storm Water Runoff Associated with Construction Activity (Construction General Permit) (Order No. 2009-0009-DWQ, NPDES No. CAS000002), adopted September 2, 2009. Under this order the applicant is required to submit a Notice of Intent for coverage and prepare a Storm Water Pollution Prevention Plan (SWPPP) and an Erosion Control Plan (ECP). The SWPPP has two major objectives: (1) to help identify the sources of sediment and other construction-related pollutants that affect the quality of storm water discharges; and (2) to describe and ensure the implementation of Best Management Practices (BMPs) to reduce or eliminate sediment and other pollutants associated with construction activity in storm water, as well as in non-storm water discharges. BMPs are intended to reduce impacts and to minimize or prevent pollutants in storm water discharges and authorized non-storm water discharges through the use of controls, structures, and management practices that utilize best available technology economically achievable (BAT) for toxic pollutants and non-conventional pollutants and best conventional pollutant control technology (BCT) for conventional pollutants such as sediment. These standards were created by Congress to allow regulators the flexibility necessary to tailor programs to the site-specific nature of storm water discharges. BMPs that emphasize pollution prevention and source control will be applied on the project site, with additional structural controls as needed. SWPPP BMPs are recognized as effective methods to prevent or minimize the potential releases of pollutants into drainages, surface waters, or ground water.</p> <p>Proposed construction activities would have the potential to temporarily increase storm water runoff rates and discharges of construction-related pollutants in storm water, and could increase local erosion rates. However, as stated previously, the construction contractor would implement the ECP and a SWPPP to minimize potential water quality impacts resulting from construction activities. The BMPs that the contractor must use to minimize site discharges of sediment in storm water from erosion during construction, as well as minimize other pollutants in storm water runoff. Potential standard runoff and erosion control measures could include installing wood fiber mulch, silt fencing, and temporary sedimentation basins.</p>				

040117

040117

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>In accordance with Order No. 2009-0009-DWQ, NPDES No. CAS000002, post-construction storm water quality controls must also be implemented and maintained to prevent adverse changes to site hydrology and reduce pollutants in storm water runoff. These include stabilization of disturbed areas through revegetation or other protection; measures to ensure that the pre-project volume of rainfall that ends up as runoff for the smallest storms up to the 85th percentile storm event (or the smallest storm event that generates runoff, whichever is larger) is maintained; and implementation of BMPs to reduce pollutants in storm water discharges that are reasonably foreseeable after all construction has been completed.</p> <p>Pursuant to the Energy Independence and Security Act of 2007 (EISA) – EISA established strict storm water runoff requirements for federal development and redevelopment projects. This provision requires that, for federal development projects, the sponsor of any development or redevelopment project involving a Federal facility with a footprint that exceeds 5,000 square feet shall use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow.</p> <p>Implementation of the SWPPP and ECP would ensure that discharges of disturbed soils to downstream watercourses would not occur. Modifications to the drainage basin would be undertaken during dry periods when water is not pooling in the retention basin and storm water runoff potential from precipitation events is low, not expected nor predicted by the National Weather Service. In adherence to the aforementioned provisions in the EISA coupled with implementation of the project-specific SWPPP and ECP to prevent erosion of disturbed soil, the proposed construction activities and drainage modifications would result in less than significant impacts to water quality.</p> <p><u>Operation</u></p> <p>The proposed wastewater treatment facilities would provide on-site tertiary treatment and reduce total nitrogen compounds in discharged effluent to about five times less than existing conditions (Apex 2010). Therefore, even though the amount of effluent may increase (50,000 gpd compared to 39,000 gpd), there would still be a net reduction (of about 3.5 times less) in total nitrogen discharged. Treated effluent would be discharged to underground leach fields within two areas located to the east and west of the proposed wastewater treatment plant. The nondisinfected tertiary effluent represents an improvement in the quality of the wastewater treatment compared to existing conditions. Fecal coliform bacteria generated at the Project site and biochemical oxygen demand associated with wastewater treatment would be</p>				

040118

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>reduced by an additional 40 percent compared to existing conditions. As such, there would be a net reduction in fecal coliform bacteria and biochemical oxygen demand discharged to the leach fields by about 20 percent (20 percent more wastewater capacity, but 40 percent reduction in effluent concentrations). The improved treatment system is expected to improve the water quality of effluent to maintain compliance with waste discharge requirements and standards that will be established for the discharge by the Water Board.</p> <p>In addition to tertiary treatment, vegetation will be planted over the underground effluent disposal system to consume water and nutrients, which would further reduce nitrate concentrations percolating to the underlying ground water. Furthermore, below-grade slopes will be lined with a new perimeter liner to segregate the treated effluent from the storm water retention basin. Specifically, on the downhill side of the leach field, closest to the storm water retention basin the perimeter liner will be up to five (5) feet deep. As designed this perimeter liner will prevent treated effluent interaction with storm water runoff during periods of seasonal high flow discharges to the storm water retention basin. As such, the Proposed Project is expected to reduce the potential for violations of water quality standards for nitrate concentrations in the Project area.</p> <p>Implementation of the Proposed Project would result in less than significant impacts on ground water quality.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>b. Substantially deplete ground water supplies or interfere substantially with ground water recharge such that there would be a net deficit in aquifer volume or a lowering of the local ground water table level (i.e., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?</p>	□	□	■	□
<p>Significance: Less Than Significant Impact</p>				

040119

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>The USMC commissary would require additional water supplies, which would be provided via existing ground water well(s) located within the CMFHA. The four residences that are currently used as the CMFHA's existing CDC would be reused as residential units. Although, this is a change in type of use, it is not expected to generate new potable water demand above existing demand because daily water demands at the CDC generated by care providers, parents and children for up to eight hours per day is expected to generate more demand than a single-family residence that may or may not be occupied for up to eight hours per day. As such, only the USMC commissary at the CMFHA would generate a net gain in water demand. Existing maximum daily demand at the CMFHA is approximately 105,120 gallons. The Proposed Project would increase the potential maximum demand for ground water supplies by approximately 1,624 gpd, which equates to a 1.5 percent increase in maximum demand at the CMFHA.</p> <p>The ground water basin is composed of a series of interbedded alluvial fans, floodplain and stream channel deposits, and lake sediments. The primary water-bearing formations are recent valley sediments. Some localized ground water occurs within fractures and joints of volcanic, granitic or metamorphic rocks. Ground water in Antelope Valley occurs in unconfined and artesian zones. Depths to ground water in the upper zone varies from 160 feet in the southeastern portion of Antelope Valley to less than 2 feet in many places in the center of the valley. Walker River Investigation estimates ground water storage in the Antelope Valley Basin to be 170,000 acre-feet (AF). The ground water storage capacity was based on a storage interval between 10 and 100 feet and a specific yield of 5 percent and 15 percent. (Department of Water Resources, Bulletin 118: Ground water Basin Number 6-7 Updated February 2004). Mono County in 2001 estimated the capacity of ground water supplies of the Antelope Valley Basin at up to 52,136 million gallons. (Mono County 2001)</p> <p>As of 2004, no ground water budget data exists to compare, inflows, including natural, applied, and artificial recharge to outflows including urban and agricultural extraction; therefore an accurate estimate regarding the effect of additional ground water extractions are not possible at this time. Recharge from precipitation (average annual of 11 inches per year) falls during the winter months, and typically the amounts increase with altitude. Some precipitation falls as rain, but winter snow generally accumulates in large amounts in the higher mountain areas. On the Nevada side of Antelope basin recharge is estimated at up to 5,000 acre-feet per year (afy) with another 1,600 afy contributed by Topaz Lake (Nevada Division of Water Resources 2006), which is directly up gradient from the CMFHA.</p> <p>As stated above, ground water in storage is estimated at 170,000 AF and recharge (natural, applied and infiltrated) appears to exceed extractions (in the Nevada portion</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>of the Antelope Valley basin recharge exceeded extractions by 5,460 afy). Total demand including the Proposed Project's demand for ground water at the CMFHA is estimated at 106,744 gpd (39 million gallons per year) or 120 afy.</p> <p>As such, the potential incremental increase in potable water demand (0.6 million gallons per year) at the CMFHA is considered minimal with respect to existing available ground water supplies (170,000 AF or 52,136 million gallons) in the Antelope Valley Basin area.</p> <p>The Proposed Project would not substantially increase the level of impermeable surfaces at the CMFHA such that ground water recharge would be affected. The on-site storm water infiltration basin would be resized to cover a smaller area but maintain the existing 237,000 ft³ storm water retention capacity. The overall capacity of the storm water infiltration basin would remain the same as the existing system; therefore, the retention basin would still be sufficient to capture and infiltrate all runoff from the 100-year, 24-hour storm event. Furthermore, additional treated wastewater effluent would be discharged to leach fields and percolate to (recharge) the ground water system.</p> <p>In compliance with EISA Section 438, all runoff above pre-development levels (including existing development) would have to be detained, on-site, to the maximum extent feasible. The intention of the statute is to maintain or restore the pre-development site hydrology during the development or redevelopment process. Therefore, the Proposed Project would not affect the amount of storm water from the CMFHA being allowed to percolate on-site back into the ground water table.</p> <p>Based on ground water monitoring well data from the past five years, the current wastewater effluent leach field disposal method has increased nitrate concentrations in the ground water beneath the leach field (NAVFAC SW 2010). Nitrate increases are localized and generally below levels that would adversely affect the water for beneficial uses (10 milligrams per liter as N). By upgrading the wastewater treatment to a tertiary level, the quality of the ground water is expected to improve with regard to existing nitrate levels, and thereby protect the ground water for domestic and municipal beneficial uses. Because the Proposed Project would not substantially affect the level of ground water supplies in the Project area nor would it negatively affect ground water quality, implementation of the Project would have a less than significant impact on ground water levels and supplies.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

040111

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>Storm water run-off (overland or sheet flow) from the areas to the northwest and southwest of the project area and the storm water drainage from the [project] area are captured and temporarily detained in a man-made storm water retention basin on the project site. Off-site runoff to the storm water basin is estimated at 250,000 cubic feet or more from a 100-year, 24-hour storm. Onsite runoff from the CMFHA to the basin during this storm is estimated at 115,328 cubic feet (Apex, Sept. 30, 2010). Currently, the basin is designed to overflow by way of a 6-inch-diameter standpipe or emergency overflow spillway and drains under U.S. Highway 395 through a 24-inch diameter culvert. Storm water continues to flow via Alkali Ditch toward the West Walker River.</p> <p>Modifications to the storm drainage system include reconfiguring a portion of the existing basin and reducing the basin surface area but would also deepen the remaining portions of the basin to retain the existing volume of 237,000 cubic feet. The existing concrete delivery channels would be modified and slightly extended as needed to deliver water to the retention basin, and the outlets would be refurbished in kind.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>The Proposed Project would not substantially alter on-site drainage patterns. Although the existing storm water retention basin will be reconfigured, and all swales and other drainage that currently flows to the storm water retention basin will continue to be routed to the storm water retention basin. No modifications to off-site runoff draining to the Project site are proposed; flows from upland areas will continue to drain through concrete culverts to the Project site and retention basin, similar to existing conditions.</p> <p>To prevent and control erosion and flooding, all drainage modifications would be timed to occur during periods of the year when flows are not anticipated due to storms, or are otherwise minimal, and would use bypass and other measures such as sand bag dikes, cofferdams, and siltation fencing, as needed, to control waste discharges and divert flows around active areas during construction. The proposed reconfiguration of the retention basin would not reduce the capacity of 237,000 ft³ (deepened by five feet to maintain capacity) nor the ability of the storm water infrastructure at the CMFHA to manage storm water from up to the 100-year, 24-hour storm event. In general, the Proposed Project would not substantially alter existing drainage patterns of the CMFHA. The majority of storm water flows would continue to be routed to the northeastern portion of the CMFHA and retained on-site, similar to existing conditions. Additionally, as noted above, in compliance with EISA Section 438, all runoff above pre-development levels (including existing development) would be detained, on-site, to the maximum extent feasible. Excess runoff would continue to be discharged from the retention basin under I-395 through an existing 24-inch culvert. As such, no long-term impacts would occur to the hydrologic regime associated with the retention basin. Therefore, the proposed drainage modifications would result in less than significant impacts.</p> <p>Potential Proposed Project effects on polluted runoff are addressed in IX(b) above.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>f. Otherwise substantially degrade water quality?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>Water quality degradation beyond what was discussed in Item VIII.a. and VIII.b. above are not anticipated as a result of Proposed Project activities. No additional impact would occur.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Mitigation Measures: No mitigation is required.</p>				
<p>g. Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact No housing would be developed as part of the Proposed Project. No impact would occur. Mitigation Measures: No mitigation is required.</p>				
<p>h. Place within a 100-year floodplain structures which would impede or redirect flood flows?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact The Project is not located within a FEMA-designated 100-year floodplain. Furthermore, per Mono County, the Project site is not located within a 100-year floodplain (Mono County 2001). No impact would occur. Mitigation Measures: No mitigation is required.</p>				
<p>i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact Construction of the Proposed Project would not expose people or structures to risk of loss, or injury or death involving flooding due to the failure of a levee or dam. Neither a levee nor dam exists within the Project vicinity. Furthermore, the Project site would not be subject to flooding from a levee or dam failure per Mono County (Mono County</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>2001). As such, the Proposed Project would not increase flood risks associated with levee or dam failure, culvert capacity constraints, or reduction in on-site retention. No impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>j. Inundation by seiche, tsunami, or mudflow?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>The Project site is not located in an area near and down gradient of any enclosed or semi-enclosed bodies of water subject to seiche effects. The Project site is located on the eastern side of the Sierra Nevada and not subject to tsunami risks. The Project site is not located near any steep, unstable hillsides subject to high rainfall rates that could result in mudflows (see section VI. Geology and Soils). No impacts would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>X. LAND USE AND PLANNING</p>				
<p>Would the project:</p>				
<p>a. Physically divide an established community?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>The Proposed Project would be located on previously maintained open space associated with the CMFHA. Residences are located in the western and southern portions of the CMFHA, with open space to the north and US 395 to the east. Construction of the Proposed Project would not divide existing portions of the community as it is proposed to be built upon land outside of existing residential areas and would not involve the removal of any existing residential structures. No impact would occur.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Mitigation Measures: No mitigation is required.</p>				
<p>b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating on environmental effect?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>The Proposed Project would be constructed on federally-owned land designated "Resource Management/Government Land" (Mono County 2010) and would be implemented in accordance with all applicable land use regulations, in addition to remaining consistent with existing land use. No impacts to any local land use plans, policy, or regulation of an agency with jurisdiction over the Proposed Project would occur.</p> <p>Mitigation Measures: No mitigation is required.</p>				
<p>c. Conflict with any applicable habitat conservation plan or natural community conservation plan?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>Implementation of the Proposed Project would not conflict with any applicable habitat conservation plans or natural community conservations plan because there are no conservation areas located in the Project vicinity (see Item IV.f. above). No impact would occur.</p> <p>Mitigation Measures: No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XI. MINERAL RESOURCES				
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>The CMFHA, which includes the Project site, is not designated as a mineral deposit or resource area, and no known resources exist within the Project vicinity in a large enough quantity to be of value to the region and the residents of the state (Mono County 2001). No impact would occur.</p> <p>Mitigation Measures: No mitigation is required.</p>				
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>Construction of the Proposed Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local land use plan. The Project site, as noted above, is located on largely undeveloped land/open space at the CMFHA, which is not designated as a mineral deposit or resource area. No impact would occur.</p> <p>Mitigation Measures: No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XII. NOISE				
Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Significance: Less than Significant Impact				
<p>Noise is typically defined as unwanted sound. Typically, noise in any environment consists of a base of steady "background" noise made up of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These sources can vary from an occasional aircraft or train passing by to virtually continuous noise from traffic on a major highway.</p>				
<p>Sound can be described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the intensity of the pressure vibrations that make up a sound. The pitch of the sound is correlated to the frequency of the sound's pressure vibration. Because humans are not equally sensitive to a given sound level at all frequencies, a special scale has been devised that specifically relates noise to human sensitivity. The A-weighted decibel scale (dBA) does this by placing more importance on frequencies that are more noticeable to the human ear.</p>				
<p>Several rating scales have been developed to analyze the adverse effect of noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the volume of the noise, as well as the time of day when the noise occurs. Although the A-weighted sound level may adequately indicate the level of environmental noise at any instant in time, community noise levels vary continuously. Most environmental noise includes a conglomeration of noise from distant sources that creates a relatively steady background noise in which no particular source is identifiable. A single descriptor called the Leq (equivalent sound level) is used as the unit of measurement. The Leq is the average acoustic energy content of noise for a stated period of time. Thus, the Leq of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.</p>				

040128

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Environmental noise levels are generally considered low when the Leq is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Examples of settings with low daytime background noise levels are isolated, natural settings that can provide noise levels as low as 20 dBA and quiet, suburban, residential streets that can provide noise levels around 40 dBA. Noise levels above 45 dBA at night can potentially disrupt sleep. People may consider louder environments adverse, but most people living or working in urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA) accept the higher noise levels commonly associated with these land uses.</p> <p>With regard to A-weighted noise levels, the following relationships exist:</p> <ul style="list-style-type: none"> • Under controlled conditions in an acoustics laboratory, a trained health human ear is able to discern changes in sound levels of 1 dBA; • Outside of such controlled conditions, the trained ear can detect changes of 2 dBA in normal environmental noise; • It is widely accepted that the average healthy ear, however, can barely perceive noise level changes of 3 dBA; • A change in a level of 5 dBA is a readily perceptible increase in noise level; and • A 10 dBA change is recognized as twice as loud as the original source. <p>Sound from a point source generally decays at a rate of 6 dBA per doubling of distance from the source. The rule applies to the propagation of sound waves with no ground interaction. For example, a noise source generating 80 dBA at 200 feet would be experienced as 74 dBA at 400 feet.</p> <p><u>Construction</u></p> <p>During construction activities at the Project site, noise would be produced by the operation of heavy construction equipment and various other construction activities and would be audible at nearby land uses, including the residences to the west and south. The closest off-site (but within the CMFHA) sensitive receptors, which are multi-family residences, are located to the west, approximately 100 feet from the limits of the Project-related activities. The proposed USMC CDC, which would also be considered a sensitive receptor, would be operational during construction of the proposed USMC commissary and wastewater facilities and would also be located approximately 100 feet from the limits of construction.</p> <p>Estimates for noise levels generated by construction equipment are based upon available data presented by the EPA and the FTA's Transit Noise and Vibration</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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Impact Assessment, Final Report, May 2006. It should be noted that the formula for determining maximum noise levels for specific construction equipment relies upon a reference distance of 50 feet. As the distance to the construction activities from the closest receptors would be greater than 50 feet, the typical construction noise levels have been adjusted (as shown in Table 4) to reflect a distance of 100 feet. Noise levels as high as 81 dBA could be experienced by the residential uses adjacent to the construction activities. It should be noted that these noise levels would be intermittent. Construction equipment would not be operating continuously at the boundaries of the Project site. The majority of construction activities would be located no less than 200 feet from the nearest receptor. Nonetheless, noise levels at adjacent residential structures and the proposed CDC could reach as high as 81 dBA when heavy construction equipment is operating within 100 feet.

Equipment Type	Typical Sound Level at 50 Feet in dBA L_{eq}	Sound levels at sensitive receptor location ¹
Backhoe	80	78
Concrete Mixer	85	79
Crane, Mobile	83	81
Dozer	80	74
Excavator	85	81
Loader	79	73
Truck	80	74

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, 2006, p. 12-6.

Although construction noise may be audible at adjacent receptors, it would be conducted during the daytime (between the hours of 7 a.m. and 5 p.m. Monday through Friday), which are considered the less noise-sensitive hours of the day by Mono County (Mono County 2008). Furthermore, because construction noise would cease when construction is complete and because the majority of construction activities would occur at a distance of no less than 200 feet, this impact is considered less than significant. It should be noted that construction equipment would be stored and maintained away from the existing sensitive receptors, to the extent feasible, and all equipment shall be equipped with properly operating and maintained muffling devices.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p><u>Operation</u></p> <p>The proposed wastewater treatment plant would be located approximately 400 feet from the nearest receptor. All other potable water and wastewater treatment facilities associated with the Proposed Project would either be located below ground or would not generate operational noise. The proposed wastewater treatment facility would not be expected to exceed 55 dBA at a distance of 50 feet, which would correlate to 37 dBA at the nearest receptor (approximately 400 feet to the west), which is below the Mono County noise standard for single-family residential structures during noise-sensitive hours (40 dBA). As such, the wastewater treatment plant would not result in a substantial increase in noise levels in excess of local standards.</p> <p>Operational noise associated with the proposed USMC commissary and four additional residential units, which would occur as a result of moving the existing CDC from its current location at the CMFHA to the newly constructed CDC, would largely consist of vehicle traffic to and from the Project site. Approximately 500 daily vehicle trips would occur as a result of the proposed USMC facilities. It should be noted that the majority of these trips already occur in the region but would be redirected to the site as a result of the local shopping opportunity that the proposed USMC commissary presents for the 634 active duty personnel, military reservists, military retirees, and military family members living within approximately 25 miles of the CMFHA. However, for the purposes of presenting a conservative analysis, the trips associated with the proposed USMC commissary are addressed as new trips that do not currently occur within the region. Modeling was conducted to calculate the existing and future vehicular noise levels along individual roadway segments in the project vicinity. This task was accomplished using the Federal Highway Administration (FHWA) Highway Noise Prediction Model (FHWA-RD-77-108), which calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. Assuming a design speed of 55 miles per hour along US 395 and that all project-related traffic would proceed either south or north (for the purposes of a conservative analysis), noise levels would be anticipated to increase along US 395 by no more than 0.3 dBA L_{dn}, which is a 24-hour measure of ambient noise levels. Noise levels along US 395 are currently estimated at approximately 66.6 L_{dn} (at a distance of 100 feet) under existing conditions, and assuming the aforementioned worst-case conditions of the proposed USMC facilities, noise levels along US 395 would increase to 66.9 dBA L_{dn}. This would be considered an imperceptible increase in ambient noise levels, as a difference of 3 dBA is generally considered to be barely perceptible increase to most people. Additional localized noise associated with activities at the proposed USMC commissary would be shielded from nearby receptors by the proposed segment wall</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>and would be restricted to the approximate hours of 10:00 a.m. to 6:00 p.m., and as such would not be considered substantial or be expected to result in noise levels above 55 dBA at nearby receptors. As such, operational impacts would be less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

<p>b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?</p>	□	□	■	□
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Significance: Less than Significant Impact

The Proposed Project would result in less-than-significant impacts related to groundborne vibration or groundborne noise levels. Construction activities typically create an increase in groundborne vibrations and noise levels. Table 5 identifies various vibration velocity levels for the types of construction equipment that would be expected to operate at the Proposed Project site during construction.

Construction Equipment	Approximate Peak Particle Velocity (in/sec)				
	10 Feet	25 Feet	50 Feet	100 Feet	150 Feet
Large Bulldozer	0.352	0.089	0.031	0.011	0.006
Loaded Trucks	0.300	0.076	0.027	0.010	0.005
Jackhammer	0.138	0.035	0.012	0.004	0.002
Small Bulldozer	0.012	0.003	0.001	0.000	0.000
Source: PBS&J 2010.					

Short-term vibration would occur as a result of construction activities; however, excessive ground-borne vibration activities such as pile driving would not be required during construction. Sensitive receptors in the Project vicinity that are susceptible to the effect of groundborne vibration are the adjacent residential structures. Based on vibration levels shown in Table 5, construction activities would have the potential to emit groundborne vibration of 0.006 vibration decibels (VdB) within 150 feet of the limits of construction. As such, the anticipated levels of construction vibration associated with the Proposed Project would be considered imperceptible to barely

040132

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>perceptible and would cease at the conclusion of construction activities. Therefore, construction activities would not be anticipated to result in the generation of excessive groundborne vibration, thereby resulting in a less-than-significant impact.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>Operation of the Proposed Project would not result in a substantial permanent increase in ambient noise levels in the Project area above levels existing without the Proposed Project, as noted above. As such, impacts would be less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>As discussed above, noise generated during construction of the Proposed Project would not create substantial temporary or periodic increases in ambient noise levels. Furthermore, the Project applicant would inform nearby receptors of the planned construction hours. As noted above, construction equipment would be stored and maintained away from the existing sensitive receptors, to the extent feasible, and all equipment will be equipped with properly operating and maintained muffling devices, which would help to reduce any perceived increases in ambient noise levels during construction. As such, impacts would be considered less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

040133

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>No airports or private airstrips are located within 2 miles of the Project site. Since the Project site is not located within two miles of an airport or private airstrip, no impact associated with airport noise would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>XIII. POPULATION AND HOUSING</p> <p>Would the project:</p>				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>The Proposed Project would provide sufficient water and wastewater treatment capability for existing/planned uses at the CFMHA and would allow for the reuse of four residential units as residential units (with the movement of the existing CDC to the newly constructed structure). It should be noted that the potential increase in four</p>				

040134

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>residential units at the CMFHA is not considered substantial in light of the current Mono County population projections. Reuse of the four residential units</p> <p>The existing utility system is at, or at times beyond, capacity, and by upgrading the existing systems, consistent and reliable wastewater treatment service for current and anticipated uses within CFMHA would be provided, but would not directly or indirectly induce substantial population growth. No impact would occur.</p> <p>Mitigation Measures: No mitigation is required.</p>				
<p>b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>The Proposed Project would not involve the removal (temporary or permanent) of any residential structures within the CMFHA. It should be noted that four existing residential units would be returned to the existing housing stock of the CMFHA. No impact would occur.</p> <p>Mitigation Measures: No mitigation is required.</p>				
<p>c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>As noted above under Item XIII.b., the Proposed Project would not involve the removal (temporary or permanent) of any residential structures within the CMFHA. As such, substantial numbers of people would not be displaced by its implementation. No impact would occur.</p> <p>Mitigation Measures: No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XIV. PUBLIC SERVICES				
<p>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</p>				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>The Proposed Project does not include the construction of any new buildings or structures that would be available for residential occupancy, and the new structures would be designed and constructed in compliance with applicable fire code requirements. As such, the demand for emergency services (police and fire) is not anticipated to increase as a result of Project implementation. As such, no impact to police and fire services is anticipated.</p> <p>Operation of the proposed CDC would potentially increase on-site population by approximately four residential units. Assuming a student generation factor of approximately 0.5 students per residential unit, the demand for school services would be expected to increase by approximately 2 students within the Eastern Sierra Unified School District. This potential increase is not considered substantial in light of existing student populations within the district and the ability of local schools to accommodate such an increase. Impacts would be less than significant.</p> <p>The Proposed Project would result in the removal of the CMFHA playfield, located to the west of the proposed wastewater treatment plan, and north of Champagne Avenue. However, the playfield is not currently utilized by CMFHA residents except as a dog run. Under the Proposed Project, the playfield would be regraded and maintained as an open space area with native grasses. Because the existing playfield is not currently used for its designed recreational purpose, its removal would not create a need for additional recreational opportunities. Impacts would be less than significant.</p>				

040136

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Mitigation Measures:				
No mitigation is required.				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XV. RECREATION				
<p>a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Significance: Less than Significant Impact				
<p>As noted above under Item XIV.a., the Proposed Project would result in the removal of the existing playfield within the CMFHA. However, the playfield is not currently used for its designated purpose but as an occasional dog run. As such, it's removal is not anticipated to increase demand for recreational amenities locally or regionally. In addition, implementation of the Proposed Project would not interfere with the use of existing regional parkland or other recreation facilities. Impacts would be less than significant.</p>				
Mitigation Measures:				
No mitigation is required.				
<p>b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Significance: Less than Significant Impact				
<p>The Proposed Project would not include the construction or expansion of existing recreational facilities. As noted above, the existing CMFHA playfield, which is not used as a playfield, would be removed as part of the Proposed Project. Because the existing playfield is not used for its designed recreational purpose and it would be replaced with an open space area that could continue to serve as a dog run area, the</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Proposed Project is not considered to require the construction of recreational facilities elsewhere. As such, impacts would be less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>XVI. TRANSPORTATION/TRAFFIC</p> <p>Would the project:</p>				
<p>a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>During construction, a temporary increase in traffic flows along local roadways, including US 395, would occur as a result of construction-related traffic, such as deliveries to and from the Project site and construction personnel. However, construction-related traffic would be conducted in accordance with standard safety practices and applicable laws and regulations and would not substantially increase traffic congestion along local roadways. In addition, nearby residences, the California Department of Transportation (Caltrans), and the CDC would be contacted to inform them of the upcoming construction activities at the Project site. While not anticipated, if Caltrans determines that a traffic control plan is necessary to facilitate work within the public right-of-way (i.e., US 395), a traffic control plan would be designed and implemented to minimize construction traffic impacts to traffic on US 395.</p> <p>Upon completion of construction, the proposed USMC facilities would generate additional vehicle trips associated with the operation of the proposed USMC</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>commissary and four additional residential units. Up to 500 additional daily vehicle trips would occur as a result of implementation of the Proposed Project (commissary and four residential units). It should be noted that the majority of these trips already occur in the region but would be redirected to the site as a result of the local shopping opportunity that the proposed USMC commissary presents for the 634 active duty personnel, military reservists, military retirees, and military family members living within approximately 25 miles of the CMFHA. The additional trips associated with the proposed USMC commissary were previously evaluated in an environmental assessment (EA) prepared by the USMC and analyzed the potential impacts associated with the addition of 472 vehicle trips to the local roadway network. As noted in that EA, the predicted increase in traffic due to operation of the proposed USMC commissary would not result in a change in LOS for the intersection of US 395 and Champagne Avenue, or the segments of US 395 north and south of the CMFHA. The additional trips associated with the four operational residential units that may occur as a result of operation of the proposed CDC, would be expected to generate approximately 28 vehicle trips, which would equate to approximately 3 vehicle trips or less per hour during the day. This additional increase would, in combination with the 472 vehicle trips of the proposed USMC commissary, not be anticipated to substantially increase traffic volumes such that the efficiency of the local/regional roadway system would be affected.</p> <p>There would also be a slight increase in trips associated with the pumping of septic tanks, as the LLC would dispose of the sludge once every one to three months, instead of once a year, but an increase of two truck trips per month (one to the Project site and one away) would not be considered to substantially increase traffic levels. As a result, impacts would be considered less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>As noted above, the Proposed Project would not substantially increase traffic levels during either construction or operation activities. As such, it would not be considered to interfere with local plans regarding traffic management or congestion reduction. Impacts would be less than significant.</p> <p>Mitigation Measures: No mitigation is required.</p>				
<p>c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>The Project site is not located in the vicinity of an airport or airfield. Structures associated with the Proposed Project would be low-lying and would not affect air traffic patterns or safety. No impact would occur.</p> <p>Mitigation Measures: No mitigation is required.</p>				
<p>d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Significance: No Impact</p> <p>The Proposed Project would not include modifications to existing roadway/ intersection alignments. The proposed USMC commissary access road would be designed in a manner consistent with existing roadway design practices to prevent potential design feature hazards. No impact would occur.</p> <p>Mitigation Measures: No mitigation is required.</p>				
<p>e. Result in inadequate emergency access?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Significance: No Impact</p> <p>The Proposed Project would not include modifications to existing roadway/intersection alignments. Adequate emergency service access to the Project site would be provided along the proposed USMC commissary access road and continue to be provided via existing surface roads. No impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?</p> <p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> </p>				
<p>Significance: No Impact</p> <p>The Proposed Project would not include modifications to existing roadway/intersection alignments that support alternative transportation, such that interference or conflicts with current local/regional/state policies, plans, or programs supporting alternative transportation could occur. No impact would occur.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>XVII. UTILITIES AND SERVICE SYSTEMS</p> <p>Would the project:</p>				
<p>a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</p> <p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> </p>				
<p>Significance: Less than Significant Impact</p> <p>The existing wastewater effluent disposal method has increased nitrate concentrations in the ground water beneath the leach fields. Under the Proposed Project, the level of wastewater treatment at the CMFHA would be upgraded to a "tertiary" level with regard to nitrogen treatment and effluent would be discharged via</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>an underground effluent disposal system. In addition, water and nitrogen uptake by vegetation that would overlay the underground effluent disposal system would occur during the growing season in this vegetated area and further reduce nitrate concentrations in the underlying ground water.</p> <p>The Proposed Project would increase the level of wastewater treatment from primary to tertiary. As part of the anticipated wastewater treatment discharge permit for the Proposed Project, the Project applicant would conduct periodic monitoring of the wastewater effluent quality. The Project applicant submitted a Report of Waste Discharge on the wastewater treatment facility to the Water Board as effluent discharge capacity would increase from 39,000 gallons to 50,000 gallons. Treatment and discharge of the wastewater would be monitored and the Project applicant would notify the Water Board of any changes to ensure compliance with requirements. In the event that the Water Board modifies its discharge requirements, the Project applicant will comply with applicable requirements. Project implementation would ensure that the CMFHA water treatment capabilities would meet current/planned demands.</p> <p>The tertiary-treated effluent would represent an improvement in the quality of the wastewater effluent reaching the ground water, including reduced nitrate concentrations and reduced impacts to ground water quality. Furthermore, the Project applicant will comply with applicable requirements of the Waste Discharge Requirements. As such, impacts would be less than significant.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>The Proposed Project involves the construction of new water and wastewater treatment facilities to accommodate existing/planned demand for potable water supplies and wastewater treatment service within the CMFHA. To the extent that potential environmental effects associated with those facilities may occur, they have been acknowledged in Sections 1 through 18 herein. As noted in this Negative Declaration, impacts would result be less than significant.</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Mitigation Measures: No mitigation is required.</p>				
<p>c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>Under the Proposed Project, the size of the storm water infiltration basin would be resized to make room for the wastewater treatment system improvements but capacity would remain approximately 237,000 ft³ and the existing storm water drainage infrastructure would be rerouted to the resized basin. These changes would not reduce the ability of storm water infrastructure to manage storm water from up to the 100-year, 24-hour storm event. Furthermore, to the extent that potential environmental effects associated with those facilities may occur, they have been acknowledged in Sections 1 through 18 herein and would be less than significant.</p> <p>Mitigation Measures: No mitigation is required.</p>				
<p>d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: No Impact</p> <p>The Proposed Project would increase the demand for potable water service associated with the CMFHA by approximately 1,624 gpd. Existing and future water supplies would be provided via ground water wells located at the CMFHA and the existing delivery system can accommodate the future demand associated with the Proposed Project. Based on the capacity/supplies of the existing Antelope Valley Basin, which is up to 52,136 million gallons (Mono County 2001) or 170,000 AF, the potential increase in potable water demand at the CMFHA is considered minimal with respect to existing ground water supplies in the area. Impacts would be less than significant.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Mitigation Measures: No mitigation is required.</p>				
<p>e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>All wastewater would be treated onsite and would not be distributed to or affect any local or state jurisdictions. The purpose of the Proposed Project is to ensure adequate capacity and improve treatment of potable water and wastewater for all existing/planned uses associated with the CMFHA, including the Proposed Project. Impacts would be less than significant.</p> <p>Mitigation Measures: No mitigation is required.</p>				
<p>f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>g. Comply with federal, state, and local statutes, and regulations related to solid waste?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>Sludge from the proposed wastewater treatment facility and solid waste from the proposed USMC commissary and four residential units would be transported from the Project site in accordance with applicable regulations related to its disposal once every one to three months to one of the three active, permitted landfills within Mono County (Walker Landfill, Pumice Valley Landfill, and Benton Crossing Landfill) that accept sludge/bio solids. Based on the daily capacity and average throughput of the aforementioned landfills, the Proposed Project would not substantially affect solid-waste disposal capacity in the region. Impacts would be less than significant.</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>XVIII. MANDATORY FINDINGS OF SIGNIFICANCE</p>				
<p>a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</p>				
<p>Significance: Less than Significant Impact</p> <p>The Proposed Project, as noted above, would not occur in areas providing significant environmental habitat for fish or wildlife species and/or cultural or historic resources. As part of the Proposed Project, measures to minimize potential impacts to migratory birds and raptors have been adopted and would be implemented. Additionally, following the completion of construction, the Project applicant would re-plant all disturbed areas with grass and shrub species consistent with pre-existing vegetation.</p> <p>As discussed in the Biological Resources discussion, the Project site does not support any sensitive natural communities, wetlands or other waters of the U.S. As such, the Proposed Project is not expected to threaten fish, wildlife, or plant populations. Procedures are in place to evaluate potential habitat before disturbance and to respond to the discovery of historical or cultural resources. Therefore, the Proposed Project would have a less than significant impact.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>The Proposed Project is located in a largely rural area, and potential cumulative impacts would largely be restricted to those that would occur within the CMFHA itself. No other projects are proposed within the CMFHA would occur within the foreseeable future other than the proposed USMC commissary and CDC, which are analyzed in this document, that could be considered cumulatively considerable with the Proposed Project. As such, the Proposed Project would be considered to have less than significant cumulative impacts with its implementation.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				
<p>c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Significance: Less than Significant Impact</p> <p>As noted above, the Proposed Project would not result in potentially significant environmental impacts on human beings, including those related to air quality, hazards and hazardous materials, geologic hazards, greenhouse gas emissions, noise, public services, transportation/traffic, and utilities/service systems. As such, the implementation of the Project is expected to have a less than significant impact directly or indirectly to human beings based on impacts discussed in this document.</p> <p>Mitigation Measures:</p> <p>No mitigation is required.</p>				

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APPENDIX A
AIR QUALITY CALCULATIONS

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Urbemis 2007 Version 9.2.4

Combined Summer Emissions Reports (Pounds/Day)

File Name:

Project Name: Coleville MFH Area Improvements

Project Location: California State-wide

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

Summary Report:

CONSTRUCTION EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10 Dust</u>	<u>PM10 Exhaust</u>	<u>PM10</u>	<u>PM2.5 Dust</u>	<u>PM2.5 Exhaust</u>	<u>PM2.5</u>	<u>CO2</u>
2011 TOTALS (lbs/day unmitigated)	8.06	69.53	33.87	0.00	50.01	2.92	52.93	10.45	2.69	13.13	7,551.20
2011 TOTALS (lbs/day mitigated)	8.06	69.53	33.87	0.00	25.91	2.92	28.84	5.41	2.69	8.10	7,551.20

AREA SOURCE EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (lbs/day, unmitigated)	0.73	0.28	4.81	0.00	0.02	0.02	276.32

OPERATIONAL (VEHICLE) EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (lbs/day, unmitigated)	3.77	4.23	37.44	0.03	6.44	1.25	3,734.71

SUM OF AREA SOURCE AND OPERATIONAL EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (lbs/day, unmitigated)	4.50	4.51	42.25	0.03	6.46	1.27	4,011.03

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Construction Unmitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Summer Pounds Per Day, Unmitigated

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10 Dust</u>	<u>PM10 Exhaust</u>	<u>PM10</u>	<u>PM2.5 Dust</u>	<u>PM2.5 Exhaust</u>	<u>PM2.5</u>	<u>CO2</u>
Time Slice 3/1/2011-4/29/2011 Active Days: 44	8.06	69.53	33.87	0.00	50.01	2.92	52.93	10.45	2.69	13.13	7,551.20
Fine Grading 03/01/2011-04/30/2011	8.06	69.53	33.87	0.00	50.01	2.92	52.93	10.45	2.69	13.13	7,551.20
Fine Grading Dust	0.00	0.00	0.00	0.00	50.00	0.00	50.00	10.44	0.00	10.44	0.00
Fine Grading Off Road Diesel	8.00	69.42	31.83	0.00	0.00	2.92	2.92	0.00	2.68	2.68	7,346.82
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.07	0.11	2.04	0.00	0.01	0.01	0.02	0.00	0.00	0.01	204.38
Time Slice 5/2/2011-5/31/2011 Active Days: 22	4.59	35.97	21.82	0.00	0.01	1.98	1.99	0.00	1.82	1.82	3,713.42
Trenching 05/01/2011-05/31/2011	4.59	35.97	21.82	0.00	0.01	1.98	1.99	0.00	1.82	1.82	3,713.42
Trenching Off Road Diesel	4.53	35.87	20.03	0.00	0.00	1.97	1.97	0.00	1.82	1.82	3,534.58
Trenching Worker Trips	0.06	0.10	1.78	0.00	0.01	0.00	0.01	0.00	0.00	0.01	178.84
Time Slice 6/1/2011-10/31/2011 Active Days: 109	4.00	29.48	15.90	0.00	0.01	1.59	1.60	0.00	1.46	1.47	4,093.89
Building 06/01/2011-10/31/2011	4.00	29.48	15.90	0.00	0.01	1.59	1.60	0.00	1.46	1.47	4,093.89
Building Off Road Diesel	3.93	29.18	14.13	0.00	0.00	1.58	1.58	0.00	1.45	1.45	3,888.40
Building Vendor Trips	0.02	0.22	0.19	0.00	0.00	0.01	0.01	0.00	0.01	0.01	46.74
Building Worker Trips	0.05	0.09	1.58	0.00	0.01	0.00	0.01	0.00	0.00	0.01	158.76

Phase Assumptions

Phase: Fine Grading 3/1/2011 - 4/30/2011 - Default Fine Site Grading Description

Total Acres Disturbed: 5.56

Maximum Daily Acreage Disturbed: 2.5

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Page: 3

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Fugitive Dust Level of Detail: Default

20 lbs per acre-day

On Road Truck Travel (VMT): 0

Off-Road Equipment:

1 Excavators (168 hp) operating at a 0.57 load factor for 8 hours per day

1 Graders (174 hp) operating at a 0.61 load factor for 8 hours per day

2 Off Highway Trucks (479 hp) operating at a 0.57 load factor for 8 hours per day

2 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 8 hours per day

2 Water Trucks (189 hp) operating at a 0.5 load factor for 4 hours per day

Phase: Trenching 5/1/2011 - 5/31/2011 - Default Paving Description

Off-Road Equipment:

2 Excavators (168 hp) operating at a 0.57 load factor for 8 hours per day

1 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 8 hours per day

2 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 8 hours per day

2 Water Trucks (189 hp) operating at a 0.5 load factor for 4 hours per day

Phase: Building Construction 6/1/2011 - 10/31/2011 - Default Building Construction Description

Off-Road Equipment:

1 Bore/Drill Rigs (291 hp) operating at a 0.75 load factor for 8 hours per day

1 Cranes (399 hp) operating at a 0.43 load factor for 8 hours per day

1 Forklifts (145 hp) operating at a 0.3 load factor for 8 hours per day

2 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 8 hours per day

2 Welders (45 hp) operating at a 0.45 load factor for 8 hours per day

2 Water Trucks (189 hp) operating at a 0.5 load factor for 4 hours per day

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Construction Mitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Summer Pounds Per Day, Mitigated

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10 Dust</u>	<u>PM10 Exhaust</u>	<u>PM10</u>	<u>PM2.5 Dust</u>	<u>PM2.5 Exhaust</u>	<u>PM2.5</u>	<u>CO2</u>
Time Slice 3/1/2011-4/29/2011 Active Days: 44	8.06	69.53	33.87	0.00	25.91	2.92	28.84	5.41	2.69	8.10	7,551.20
Fine Grading 03/01/2011-04/30/2011	8.06	69.53	33.87	0.00	25.91	2.92	28.84	5.41	2.69	8.10	7,551.20
Fine Grading Dust	0.00	0.00	0.00	0.00	25.91	0.00	25.91	5.41	0.00	5.41	0.00
Fine Grading Off Road Diesel	8.00	69.42	31.83	0.00	0.00	2.92	2.92	0.00	2.68	2.68	7,346.82
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.07	0.11	2.04	0.00	0.01	0.01	0.02	0.00	0.00	0.01	204.38
Time Slice 5/2/2011-5/31/2011 Active Days: 22	4.59	35.97	21.82	0.00	0.01	1.98	1.99	0.00	1.82	1.82	3,713.42
Trenching 05/01/2011-05/31/2011	4.59	35.97	21.82	0.00	0.01	1.98	1.99	0.00	1.82	1.82	3,713.42
Trenching Off Road Diesel	4.53	35.87	20.03	0.00	0.00	1.97	1.97	0.00	1.82	1.82	3,534.58
Trenching Worker Trips	0.06	0.10	1.78	0.00	0.01	0.00	0.01	0.00	0.00	0.01	178.84
Time Slice 6/1/2011-10/31/2011 Active Days: 109	4.00	29.48	15.90	0.00	0.01	1.59	1.60	0.00	1.46	1.47	4,093.89
Building 06/01/2011-10/31/2011	4.00	29.48	15.90	0.00	0.01	1.59	1.60	0.00	1.46	1.47	4,093.89
Building Off Road Diesel	3.93	29.18	14.13	0.00	0.00	1.58	1.58	0.00	1.45	1.45	3,888.40
Building Vendor Trips	0.02	0.22	0.19	0.00	0.00	0.01	0.01	0.00	0.01	0.01	46.74
Building Worker Trips	0.05	0.09	1.58	0.00	0.01	0.00	0.01	0.00	0.00	0.01	158.76

Construction Related Mitigation Measures

The following mitigation measures apply to Phase: Fine Grading 3/1/2011 - 4/30/2011 - Default Fine Site Grading Description

For Soil Stabilizing Measures, the Water exposed surfaces 3x daily watering mitigation reduces emissions by:

PM10: 61% PM25: 61%

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Area Source Unmitigated Detail Report:

AREA SOURCE EMISSION ESTIMATES Summer Pounds Per Day, Unmitigated

<u>Source</u>	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
Natural Gas	0.02	0.22	0.17	0.00	0.00	0.00	267.89
Hearth							
Landscape	0.37	0.06	4.64	0.00	0.02	0.02	8.43
Consumer Products	0.20						
Architectural Coatings	0.14						
TOTALS (lbs/day, unmitigated)	0.73	0.28	4.81	0.00	0.02	0.02	276.32

Area Source Changes to Defaults

Operational Unmitigated Detail Report:

OPERATIONAL EMISSION ESTIMATES Summer Pounds Per Day, Unmitigated

<u>Source</u>	<u>ROG</u>	<u>NOX</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM25</u>	<u>CO2</u>
Condo/townhouse general	0.21	0.27	2.47	0.00	0.41	0.08	238.35
Elementary school	0.86	0.01	0.07	0.00	0.01	0.00	7.34
Discount club	2.70	3.95	34.90	0.03	6.02	1.17	3,489.02
TOTALS (lbs/day, unmitigated)	3.77	4.23	37.44	0.03	6.44	1.25	3,734.71

Operational Settings:

Does not include correction for passby trips

Does not include double counting adjustment for internal trips

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APPENDIX B
RESULTS OF RECONNAISSANCE LEVEL NATURAL RESOURCES SURVEY
VEGETATION SURVEY - COLEVILLE MILITARY FAMILY HOUSING AREA
SEPTEMBER 2009

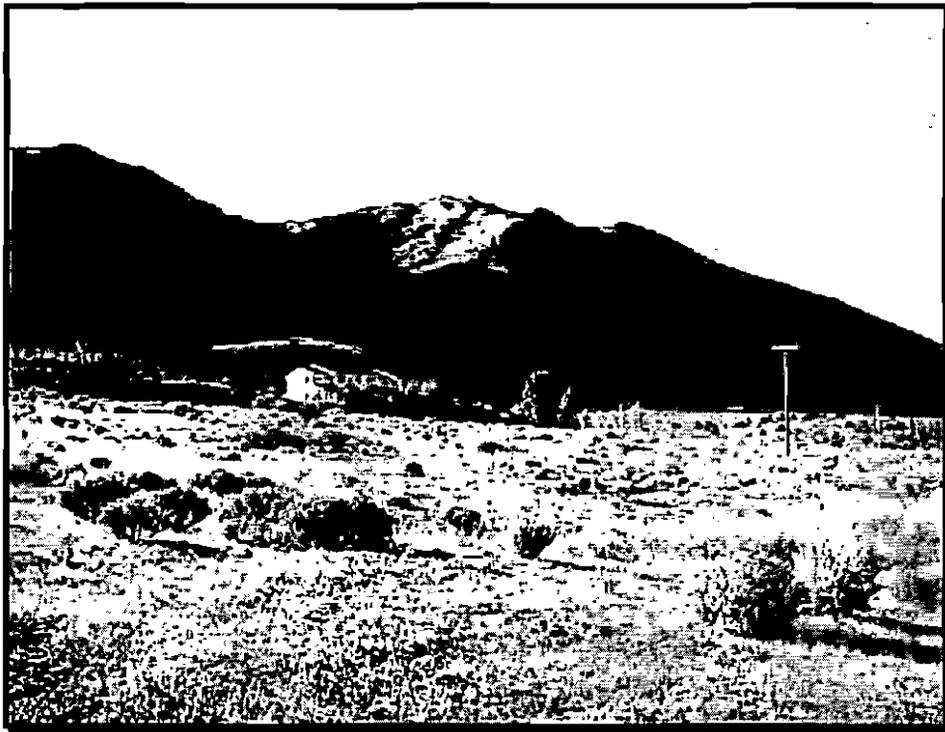
040155

SECRET

**VEGETATION SURVEY
COLEVILLE MILITARY FAMILY HOUSING AREA**

**U.S. MARINE CORPS
MOUNTAIN WARFARE TRAINING CENTER (MWTC)
BRIDGEPORT, CA**

CONTRACT NO. N62473-09-D-2603, T.O. 020



OCTOBER 2009

Prepared for:
NAVFAC Southwest, Central IPT
1220 Pacific Highway
San Diego, CA 92132

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VEGETATION SURVEY
COLEVILLE MILITARY FAMILY HOUSING AREA
MOUNTAIN WARFARE TRAINING CENTER
BRIDGEPORT, CALIFORNIA

TABLE OF CONTENTS

1.0 Introduction..... 1

 1.1 Commissary 1

 1.2 Leach Field..... 1

2.0 Methodology 1

 2.1 Survey Planning 1

 2.1.1 Field Investigation..... 1

3.0 Results..... 3

4.0 Conclusion 9

 4.1 Commissary 9

 4.2 Leach Field..... 9

5.0 References..... 9

Appendix A.....5-1

Appendix B.....5-41

LIST OF FIGURES

Figure 1. Commissary and Leach Field Project Areas.....2

Figure 2. Plant Communities in the Proposed Commissary and Leach Field Survey Areas.....5

Figure 3. Potential Wetland Investigation Data Points in the Proposed Commissary Survey Area.....8

LIST OF TABLES

Table 1. Plant Communities within the Commissary and Leach Field Survey Areas.....4

040157

1.0 INTRODUCTION

TEC conducted a vegetation survey of the areas associated with the proposed Coleville Military Family Housing (MFH) Area Commissary and the existing leach field area. TEC surveyed both the proposed project and leach field areas for vegetation and classified the vegetation by plant community. Figure 1 illustrates the survey areas. The scope of the surveys was to conduct a site reconnaissance survey of the vegetation communities present at the proposed commissary and leach field sites.

1.1 Commissary

The USMC proposes developing the proposed project site into the Coleville MFH Area Commissary, which would provide a grocery and supply store for the local residents.

1.2 Leach Field

The USMC established the leach field for processing wastewater from the Coleville MFH Area. A baseball field currently overlies the leach field.

2.0 METHODOLOGY

2.1 Survey Planning

Vegetation mapping was conducted in early fall 2009 by TEC Inc. An overview vegetation map was prepared prior to field investigations utilizing Geographic Information Systems data (U.S. Marine Corps Mountain Warfare Training Center Bridgeport 2007). The survey areas included an additional 100-foot (30-m) buffer surrounding each survey site.

2.1.1 Field Investigation

A TEC biologist conducted the vegetation survey on 22 and 23 September 2009. Plant communities were ground-truthed and mapped using the U.S. Forest Service (USFS) vegetation classification system, Calveg, for Zone 3 (North Sierran Ecological Province) and Zone 9 (Great Basin Ecological Province) (USFS 2008 and 2009). Appendix A contains a list of plant and wildlife species observed during the survey.

A California Natural Diversity Database search was conducted for federal or state listed species, and rare or species of special concern.

During the survey, the TEC biologist investigated a potential wetland area utilizing the three-parameter approach as stipulated by the Regional Supplement to the U.S. Army Corps of Engineers (USACE) Wetland Delineation Manual: Arid West Region (Version 2.0) (USACE 2008). This manual was determined to be the best fit for the area, since the survey area is located on the downslope edge of the Antelope Valley.

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Figure 1. Commissary and Leach Field Survey Areas

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Meters

0 12.5 25
0 50 100
Feet

3.0 RESULTS

The proposed commissary site is located on a south-facing slope dominated Big Basin Sagebrush Alliance. Other plant community types include Disturbed-Big Basin Sagebrush Alliance, which was burned in a June 2007 fire, and a riparian woodland, Black Cottonwood Alliance and Saltbush Alliance. The leach field is a level recreation area, namely a baseball field, completely fenced, with bleachers on the south-side, and dominated by Urban or Developed community type. Other plant community types include Non-Native/Ornamental Grass Alliance, Black Cottonwood Alliance, and Big Basin Sagebrush Alliance. Descriptions of each plant community found within the survey area follow. Table 3-1 presents the acreage of each plant communities within the survey area

Big Basin Sagebrush Alliance. Big sagebrush (*Artemisia tridentata*) dominates Big Basin Sagebrush forms dominant stands in this alliance. This community type occurs in elevation ranges of 4,800 to 7,400 ft (1,464 to 2,256 m). Eastside species such as Jeffrey pine (*Pinus jeffreyi*), bitterbrush (*Purshia tridentata*), curlleaf mountain mahogany (*Cercocarpus ledifolius*), and several species of rabbitbrush (*Chrysothamnus* spp.) occur in close proximity in this zone. In the proposed project site this is the dominant plant community type, interspersed with rabbitbrush (*Chrysothamnus nauseosus*), singleleaf pinyon pine (*Pinus monophylla*), whitethorn ceanothus (*Ceanothus cordulatus*), desert ceanothus (*Ceanothus greggii*), Russian thistle (*Salsola kali*), tumble mustard (*Sisymbrium altissimum*), common mallow (*Malva neglecta*), and skeletonweed (*Stephanomeria spinosa*).

Black Cottonwood Alliance. Black cottonwood (*Populus trichocarpa*), a riparian woodland, occurs in the northern Sierra Nevada Mountains more commonly than does Fremont cottonwood (*Populus fremontii*), but their ranges occasionally overlap. Over its broad range in California, it may occur at elevations up to about 9,000 ft (2,800 m). Being shade intolerant, it requires freshly deposited alluvial materials for its maintenance in the absence of competing trees, and stands are often even-aged as result of episodic flood events. However, tree or shrub willows (*Salix* spp.), are often present as a minor component in this type. In the proposed project site, this Alliance contains cottonwood species (*Populus trichocarpa* and *P. fremontii*) with a few individuals of narrowleaf willow (*Salix exigua*) and an understory dominated by yarrow (*Achillea millefolium*) and tumble mustard (*Sisymbrium altissimum*).

Disturbed Big Basin Sagebrush Alliance. This Alliance is disturbed Big Basin Sagebrush Alliance, which was burned in the June 2007 fire. Species currently present are representative of the species listed in the Big Basin Sagebrush Alliance above; however, there is a larger percent of open bare ground. Other species observed were winter fat (*Krascheninnikovia lanata*) and skeletonweed is more abundant in this area than in Big Basin Sagebrush Alliance.

Non-Native/Ornamental Grass Alliance. Ornamental or non-native grass species define this Alliance, some of which may become invasive weeds. Other non-native conifers, hardwoods, and shrubs may be associated as minor elements. Mapped areas of this Alliance are usually in developed areas, including urban and residential landscapes, parks, highways, cemeteries, etc. Landscaped grass, located adjacent to houses on the west side of the proposed project site, dominates this Alliance. In the leach field area this Alliance is characterized by weedy disturbed species and is interspersed by curly gumweed (*Grindelia squarrosa*), Russian thistle, tumble mustard, common mallow, horehound (*Marrubium vulgare*), various brome grasses (*Bromus* spp.), and annual bur-sage (*Ambrosia acanticarpa*).

Saltbush Alliance. This Alliance, in which any combination of saltbush species (*Atriplex* spp.) forms the dominant shrub genus. It occurs in widely scattered areas from Modoc to Inyo Counties. Both shadscale or spiny saltbush (*A. confertifolia*) and fourwing saltbush (*A. canescens*) occur from northern Owens

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Valley to Kern County. Shadscale is generally located on dry alkaline plains and hills on the east slopes of the Sierra Nevada in Mono, Kern, and Inyo Counties. Fourwing saltbush may be abundant on saline desert flats and washes of the same counties, where it is its own Alliance. Other saltbush species may be included in this Alliance such as allscale (*A. pycarpa*) in addition to minor amounts of sagebrush (*Artemisia* spp.), creosote bush (*Larrea tridentata*) and grasses. Sites are generally flat, saline, alluvial deposits with elevations between 3,800 and 6,600 ft (1,160 to 2,212 m). These include toeslopes of alluvial fans as well as in Owens Valley (Mono Section) where rabbitbrush species are not dominant. At the proposed project site, spiny saltbush and fourwing saltbush, interspersed with rabbitbrush dominate this Alliance. This Alliance occurs in the toeslope on the west side of the housing area.

Urban or Developed. This category applies to landscapes that are dominated by urban structures, residential units, or other developed land use elements such as highways, city parks, cemeteries and the like. This Alliance includes the sidewalks and pavement for the housing development on the west side.

Urban-Related Bare Soil. Urban development in California occurs in phases. During grading prior to construction, this type represents the occurrence of non-vegetated barren ground caused by urbanization. This land-use type also represents other mechanically caused barren ground, such as open quarries or mined areas, barren ground along highways and other areas cleared of vegetation prior to construction. This type often occurs adjacent to managed landscapes in already established urban centers or other paved areas. This community type is located on the south end of the proposed project site. Telephone poles and their buffers are also included in this plant community.

Table 1. Plant Communities within the Survey Areas

Plant Community	Proposed Commissary		Leach Field	
	Acres	Square Feet	Acres	Square Feet
Big Basin Sagebrush Alliance	2.91	126,758	0.60	26,135
Black Cottonwood Alliance	0.06	2,614	0.35	15,246
Disturbed-Big Basin Sagebrush Alliance	1.58	68,824	-	-
Non-Native/Ornamental Grass Alliance	0.10	4,356	0.30	13,068
Saltbush Alliance	0.07	3,049	-	-
Urban or Developed	1.26	54,885	1.09	47,480
Urban-Related Bare Soil	1.63	71,002	-	-
Total	7.61	331,488	2.34	101,929

Special-Status Species

No federally listed plant or wildlife species were detected during the vegetation survey and no previous records indicate listed species in the project footprint (California Natural Diversity Database [CNDDDB] 2009a and 2009b).

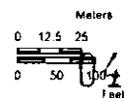
No special-status plant, sensitive plant communities, or wildlife species were detected in the proposed project site during vegetation and wildlife surveys and no previous records indicate rare plants, wildlife, or sensitive plant communities within the survey areas or within several miles of the area (CNDDDB 2009a and 2009b).

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Figure 2. Plant Communities in the Commissary and Leach Field Survey Areas



Aquatic Habitats

The only potential aquatic habitat, Black Cottonwood Alliance, a riparian woodland, occurs at the base of the steep grade in the northwest corner of the proposed commissary area. An approximately 10-inch (25-centimeter) wide concrete culvert empties into this area. The culvert appears to channel surface runoff from the developed areas above. Soil almost completely occludes the culvert. A broken sprinkler head is in the riparian area, as are other sprinklers believe to be part of an irrigation system. It is unknown if this system is currently in use; however, the soil was noticeable wet just west (down gradient) from the culvert and broken sprinkler.

During the site reconnaissance survey, a certified wetlands biologist conducted a wetland determination for the riparian woodland to determine if the area was a wetland. The biologist applied the three-parameter approach as stipulated by the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0) (USACE 2008). The riparian woodland met the parameter for hydrology; however, it did not meet the parameter for vegetation and hydric soils. Therefore, this riparian habitat is not a wetland. No other aquatic habitats occur within the proposed project site. No other aquatic habitats occur within the proposed commissary or leach field areas. Appendix B contains Wetland Determination Data Sheets.



Photo 1: Riparian area.



Photo 2: Concrete culvert.

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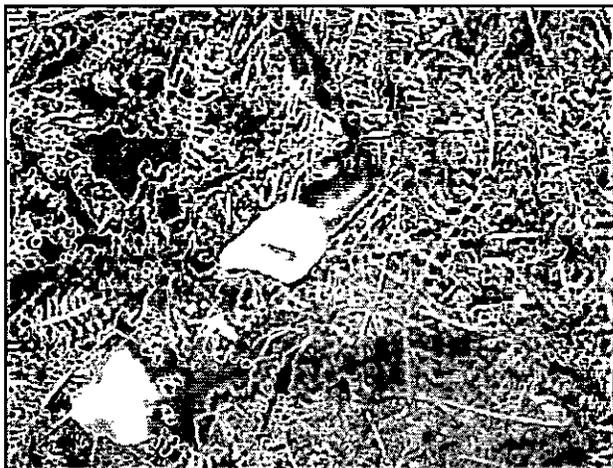


Photo 3: Broken sprinkler.



Photo 4: Soil Data Point 1A.



Photo 5: Soil Data Point 1B.

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LEGEND

-  Survey for Potential Wetland Area
-  Commissary Survey Area

Plant Communities

-  Big Basin Sagebrush Alliance
-  Black Cottonwood Alliance
-  Disturbed-Big Basin Sagebrush Alliance (Burned)
-  Non-Native/Ornamental Grass Alliance
-  Saltbush Alliance
-  Urban or Developed
-  Urban-Related Bare Soil

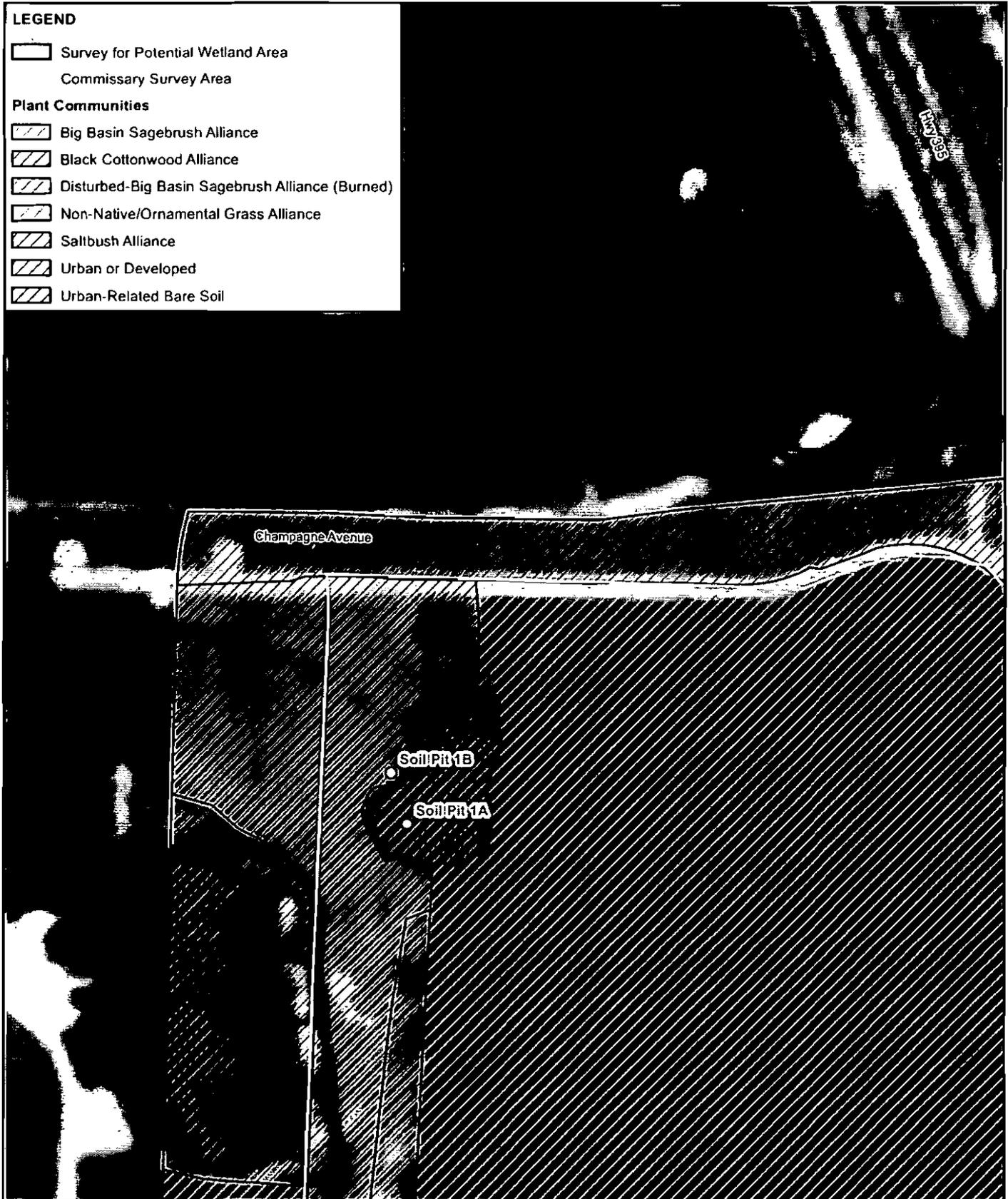


Figure 3. Potential Wetland Investigation Data Points in the Commissary Survey Area

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0 5 10 Meters 20 30
 0 25 50 Feet 100



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4.0 CONCLUSION

4.1 Commissary

There were no federal, state, or special species of concern observed in the commissary project area. The riparian woodland area is not a wetland; however, if current conditions continue, this area may become a wetland in the near future.

4.2 Leach Field

There were no federal, state, or special species of concern observed in the leach field project area.

5.0 REFERENCES

California Natural Diversity Database [CNDDDB]. 2009a. California Natural Diversity Database. State of California, the Natural Resources Agency, Department of Fish and Game, Biogeographic Data Branch. July.

_____. 2009b. Record search of CNDDDB Biogeographic Data Branch. 1-October.

United States Army Corps of Engineers [USACE]. 2008. US Army Corps of Engineers. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2). Final Report. September.

United States Forest Service [USFS]. 2008. US Forest Service Vegetation Classification (Calveg System), Descriptions and Keys for Zone 3 (North Sierran Ecological Province). Region 5, Remote Sensing Lab. 17 December. <http://www.fs.fed.us/r5/rsl/projects/classification/>.

_____. 2009. US Forest Service Vegetation Classification (Calveg System), Descriptions and Keys for Zone 9 (Great Basin Ecological Province). Region 5, Remote Sensing Lab. 23 March. <http://www.fs.fed.us/r5/rsl/projects/classification/>.

U.S. Marine Corps Mountain Warfare Training Center Bridgeport. 2007. Geographic Information System data.

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APPENDIX A

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Species List**Commissary and Leach Field Survey Areas**Plants-Observed during surveys.annual bur-sage (*Ambrosia acanticarpa*)big sagebrush (*Artemisia tridentata*)black cottonwood (*Populus trichocarpa*)brome grasses (*Bromus* spp.)common mallow (*Malva neglecta*)curly gumweed (*Grindelia squarrosa*)desert ceanothus (*Ceanothus greggii*)four-wing saltbush (*A. canescens*)Fremont Cottonwood (*Populus fremontii*)horehound (*Marrubium vulgare*)narrowleaf willow (*Salix exigua*)rabbitbrush (*Chrysothamnus nauseosus*)Russian thistle (*Salsola kali*)singleleaf pinyon pine (*Pinus monophylla*)skeletonweed (*Stephanomeria spinosa*)spiny saltbush (*A. confertifolia*)tumble mustard (*Sisymbrium altissimum*)white ash (*Fraxinus americana*)whitethorn ceanothus (*Ceanothus cordulatus*)winter fat (*Krascheninnikovia lanata*)yarrow (*Achillea millefolium*)Birds-Observed during surveys or known to occur in the project area.red-tailed hawk (*Buteo jamaicensis*)barn owl (*Tyto alba*)Brewer's blackbird (*Euphagus cyanocephalus*)California quail (*Calipepla californica*)common raven (*Corvus corax*)white-crowned sparrow (*Zonotrichia leucophrys*)

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Mammals-Observed during surveys or known to occur in the project area.

black bear (*Ursus americanus*)

black-tailed jackrabbit (*Lepus californicus*)

bobcat (*Lynx rufus*)

California ground squirrel (*Spermophilus beecheyi*)

coyote (*Canis latrans*)

grey fox (*Urocyon cinereoargenteus*)

mule deer (*Odocoileus hemionus*)

mountain cottontail (*Sylvilagus nuttallii*)

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APPENDIX B

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WETLAND DETERMINATION FORM - Arid West Region

Project/Site: Military Family Housing Area Commissary City/County: Coleville - Mono County Sampling Date: September 24, 2009
 Applicant/Owner: Marine Corps Mountain Warfare Training Center, Lincoln Housing Area State: CA Sampling Point: 1A
 Investigator(s): Robin Kirmont Section, Township, Range: _____
 Landform (hillslope, terrace, etc.): Hillslope Local relief (concave, convex, none): None Slope (%): 4
 Subregion (LRR): _____ Lat: 38 35'14.019 N Long: 119 30'56.613 W Datum: UTM Zone 11N
 Soil Map Unit Name: _____ NWI classification: _____
 Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No _____ (If no, explain in Remarks)
 Are Vegetation N, Soil Y, or Hydrology N significantly disturbed? Are "Normal Circumstances" present? Yes _____ No X
 Are Vegetation N, Soil N, or Hydrology N naturally problematic (If needed, explain any answers in Remarks)

SUMMARY OF FINDINGS - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes _____ No <u>X</u>	Is the Sampled Area within a wetland? Yes _____ No <u>X</u>
Hydric Soil Present?	Yes _____ No <u>X</u>	
Wetland Hydrology Present?	Yes <u>Y</u> No _____	
Remarks: <u>Soil in area appears to be previously disturbed from grading of the housing pads in 1984. Sprinkler system in place, broken sprinkler in riparian area. Concrete culvert (10-12") is upslope from area and is 90% clogged. Soil is moist.</u>		

VEGETATION -- Use scientific names of plants.

Tree Stratum	Plot Size	10m	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet:																									
1			<u>40</u>		<u>FACW</u>	Number of Dominant Species That are OBL, FACW, or FAC: <u>2</u> (A) Total Number of Dominant Species Across All Strata: <u>4</u> (B) Percent of Dominant Species That are OBL, FACW, or FAC: <u>0.50</u> (A/B) (must be >0.5)																									
2			<u>10</u>		<u>UPL</u>																										
3			<u>15</u>		<u>FACW</u>																										
4																															
Total Cover:			<u>65</u>																												
Sapling/Shrub Stratum		Plot Size				Prevalence Index worksheet (test when Hydro and Soils indicate wetlands) Total % Cover (absolute) of: <table style="width:100%; border: none;"> <tr> <td>OBL species</td> <td><u>0</u></td> <td>x 1 =</td> <td><u>0</u></td> </tr> <tr> <td>FACW species</td> <td><u>55</u></td> <td>x 2 =</td> <td><u>110</u></td> </tr> <tr> <td>FAC species</td> <td><u>0</u></td> <td>x 3 =</td> <td><u>0</u></td> </tr> <tr> <td>FACU species</td> <td><u>85</u></td> <td>x 4 =</td> <td><u>340</u></td> </tr> <tr> <td>UPL species</td> <td><u>30</u></td> <td>x 5 =</td> <td><u>150</u></td> </tr> <tr> <td>Column Totals:</td> <td><u>170</u></td> <td>(A)</td> <td><u>600</u></td> <td>(B)</td> </tr> </table> Prevalence Index = B/A = <u>3.529412</u> (must be ≤3.0)	OBL species	<u>0</u>	x 1 =	<u>0</u>	FACW species	<u>55</u>	x 2 =	<u>110</u>	FAC species	<u>0</u>	x 3 =	<u>0</u>	FACU species	<u>85</u>	x 4 =	<u>340</u>	UPL species	<u>30</u>	x 5 =	<u>150</u>	Column Totals:	<u>170</u>	(A)	<u>600</u>	(B)
OBL species	<u>0</u>	x 1 =	<u>0</u>																												
FACW species	<u>55</u>	x 2 =	<u>110</u>																												
FAC species	<u>0</u>	x 3 =	<u>0</u>																												
FACU species	<u>85</u>	x 4 =	<u>340</u>																												
UPL species	<u>30</u>	x 5 =	<u>150</u>																												
Column Totals:	<u>170</u>	(A)	<u>600</u>	(B)																											
1																															
2																															
3																															
4																															
Total Cover:																															
Herb Stratum		Plot Size				Hydrophytic vegetation indicators No _____ Dominance test is >50% No _____ Prevalence index is ≤ 3.0 ¹ Morphological adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) Yes _____ Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soils and wetland hydrology must be present, unless disturbed or problematic. Hydrophytic Vegetation Present? Yes _____ No <u>X</u>																									
1			<u>20</u>		<u>UPL</u>																										
2			<u>10</u>		<u>FACU+</u>																										
3			<u>75</u>		<u>FACU</u>																										
4																															
5																															
6																															
7																															
Total Cover:			<u>105</u>																												
Woody Vine Stratum		Plot Size																													
1																															
2																															
Total Cover:																															
% Bare ground in Herb Stratum		<u>0</u>	% Cover of Biotic Crust		<u>0</u>																										

Remarks: Willows growing at the mouth of the concrete culvert. Hydrophytic vegetation may continue to colonize if current conditions persist.

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SOIL

Sampling point: 1A

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-6	2.5YR3/2	80	10YR4/4	20	D	M	Loamy Silt	Gravel
6-13	2.5YR3/3	100					Loamy Sand	Gravel and rock.
13-14	2.5YR4/3	100					Loamy Sand	Gravel and rock.

¹Type: C=Concretion, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. ²Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

<input type="checkbox"/> Histosol (A1)	<input type="checkbox"/> Sandy Redox (S5)	Indicators for Problematic Hydric Soils: ³ <input type="checkbox"/> 1 cm Muck (A9) (LRR C) <input type="checkbox"/> 2 cm Muck (A 10) (LRR B) <input type="checkbox"/> Reduced Vertic (F18) <input type="checkbox"/> Red Parent Material (TF2) <input checked="" type="checkbox"/> Other (Explain in Remarks)
<input type="checkbox"/> Histic Epipedon (A2)	<input type="checkbox"/> Stripped Matrix (S6)	
<input type="checkbox"/> Black Histic (A3)	<input type="checkbox"/> Loamy Mucky Mineral (F1)	
<input type="checkbox"/> Hydrogen Sulfide (A4)	<input type="checkbox"/> Loamy Gleyed Matrix (F2)	
<input type="checkbox"/> Stratified Layers (A5) (LRR C)	<input type="checkbox"/> Depleted Matrix (F3)	
<input type="checkbox"/> 1 cm Muck (A9) (LRR D)	<input type="checkbox"/> Redox Dark Surface (F6)	
<input type="checkbox"/> Depleted Below Dark Surface (A11)	<input type="checkbox"/> Depleted Dark Surface (F7)	
<input type="checkbox"/> Thick Dark Surface (A12)	<input type="checkbox"/> Redox Depressions (F8)	
<input type="checkbox"/> Sandy Mucky Mineral (S1)	<input type="checkbox"/> Vernal Pool (F9)	
<input type="checkbox"/> Sandy Gleyed Matrix (S4)		

³Indicators of hydrophytic vegetation and wetland hydrology must be present

Restrictive Layer (if present):

Type: Rock
 Depth (inches): 14

Hydric Soil Present? Yes No

Remarks: Soils appear to be Indicator F7. Depleted Dark Surface, however, the redox depletions are not light enough to pass for hydric soils. A value of 5 or more and chroma of 2 or less is need to make this soil indicator. If current conditions persist, soils may become hydric in the future.

HYDROLOGY

Wetland Hydrology Indicators:

Primary indicators (minimum of one required, check all that apply)		Secondary Indicators (2 or more required)
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Salt Crust (B11)	<input type="checkbox"/> Water Marks (B1) (Riverine)
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Biotic Crust (B12)	<input type="checkbox"/> Sediment Deposits (B2) (Riverine)
<input checked="" type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Aquatic Invertebrates (B13)	<input type="checkbox"/> Drift Deposits (B3) (Riverine)
<input type="checkbox"/> Water Marks (B1) (Nonriverine)	<input type="checkbox"/> Hydrogen Sulfide Odor (C1)	<input type="checkbox"/> Drainage Patterns (B10)
<input type="checkbox"/> Sediment Deposits (B2) (Nonriverine)	<input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3)	<input type="checkbox"/> Dry-Season Water Table (C2)
<input type="checkbox"/> Drift Deposits (B3) (Nonriverine)	<input type="checkbox"/> Presence of Reduced Iron (C4)	<input type="checkbox"/> Crayfish Burrows (C8)
<input type="checkbox"/> Surface Soil Cracks (B6)	<input type="checkbox"/> Recent Iron Reduction in Tilled Soil (C6)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)	<input type="checkbox"/> Thin Muck Surface (C7)	<input type="checkbox"/> Shallow Aquitard (D3)
<input checked="" type="checkbox"/> Water-Stained Leaves (B9)	<input type="checkbox"/> Other (Explain in Remarks)	<input type="checkbox"/> FAC-Neutral Test (D5)

Field Observations:

Surface Water Present? Yes No Depth (inches): _____
 Water Table Present? Yes No Depth (inches): _____
 Saturation Present? Yes No Depth (inches): _____
 (includes capillary fringe)

Wetland Hydrology Present? Yes No

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: Appears to be water run-off from housing area. Broken sprinkler may contribute to water source. Area above broken sprinkler downslope from the concrete culvert is wet. It is not known if the sprinkler system is in use.

Project/Site: Military Family Housing Area Commissary City/County: Coleville - Mono County Sampling Date: September 24, 2009
 Applicant/Owner: Marine Corps Mountain Warfare Training Center, Lincoln Housing Area State: CA Sampling Point: 1B
 Investigator(s): Robin Kimmont Section, Township, Range: _____
 Landform (hillslope, terrace, etc.): Hillslope Local relief (concave, convex, none): None Slope (%): 5
 Subregion (LRR): D - Interior Deserts Lat: 38 35'14.150 N Long: 119 30'56 71B W Datum: UTM Zone 11N
 Soil Map Unit Name: Holbrook Cobble Loamy Sand Series NW1 classification: _____
 Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No _____ (If no, explain in Remarks)
 Are Vegetation N, Soil Y, or Hydrology N significantly disturbed? Are "Normal Circumstances" present? Yes _____ No X
 Are Vegetation N, Soil N, or Hydrology N naturally problematic (If needed, explain any answers in Remarks)

SUMMARY OF FINDINGS - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes _____ No <u>X</u>	Is the Sampled Area within a wetland? Yes _____ No <u>X</u>
Hydric Soil Present?	Yes _____ No <u>X</u>	
Wetland Hydrology Present?	Yes _____ No <u>X</u>	
Remarks:	Area appears to be previously disturbed from grading of the housing pads.	

VEGETATION -- Use scientific names of plants.

Tree Stratum	Plot Size	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet:
1 None					Number of Dominant Species That are OBL, FACW, or FAC: <u>0</u> (A) Total Number of Dominant Species Across All Strata: <u>4</u> (B)
2					
3					
4					
Total Cover: _____					
Sampling/Shrub Stratum Plot Size: <u>5m</u>					
1 <i>Artemisia tridentata</i>		<u>12</u>	<u>Y</u>	<u>UPL</u>	Percent of Dominant Species That are OBL, FACW, or FAC: <u>0.00</u> (A/B) (must be >0.5)
2 <i>Chrysothamnus nauseosus</i>		<u>25</u>	<u>Y</u>	<u>UPL</u>	
3					
4					
Total Cover: <u>37</u>					
Herb Stratum Plot Size: <u>2m</u>					
1 <i>Sisymbrium altissium</i>		<u>10</u>	<u>Y</u>	<u>UPL</u>	Prevalence Index worksheet (test when Hydro and Soils indicate wetlands) Total % Cover (absolute) of Multiply by OBL species <u>0</u> x 1 = <u>0</u> FACW species <u>0</u> x 2 = <u>0</u> FAC species <u>0</u> x 3 = <u>0</u> FACU species <u>5</u> x 4 = <u>20</u> UPL species <u>47</u> x 5 = <u>235</u> Column Totals: <u>52</u> (A) <u>255</u> (B) Prevalence Index = B/A = <u>4.903846</u> (must be ≤3.0)
2 <i>Salsola kal</i>		<u>5</u>	<u>Y</u>	<u>FACU*</u>	
3					
4					
5					
6					
7					
8					
Total Cover: <u>15</u>					
Woody Vine Stratum Plot Size: _____					
1 None					Hydrophytic vegetation indicators _____ Dominance test is >50% _____ Prevalence index is ≤ 3.0 ¹ _____ Morphological adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) _____ Problematic Hydrophytic Vegetation ¹ (Explain)
2					
Total Cover: _____					
% Bare ground in Herb Stratum <u>75</u> % Cover of Biotic Crust <u>0</u>					
Hydrophytic Vegetation Present? Yes _____ No <u>040173</u>					
Remarks:					

SOIL

Sampling point: 1B

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-13	10YR 3/3	100					Silty Sand	Rock/Gravel, Roots

¹Type: C=Concretion, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. ²Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- | | | |
|--|---|---|
| <input type="checkbox"/> Histosol (A1) | <input type="checkbox"/> Sandy Redox (S5) | <input type="checkbox"/> Indicators for Problematic Hydric Soils: ³ |
| <input type="checkbox"/> Histic Epipedon (A2) | <input type="checkbox"/> Stripped Matrix (S6) | <input type="checkbox"/> 1 cm Muck (A9) (LRR C) |
| <input type="checkbox"/> Black Histic (A3) | <input type="checkbox"/> Loamy Mucky Mineral (F1) | <input type="checkbox"/> 2 cm Muck (A 10) (LRR B) |
| <input type="checkbox"/> Hydrogen Sulfide (A4) | <input type="checkbox"/> Loamy Gleyed Matrix (F2) | <input type="checkbox"/> Reduced Vertic (F18) |
| <input type="checkbox"/> Stratified Layers (A5) (LRR C) | <input type="checkbox"/> Depleted Matrix (F3) | <input type="checkbox"/> Red Parent Material (TF2) |
| <input type="checkbox"/> 1 cm Muck (A9) (LRR D) | <input type="checkbox"/> Redox Dark Surface (F6) | <input type="checkbox"/> Other (Explain in Remarks) |
| <input type="checkbox"/> Depleted Below Dark Surface (A11) | <input type="checkbox"/> Depleted Dark Surface (F7) | |
| <input type="checkbox"/> Thick Dark Surface (A12) | <input type="checkbox"/> Redox Depressions (F8) | |
| <input type="checkbox"/> Sandy Mucky Mineral (S1) | <input type="checkbox"/> Vernal Pool (F9) | ³ Indicators of hydrophytic vegetation and wetland hydrology must be present |
| <input type="checkbox"/> Sandy Gleyed Matrix (S4) | | |

Restrictive Layer (if present):

Type: Rock
 Depth (inches): 13

Hydric Soil Present? Yes No

Remarks: Very rocky, appears to be old grading spoil from house pads. Includes small and large gravel.

HYDROLOGY

Wetland Hydrology Indicators:

- | | | |
|---|--|--|
| Primary indicators (minimum of one required; check all that apply) | | Secondary Indicators (2 or more required) |
| <input type="checkbox"/> Surface Water (A1) | <input type="checkbox"/> Salt Crust (B11) | <input type="checkbox"/> Water Marks (B1) (Riverine) |
| <input type="checkbox"/> High Water Table (A2) | <input type="checkbox"/> Biotic Crust (B12) | <input type="checkbox"/> Sediment Deposits (B2) (Riverine) |
| <input type="checkbox"/> Saturation (A3) | <input type="checkbox"/> Aquatic Invertebrates (B13) | <input type="checkbox"/> Drift Deposits (B3) (Riverine) |
| <input type="checkbox"/> Water Marks (B1) (Nonriverine) | <input type="checkbox"/> Hydrogen Sulfide Odor (C1) | <input type="checkbox"/> Drainage Patterns (B10) |
| <input type="checkbox"/> Sediment Deposits (B2) (Nonriverine) | <input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3) | <input type="checkbox"/> Dry-Season Water Table (C2) |
| <input type="checkbox"/> Drift Deposits (B3) (Nonriverine) | <input type="checkbox"/> Presence of Reduced Iron (C4) | <input type="checkbox"/> Crayfish Burrows (C8) |
| <input type="checkbox"/> Surface Soil Cracks (B6) | <input type="checkbox"/> Recent Iron Reduction in Tilled Soil (C6) | <input type="checkbox"/> Saturation Visible on Aerial Imagery (C9) |
| <input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) | <input type="checkbox"/> Thin Muck Surface (C7) | <input type="checkbox"/> Shallow Aquitard (D3) |
| <input type="checkbox"/> Water-Stained Leaves (B9) | <input type="checkbox"/> Other (Explain in Remarks) | <input type="checkbox"/> FAC-Neutral Test (D5) |

Field Observations:

Surface Water Present? Yes No Depth (inches): _____
 Water Table Present? Yes No Depth (inches): _____
 Saturation Present? Yes No Depth (inches): _____
 (includes capillary fringe)

Wetland Hydrology Present? Yes No

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

040174

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040175

040180

ENCLOSURE 4

040176



PO Box 10007
113 Dreger Ave SE
Huntsville, Alabama 35801
Telephone: 256-261-1317
www.apexcos.com

February 4, 2011

Mr. Rob Tucker
Water Resources Control Engineer
Lahontan Region
Region Water Quality Control Board
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150

VIA EMAIL

Subject: Comments to the Tentative Waste Discharge Requirements
Tentative Board Order R6T-2011-(TENTATIVE)
Marine Corps Coleville, California Housing Center (WDID 6A268512900)

Dear Mr. Tucker:

The purpose of this letter is to provide comments to the Tentative Waste Discharge Requirements as established in the Tentative Board Order R6T-2011-(TENTATIVE) as issued by the California Regional Water Quality Control Board (CRWQCB), Lahontan Region, January 21, 2011. The comments as follows:

***Item 3** The Discharger filed a Report of Waste Discharge dated July 2010 to upgrade the wastewater facilities to allow for the existing flows and to accommodate new flows from a child development center, a small shopping center, and four existing unoccupied homes (currently used as the child development center). The child development center and shopping center (a grocery store and a small retail store) will contribute to the total wastewater flow.*

Comment: This is the first time throughout the permitting and design process we have encountered the term "shopping center." This is not a term of art used by the Navy, NavFAC, USMC, Lincoln or Hunt and this term is not used in the CEQA document. The term shopping center is then immediately defined as a grocery store and small retail store. It seems that the term "shopping center" is inconsistent with previous documentation and is significantly more likely to upset neighbors who are already against this project, resulting in a potential unnecessary excuse to challenge the WDR or the CEQA determination. Please use the Commissary and Mini Mart terms as used by the Navy.

Please incorporate this change into **Item 19B** also.

Item 3. *There are also indications- the existing system is approaching its capacity and needs upgrading (nitrate concentrations appear to be rising in the ground water). Therefore, the Discharger has proposed a new Facility to increase the treatment capabilities to discharge up to 50,000 gallons per day by improving the quality of the discharge and increasing the wastewater disposal area.*

Comment: This paragraph suggests, in writing and for public review, that the system is an existing cause of groundwater pollution. We disagree that the data supports this conclusion as Nitrate levels have not risen over the past several years. As demonstrated by the following table, which presents Nitrate concentrations in DMW-1 from 2004 through 2010, the data shows a significantly significant seasonal variance, but no consistent increase since 2004.

Nitrate Concentrations Recorded in DMW-1					
Year	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter	Average
2004	N/A	2.7	0.1	4.2	2.3
2005	1.5	2.7	1.2	3.4	2.2
2006	5	2.1	2.6	2.6	3.1
2007	4.3	1.5	1.2	1.7	2.2
2008	0.05	1.4	2.9	4.8	2.3
2009	2.4	2.7	3	1.7	2.5
2010	5	1.7	1.2	4.6	3.1
Average:	3.0	2.1	1.7	3.3	2.5

Because the sampling data does not support this hypothesis, we object to the inclusion of the parenthetical statement "(nitrate concentrations appear to be rising in the ground water)."

Please incorporate this change into **Item 19B** also.

Item 5. *The proposed Facility's disposal areas will consist of existing leachfield (called the low-pressure disposal area), a below-grade infiltration chamber (the Discharger's Report of Waste Discharge nomenclature or term for this portion of the proposed Facility*

040178
 2/10/11

was "below-grade infiltration basin"), and subsurface irrigation areas located above the low-pressure disposal area and above the below-grade infiltration chamber.

Comment: This statement regarding the "existing leachfield" is repeated elsewhere in the WDR. Although the design includes re-using the location of the current leach field, the plan clearly shows replacing the existing leachfield with a new dual-discharge system incorporating both subsurface irrigation as well as infiltration. Therefore, references that suggest the design and permit plans to "reuse" the existing leachfield is somewhat misleading.

Please incorporate this change into **Item 16** also.

Item 5. *The liner will be fully buried. The pipes will be buried in drain rock and then covered with filter fabric and topsoil. Located above the infiltration basin and the existing leach field will be subsurface irrigation areas installed in the topsoil 12-18 inches below grade.*

Comment: Please change "top soil" to "soil" as we have not specified topsoil grade material to be placed in this zone.

Item 7. *There are three ground water wells that provide drinking water and well number 5 has concentrations of arsenic that must be treated to meeting the drinking water standards.*

Comment. All three wells require treatment for arsenic not just #5. Well 5 has a higher arsenic concentration than the wells #1 and #4 so a new well is being drilled to attempt to reduce the number of required media change outs.

Item 7. *The rinsing process produces an estimated total of 60,000 to 70,000 gallons of rinse water when new media is installed in both filters. The installation of new filter media has occurred less than once every 9 to 12 months in the past.*

Comment. Please delete "in both filters" as typically only one of the filters is changed out at a time and additional rinse water may be used to ensure clean drinking water. Delete "less than once every 9 to 12 months" and replace with "4 to 6 times every 12 months."

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Item 7 (267,000 cubic feet)

Comment: The correct volume of the storm water basin both pre- and post modification is approximately 237,000 gallons. This is the volume presented in the storm water letter dated September 30, 2010.

Item 7 Rinse water may also be dispersed by way of infiltration systems for the proposed Facility, at the Discharger's discretion, without going through the Facility treatment processes.

Comment: The proposed design does not account for this discharge. If we can dam the concrete swale or make future modifications we can take advantage of this option.

Item 9 The proposed Facility construction is planned to begin as early as March 2011 and the current plan is to complete the upgrades by October 2011.

Comment: Please change the completion date to 2012 since the leachfield construction will not start until the plant is up and running properly. Sop the leachfield construction will likely be completed during the summer of 2012.

Item 11. The storm water retention basin will be altered in configuration with construction of the proposed Facility, but the overall capacity to handle runoff from a 100 year, 24 hour storm event will not be altered.

Comment: Please change "to handle runoff from a 100 year" to "to handle on-site or developed area run off from a 100 year." The basin has been designed to contain an onsite 100 year 24 hour storm event only. The basin has been designed not to be damaged by a 100 year 24 hr storm for both onsite and offsite flows.

Item 12. The Facility currently has four active drinking water wells on the site located upgradient of the disposal areas.

Comment: The Facility has three active drinking water wells. Five total but two are not to be used. Well #5 would be considered to be cross gradient or down gradient form the disposal areas.

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Item 18. *The current discharge has an average biochemical oxygen demand (BOD) concentration of 250 mg/l.*

Comment: Please change to average concentration of 262 mg/l. See attached calculations.

Item I.B. *The maximum flow to the equalization tank must not exceed 60,000 gallons in a single 24-hour period.*

Comment: The current design does not have any way to monitor flow into the equalization chamber. Additionally, due to the presence of solids into this tank accurately monitoring flow is difficult at best. We request that this limitation be removed from the WRDs. In my November 17, 2010 response I indicated that flow would be monitored after the sand filters where an accurate flow meter can be employed.

Please incorporate this change into **Item II, A, 1** also.

Additionally 60,000 gpd is not appropriate for an inflow or discharge limit. If we capture and monitor the media rinse water then the flow would be significantly higher than a 60,000 gpd maximum. Previous correspondence stated "5. I am also considering putting in a Maximum one-hour flow of 125,000 gpd as in you report of waste discharger. Concerns?" We agreed with the maximum flow up to 125,000 gpd, pursuant to your November, 11, 2010 email/letter. Or a maximum 1-hour flow of 5,280 gallons per hour for a 24-hour period. We need a flexible maximum discharge flow so that we can empty the equalization tank for planned maintenance. We suggest a minimum 90,000 gpd maximum so we can discharge water at a faster rate if needed to empty the equalization tank to prepare for maintenance.

Item VB3 *Rinse water must be treated by appropriate control measures prior to discharge into the Basin.*

Comment: "Appropriate control measures" is too vague of language and has no regulatory standard or definition. Items VB1, VB2, VB4 and VB5 are specific and appear to sufficiently describe controls anticipated for the rinse water. We request deletion of Item VB3 or definition of what the board means by "appropriate control measures."

040181

040171

Mr. Rob Tucker
Lahontan Region, Regional Water Quality Control Board
Response to Report of Waste Discharge Requirements

Please do not hesitate to call me on my office phone at 256-261-1317 if you have any questions or require additional information.

Sincerely,
Apex Companies, LLC



Scott S. Huisman, Director
California PE # 51574

Attachments: Average BOD Calculations.

Cc Scott Belknap, Hunt Building Company
Nathan Owen, Hunt Building Company
Dane Baker, Camp Pendleton Quantico Housing
Joe Weslock, Apex

040182

Tentative Waste Discharge Requirements
Tentative Board Order R6T-2011-(TENTATIVE)

Average BOD
280 PPM
260 PPM
260 PPM
250 PPM
250 PPM
270 PPM
261.7 PPM

040183

040183

ENCLOSURE 5

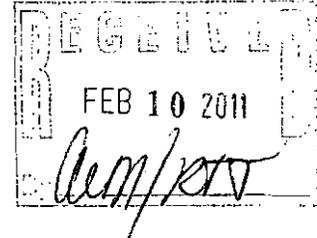
040184

TIMOTHY W. PEMBERTON
P.O. Box 485 Markleeville, CA 96120

ATTORNEY AT LAW
Ph. (530) 694-2490 Fax (530) 694-2323

February 8, 2011

Robert Tucker
Water Resources Control Engineer
Lahontan Region, Water Quality Control Board
2501 Lake Tahoe Blvd.
South Lake Tahoe, CA 96150
VIA FAX (530) 544-2271



Re: Waste Discharge Requirement for the MWYC Coleville Housing Disposal Facility
WDED 6A268512900

Dear Mr. Tucker:

This office represents James and Judy Coffron. They own approximately 145 acres immediately East (and down gradient) of the above-referenced disposal facility. There are two domestic water supply wells on the property. Please note the following:

1. The 11/29/90 correspondence from Diana Henrioule-Henry to the Coffrons stated "we are aware that the Mountain Warfare Training Center Housing Project's leach fields may pose a threat to area groundwater". She also indicated the monitoring program would be expanded in conjunction with the housing expansion. Apparently, this correspondence was in response to tests of groundwater wells on the Coffron property which are down gradient from the housing facility/leach fields. There are three groundwater wells on the Coffron property which serve six residences;
2. In approximately May, 1994, the Board adopted a monitoring and reporting program for the housing project. That program required that groundwater samples be taken from each of the three groundwater monitoring wells at the housing facility on a quarterly basis for nitrate nitrogen, chloride, BOD and Total Dissolved Solids. The program also required the depth to ground water be measured and recorded each time a monitoring well was sampled. The Board's 4/7/94 correspondence to Colonel Schumacher states that no sampling results had been received since the date of installation of the monitoring wells in 1993;
3. Tests of the groundwater wells at the Coffron property in 1997 detected coliform;

040185

4. On 7/27/99, Mr. Coffron wrote the Board as a follow up to a 7/15/99 conversation with Ms. Henriouille-Henry in which she agreed to send Mr. Coffron all data related to the testing of the monitoring wells (and the Coffron wells). The data was not forthcoming;
5. On 8/18/99, this Board sent correspondence to the Mountain Warfare Training Center which, among other things, stated that samples from the monitoring wells (and the Coffron wells) were negative for coliform, but that the other constituents (probably nitrate nitrogen, BOD, chlorides and Total Dissolved Solids) were present. The letter also requested split samples from the monitoring wells. It also stated that the housing facility had not been reporting depth to groundwater (as required by the monitoring program). That means no depth to groundwater data had been provided since 1993;
6. On 7/7/10, Mr. Coffron wrote to the Navy that the existing wastewater system at the housing facility overflows in an easterly direction through a culvert under Hwy 395 and onto the Coffron property. The Navy did not respond;
7. Mr. Coffron has observed fluids released from the effluent pond being conveyed through the culvert and reaching his property where it enters the so-called "Alkali Ditch" which is used to convey surface irrigation water on lands adjacent to the West Walker River;
8. The proposed Waste Discharge Requirements/Board Order No. R6T-2011 states the following:

- a. The existing flow with the additional flow will result in an amount of discharge that would exceed standards for disposal from septic systems (daily flow should be less than 34,250 gpd [p. 3] while the proposed flow should not be greater than 50,000 gallons per day on a monthly average computed on daily flow volumes [p. 11]). The present discharge requirement is no more than 39,000 gpd per day (p. 11);
- b. There are indications nitrate concentrations appear to be rising in the groundwater (p.3). Finding 19(b) states groundwater monitoring at the facility has shown minor increases in nitrate concentrations in the groundwater "possibly attributable to the facility" (p. 8-9). Finding 18 states the current discharge has an average BOD concentration of 250 mg/L and an average TSS concentration of 58 mg/L (p. 8). The effluent sampled in March and April, 2010 was found to have an average ammonia concentration of over 58 mg/L which, in the air rich subsurface, would quickly convert to nitrate (p.9). The proposed limit for BOD is 30 mg/L mean and 45 mg/L maximum, which means the present discharge is over 5 times the proposed maximum. The present monitoring/discharge threshold for TSS is 10 mg/L, which means the present TSS is nearly 6 times the threshold. The monitoring/discharge threshold for nitrate as nitrogen (as well as total nitrogen) is .1 mg/L, which means the present

ammonia concentration is far in excess of the threshold. Nevertheless, finding No. 17(2) states the discharge is in compliance with the applicable Water Quality Control Plan and the Monitoring Program and the associated data indicates the facility has not impaired water quality for designated beneficial uses (p. 7);

- c. The existing leach field will continue to be part of the facility's disposal areas (p. 2). The percolation rate of existing leach field is approx. 3.3 inches per day (p. 4). A below grade infiltration chamber is a new disposal area (p. 2-3). The percolation rates in the new subsurface area are much higher, for example a percolation rate of 55 inches per day (p. 4-5). For design purposes, the discharger used a percolation rate of 3.3 inches per day (p. 5);
- d. The groundwater flow is generally toward the West Walker River. The ground water in the three monitoring wells typically occurs over 30 feet below the land surface. The groundwater beneath the bottom of the infiltration is also expected to be 30 feet below grade, but is not specifically known (p. 5);
- e. Finding 19(c) states the ground water is assumed to be generally unaffected by waste discharges "due to the isolated and remote location" (p. 9). It goes on to say that "all factors that could affect water quality in the area are being controlled in accordance with the Basin Plan procedures;

- 9. These conclusions are inconsistent with the (limited) details recited in the proposed Waste Discharge Requirements. The findings that the discharge is in compliance with the applicable Water Quality Control Plan (Basin Plan) is clearly not supported by the facts recited in the proposal. In order to understand the present discharge, please provide copies of the quarterly monitoring reports since the date they were first taken/provided (including the depth to groundwater data). This request is made pursuant to California Government Code Section 6250 et seq. Please advise regarding the cost of copying this data and I will forward payment immediately;
- 10. The finding that all factors that could affect the area are being controlled in accordance with the Basin Plan is inconsistent with the information contained in the proposal (or there is admittedly no data available). The proposal admits the depth to groundwater under the proposed subsurface area is assumed to be 30 feet, but is unknown. The proposal states groundwater is "assumed" to be generally affected. Such an assumption is inconsistent with the data in the report. Since the new subsurface disposal area percolates at a rate of up to 55 inches per day, it seems the discharge will reach groundwater. Also, there is no explanation of why the Board apparently is accepting the Discharger's design percolation rate of 3.3 inches per day when there appears to be empirical information the

rate is actually many times higher. If the percolation rate is 55 inches per day, and assuming depth to ground water is thirty feet, it is inevitable the effluent will reach groundwater. Please provide percolation rates for the existing and proposed facilities, pursuant to Government Code Section 6250, et seq. In the event you have any data regarding the constituents of the groundwater under or about the facility, please provide it. Also, the finding that groundwater is assumed to be unaffected by waste discharges due to the isolated and remote location is erroneous. There are at least three groundwater wells adjacent to the facility;

11. In short, it seems there have been violations of the discharge requirements that the Board has failed to act on. Apparently, the Board's remedy is to allow an even greater volume of discharges, but of a higher quality effluent. However, the inadequacy of the additional disposal field (and the high groundwater) likely will result in the effluent reaching groundwater;

12. I will send a supplemental comment after receiving the monitoring data.

Very Truly Yours,


Timothy W. Pemberton

040188

ENCLOSURE 6

040189

Robertson & Benevento

ATTORNEYS AND COUNSELORS AT LAW

G. DAVID ROBERTSON (NV. & CA.)
SAM BENEVENTO (NV., CA. & AZ.)
KIRK C. JOHNSON (NV., AZ. & CO.)
JARRAD C. MILLER (NV. & CA.)

RICHARD D. WILLIAMSON (NV. & CA.)
MARTIN R. PRYBYLSKI (NV.)
JONATHAN J. TEW (NV. & IL.)

BANK OF AMERICA PLAZA
50 W. LIBERTY ST. SUITE 600
RENO, NEVADA 89501
TELEPHONE: (775) 329-5600
FACSIMILE: (775) 348-8300
www.NVLawyers.com

LAS VEGAS OFFICE:
1945 EAST WARM SPRINGS RD
LAS VEGAS, NEVADA 89118
TELEPHONE: (702) 433-2000
FACSIMILE: (702) 268-8139

Reply to: Reno Office

February 22, 2011

VIA FACSIMILE

Robert Tucker

Water Resources Control Engineer

California Regional Water Quality Control Board, Lahontan Region

2501 Lake Tahoe Blvd.

South Lake Tahoe, CA 96150

(f) (530) 544-2271

Re: *COMMENTS ON THE TENTATIVE ORDER FOR THE REVISED WASTE DISCHARGE REQUIREMENTS FOR THE MOUNTAIN WARFARE TRAINING CENTER (MWTC), COLEVILLE HOUSING WASTEWATER TREATMENT AND DISPOSAL FACILITY (WDID: 6A268512900)*

Dear Mr. Tucker:

We represent various individuals and entities associated with the Schwake Family ("Schwakes"). The Schwakes own property to the Northwest and East of the U.S. Marine Corps Mountain Warfare Training Center Housing Project ("Housing Project").

We are in receipt of your January 21, 2011, correspondence and enclosures requesting comments on Tentative Board Order R6T-2011 (the "Tentative Board Order") allowing Camp Pendleton and Quantico Housing LLC/Lincoln Military Housing to make changes to the current wastewater treatment system and discharge wastewater at a higher rate.

Please be advised that we DO NOT concur with the Tentative Board Order and the Revised Waste Discharge Requirements, to which we object on the following bases:

- (1) The Board Order and Revised Waste Discharge Requirements will adversely affect the Schwakes' personal and property rights;
- (2) The projected wastewater discharge and flows are inaccurate. Specifically, "Attachment 'D'" (Exhibit "1" attached hereto) represents that the Alkali Ditch flows from the Northwest to the Southeast into the West Walker River. In fact, the Alkali Ditch flows in the opposite direction, away from the West Walker River, and directly onto our client's property. Thus, the increased wastewater discharge will flow into the Alkali Ditch and proceed northwesterly onto the Schwakes' property adjacent to the Housing Project, which will cause significant and irreparable harm;

040190

Robert Tucker
Water Resources Control Engineer
February 22, 2011
Page 2

- (3) The Alkali Ditch *already* carries problematic wastewater discharge flowing onto the Schwakes' property Northwest of the Housing Project. This is a point of fact which we believe the Water Quality Control Board is well aware of based upon previous complaints lodged with the Board;
- (4) Finally, we join in the comments and objections as set forth in the February 8, 2011, letter from Timothy W. Pemberton (on behalf of James and Judy Coffron), a copy of which is attached to this letter as Exhibit "2".

We look forward to attending all public meetings and hearings on this matter. Please ensure that we are timely noticed regarding same.

Sincerely,

ROBERTSON & BENEVENTO



G. David Robertson, Esq.

GDR:jjt

Cc: Clients (via email)
Timothy W. Pemberton

040191

EXHIBIT "1"

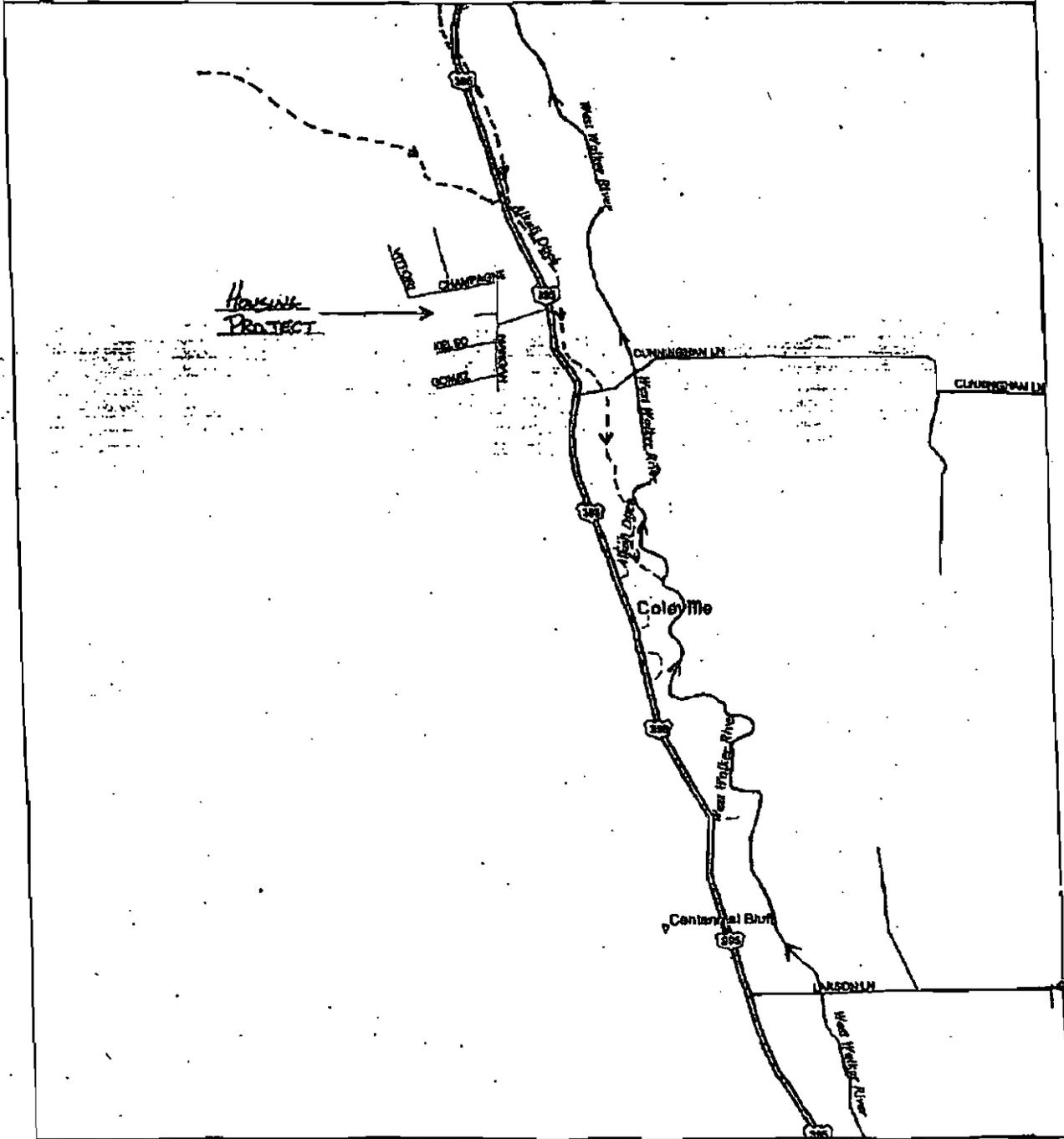
EXHIBIT "1"

040192

SEARCHED
SERIALIZED
INDEXED
FILED

Attachment "D" Vicinity Map

U.S. Marine Corps Mountain Warfare
Training Center Housing Project



040193

EXHIBIT "2"

EXHIBIT "2"

040194

TIMOTHY W. PEMBERTON
P.O. Box 485 Markleeville, CA 96120

ATTORNEY AT LAW
Ph. (530) 694-2490 Fax (530) 694-2325

February 8, 2011

Robert Tucker
Water Resources Control Engineer
Lahontan Region, Water Quality Control Board
2501 Lake Tahoe Blvd.
South Lake Tahoe, CA 96150
FIA FAX (530) 544-2271

Re: Waste Discharge Requirement for the MWYC Coleville Housing Disposal Facility
WDED 6A268512900

Dear Mr. Tucker:

This office represents James and Judy Coffron. They own approximately 145 acres immediately East (and down gradient) of the above-referenced disposal facility. There are two domestic water supply wells on the property. Please note the following:

1. The 11/29/90 correspondence from Diana Henrioule-Henry to the Coffrons stated "we are aware that the Mountain Warfare Training Center Housing Project's leach fields may pose a threat to area groundwater". She also indicated the monitoring program would be expanded in conjunction with the housing expansion. Apparently, this correspondence was in response to tests of groundwater wells on the Coffron property which are down gradient from the housing facility/leach fields. There are three groundwater wells on the Coffron property which serve six residences:
2. In approximately May, 1994, the Board adopted a monitoring and reporting program for the housing project. That program required that groundwater samples be taken from each of the three groundwater monitoring wells at the housing facility on a quarterly basis for nitrate nitrogen, chloride, BOD and Total Dissolved Solids. The program also required the depth to ground water be measured and recorded each time a monitoring well was sampled. The Board's 4/7/94 correspondence to Colonel Schumacher states that no sampling results had been received since the date of installation of the monitoring wells in 1993:
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4. On 7/27/99, Mr. Coffron wrote the Board as a follow up to a 7/15/99 conversation with Ms. Henriouille-Henry in which she agreed to send Mr. Coffron all data related to the testing of the monitoring wells (and the Coffron wells). The data was not forthcoming;
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8. The proposed Waste Discharge Requirements/Board Order No. R6T-2011 states the following:
 - a. The existing flow with the additional flow will result in an amount of discharge that would exceed standards for disposal from septic systems (daily flow should be less than 34,250 gpd [p. 3] while the proposed flow should not be greater than 50,000 gallons per day on a monthly average computed on daily flow volumes [p. 11]). The present discharge requirement is no more than 39,000 gpd per day (p. 11);
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ammonia concentration is far in excess of the threshold. Nevertheless, finding No. 17(2) states the discharge is in compliance with the applicable Water Quality Control Plan and the Monitoring Program and the associated data indicates the facility has not impaired water quality for designated beneficial uses (p. 7):

- c. The existing leach field will continue to be part of the facility's disposal areas (p. 2). The percolation rate of existing leach field is approx. 3.3 inches per day (p. 4). A below grade infiltration chamber is a new disposal area (p. 2-3). The percolation rates in the new subsurface area are much higher, for example a percolation rate of 55 inches per day (p. 4-5). For design purposes, the discharger used a percolation rate of 3.3 inches per day (p. 5);
- d. The groundwater flow is generally toward the West Walker River. The ground water in the three monitoring wells typically occurs over 30 feet below the land surface. The groundwater beneath the bottom of the infiltration is also expected to be 30 feet below grade, but is not specifically known (p. 5);
- e. Finding 19(c) states the ground water is assumed to be generally unaffected by waste discharges "due to the isolated and remote location" (p. 9). It goes on to say that "all factors that could affect water quality in the area are being controlled in accordance with the Basin Plan procedures;

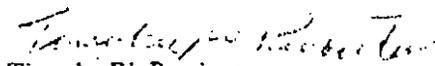
- 9. These conclusions are inconsistent with the (limited) details recited in the proposed Waste Discharge Requirements. The findings that the discharge is in compliance with the applicable Water Quality Control Plan (Basin Plan) is clearly not supported by the facts recited in the proposal. In order to understand the present discharge, please provide copies of the quarterly monitoring reports since the date they were first taken/provided (including the depth to groundwater data). This request is made pursuant to California Government Code Section 6250 et seq. Please advise regarding the cost of copying this data and I will forward payment immediately;
- 10. The finding that all factors that could affect the area are being controlled in accordance with the Basin Plan is inconsistent with the information contained in the proposal (or there is admittedly no data available). The proposal admits the depth to groundwater under the proposed subsurface area is assumed to be 30 feet, but is unknown. The proposal states groundwater is "assumed" to be generally affected. Such an assumption is inconsistent with the data in the report. Since the new subsurface disposal area percolates at a rate of up to 55 inches per day, it seems the discharge will reach groundwater. Also, there is no explanation of why the Board apparently is accepting the Discharger's design percolation rate of 3.3 inches per day when there appears to be empirical information the

rate is actually many times higher. If the percolation rate is 55 inches per day, and assuming depth to ground water is thirty feet, it is inevitable the effluent will reach groundwater. Please provide percolation rates for the existing and proposed facilities, pursuant to Government Code Section 6250, et seq. In the event you have any data regarding the constituents of the groundwater under or about the facility, please provide it. Also, the finding that groundwater is assumed to be unaffected by waste discharges due to the isolated and remote location is erroneous. There are at least three groundwater wells adjacent to the facility;

11. In short, it seems there have been violations of the discharge requirements that the Board has failed to act on. Apparently, the Board's remedy is to allow an even greater volume of discharges, but of a higher quality effluent. However, the inadequacy of the additional disposal field (and the high groundwater) likely will result in the effluent reaching groundwater;

12. I will send a supplemental comment after receiving the monitoring data.

Very Truly Yours,


Timothy W. Pemberton

040198

ENCLOSURE 7

040199

TIMOTHY W. PEMBERTON
P.O. Box 485 Markleeville, CA 96120

ATTORNEY AT LAW
Ph. (530) 694-2490 Fax (530) 694-2325

March 11, 2011

Robert Tucker
Water Resources Control Engineer
Lahontan Region, Water Quality Control Board
2501 Lake Tahoe Blvd.
South Lake Tahoe, CA 96150
VIA FAX (530) 544-2271

Re: Waste Discharge Requirement for the MWYC Coleville Housing Disposal Facility
WDED 6A268512900

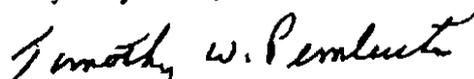
Dear Mr. Tucker:

This is a follow-up to my 2/8/11 correspondence (to which you have not responded except to indicate the voluminous project file was available for review). Please advise regarding the following:

1. If tests for coliform have been conducted on any of the monitoring wells, please indicate the results;
2. What is the depth of each of the monitoring wells?
3. What is the depth to groundwater beneath the bottom of the infiltration system?
4. The proposed Order will also regulate waste from the drinking water treatment system. Please advise whether the present Order does so. If it does, please advise regarding the mode of disposal of waste from that system (including any records showing past disposal). The proposed Order should be revised to explicitly state the mode of disposal of the waste from the system, including the keeping of records related to the disposal.

Your anticipated cooperation is appreciated.

Very Truly Yours,


Timothy W. Pemberton

040200

ENCLOSURE 8

040201



California Regional Water Quality Control Board
Lahontan Region



Linda S. Adams
Acting Secretary for
Environmental Protection

2501 Lake Tahoe Boulevard, South Lake Tahoe, California 96150
(530) 542-5400 • Fax (530) 544-2271
www.waterboards.ca.gov/lahontan

Edmund G. Brown Jr.
Governor

March 18, 2011

Timothy W. Pemberton
P.O. Box 485
Markleeville, CA 96120

**RESPONSE TO COMMENTS ON TENTATIVE WASTE DISCHARGE
REQUIREMENTS, MOUNTAIN WARFARE TRAINING CENTER COLEVILLE
HOUSING WASTEWATER TREATMENT AND DISPOSAL FACILITY, MONO
COUNTY (WDID 6A268512900)**

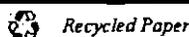
The California Regional Water Quality Control Board, Lahontan Region (Water Board) staff reviewed your letters dated February 8, 2011, and March 1, 2011, on the waste discharge requirements (WDRs) for Coleville Housing Wastewater Treatment Facility (Facility). The Facility is owned and operated by Camp Pendleton & Quantico Housing LLC/Lincoln Military Housing (Lincoln). This letter is in response to the comments in your letters. We have used the numbering from your first letter to address the comments; however, some comments had several issues to address, so in a few instances below we attempted to paraphrase what we believe are the issues you've identified. We have included answers to questions in your second letter dated March 1, 2011, also. (We have put in parentheses the numbers that correspond to questions from your second letter.)

Response to Comments

1. The comments are noted. Our responses below address the comments.
 - a. The November 29, 1990, letter to your client from Water Board staff (Diana Henrioulle-Henry) did state the "... housing project's leachfields may pose a threat to area ground water." However, the letter did not indicate that threat was in response to ground water testing. The letter further stated that if your client had concerns with the quality of his drinking water that he should test his wells. Additionally, she stated that we would like to be notified if any suspected wastewater constituents were found in those wells.
 - b. The November 29, 1990, letter states that if the Facility expanded, the monitoring program would be expanded to monitor the ground water or vadose zone. During the 1990s the Facility did expand and three ground water monitoring wells were installed, as required by the Water Board. Since Lincoln was notified that they were required to collect samples from the monitoring wells, the data has been consistently collected since 2004.

040202

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- c. We have not found any information on testing of the Coffron's drinking water wells in our file.
2. The comment provides historical information and does not pose any questions. The Facility has installed monitoring wells on-site from which ground water samples have been routinely collected since 2004. However, the current Monitoring and Reporting Program (MRP) from 2001 does not require testing for biochemical oxygen demand (BOD). We currently require quarterly testing for nitrate as nitrogen, total kjeldahl nitrogen (TKN, chloride and total dissolved solids (TDS). We have proposed to stop testing for TKN, and adding total nitrogen and fecal coliform to quarterly testing requirements. Additionally, we are proposing adding testing at five-year intervals for oil and grease, purgeable organics and heavy metals, as we do at many similar facilities. This additional testing is not in response to any known problem.
 3. We have not found a copy of the positive coliform results on the Coffron's wells cited in comments or information that the results were provided to the Water Board. (Question 1, March 1, 2011 letter) Upon our request, Lincoln collected ground water samples on March 1, 2011, from all three of their Facility ground water monitoring wells to analyze for total coliform, fecal coliform and e-coli bacteria. None of the organisms were detected in the samples collected.
 4. We have consistent monitoring well sampling data from 2004 to present in our files. The sampling information prior to 2004 is sporadic. We have made the information we have available to your office.
 5. The August 18, 1999 letter you cited indicates ground water from Lincoln's wells and from Coffron's wells had a fecal coliform analysis and all samples came back negative. Fecal coliform is associated with wastes from warm blooded animals, including humans.

Also in this comment was a statement asserting the depth to ground water data has not been provided since 1993. That is not correct. Lincoln has submitted ground water data on the site since 2004, after they were notified that it was required. For example in the second quarter of 2009, the depth to ground water was 43.5 feet in DMW-1, 61 feet in DMW-2 and 135.5 feet in DMW-3. (Question 2, March 1, 2011) The total drilled depth of each monitoring well follows: DMW-1, 75 feet; DMW-2, 120 feet; and DMW-3, 170 feet.
 6. We were not aware of Mr. Coffron's July 7, 2010 comments to the Navy until Jan 25, 2011, but Mr. Coffron's address was provided by Lincoln when we requested to contact anyone who has shown any interest on the project for our WDR update mailing list.
 7. On February 23, 2011, Water Board staff inspected with Mr. Coffron the area where he suspected wastewater effluent was being discharged into "Alkali Ditch." The fluid he observed was probably water from the storm water retention basin and the fluid may have been storm water or rinse water from

the drinking water system which requires an initial flushing when granular filter media is changed. The fluid he observed was not sewage. We have included in the proposed permit conditions on the discharge of rinse water that will eliminate any flow of rinse water to the "Alkali Ditch."

8. Comments on the Proposed Waste Discharge Requirements.

- a. When the Marine Corps and Lincoln informed the Water Board that they wished to connect additional facilities to the existing community septic system, we conducted a quick evaluation using our current Water Quality Control Plan for the Lahontan Region (Basin Plan) criteria for the discharge of wastewater from septic tanks to the subsurface. The Basin Plan's criterion of 500 gallons per acre per day is the basis for 34,250 gallons per day. It is not known if the Basin Plan flow limit for septic tank effluent was in effect when the initial waste discharge requirements were written. The flow limit for septic tank effluent does not apply to the proposed treatment system, which will produce high-quality effluent.

We reviewed the current flow records and noted that flow has been greater than the authorized 39,000 gallons on a few days in the last few years. We also are aware the ground water nitrate concentrations in one monitoring well has intermittently reached 5 milligrams per liter (mg/L) as nitrogen. Based on this information, evaluation of the area and its capacity to handle additional discharge was conducted at our request.

Lincoln had an engineering company investigate the treatment and disposal system, and the preliminary findings resulted in the proposal for the new secondary-treated effluent system, with enhanced nitrate removal--the current proposed treatment method.

- b. The comment recites various findings in our tentative Order and presents conclusions that Water Board staff doesn't agree with. Implied concerns are with (i) increasing nitrate concentrations, (ii) current discharge quality with respect to proposed maximum biochemical oxygen demand (BOD) limits, and (iii) the basis for finding that the Facility has not impaired the water quality for designated beneficial uses.
- i. The discussion and findings related to increases in nitrate as nitrogen in the ground water has been changed in the proposed Board Order. To confirm our tentative assertion that nitrate concentrations appear to be rising, we have looked more closely at all of the nitrate data from the monitoring wells from 2004 through 2011. The nitrate as nitrogen data for monitoring wells DW-1 and DW-2 have higher average concentrations and higher maximum concentrations than monitoring well DW-3. This could imply that the discharge from the Facility is increasing the concentrations of nitrate as nitrogen in the ground water to an extent, as might be expected. But other constituents we also looked at (chloride, TKN, TDS) being tested in the ground water do not

support that hypothesis. Thus, we will be changing the finding, but will increase required ground water monitoring.

- ii. The current order has no effluent limits. We requested sampling of the current effluent so we could evaluate current waste loading and, with the proposed new concentrations to be discharged, determine net load reduction for BOD, and total suspended solids (TSS). The effluent limits we are applying in the proposed permit are average and maximum limits for BOD and TSS, which are national technology-based standards for secondary-treated wastewater. These effluent limits will require Lincoln to attain the treatment standards. Lincoln will be held to those technology standards for the discharge once the new treatment system is constructed. The enclosed work sheet is provided to show the [expected?] reduction in net load of BOD and TSS to the ground water in the subsurface.
- iii. We stated in the tentative permit that the concentration of nitrate in ground water appears to be increasing. We will be removing that from the proposed permit and replacing it with a statement that the two wells DMW-1 and DMW-2 have higher values of nitrate in the ground water than monitoring well DMW-3 at certain times or seasonally. However, the nitrate concentration levels, if attributed to wastewater, are not above the drinking water standard (10 mg/L nitrate as nitrogen) for beneficial uses of the ground water. Thus, the discharge is in compliance with the Basin Plan, and the water is suitable for all domestic and agricultural uses.
- c. The existing leach field area will be reused, but the area will be rehabilitated by installation of new piping and landscape irrigation area above the low pressure disposal area, prior to use. Lincoln's engineer proposed to use the original percolation rates to be conservative, even though faster rates were found where another disposal area will be located. The slower rate usage requires additional area upon which to discharge the effluent. The faster rate is in the normal range for the disposal of wastewater from a septic system. Use of the percolation rate for a septic system is appropriate for wastewater effluent treated higher levels to prevent surfacing effluent.
- d. There are three on-site ground water monitoring wells and all the depths to ground water are greater than 30 feet below ground. The Discharger has surveyed the wells to determine ground water elevations and determine the ground water gradient, as will be required quarterly in the proposed Order. (Question 3, March 1, 2011) Based on the ground water depth and surveyed data, the depth to ground water below the low pressure disposal site and subsurface infiltration basin will be 70 ft and 50 ft, respectively. The determined ground water gradient is not what was expected and additional ground water monitoring wells will be required to fully characterize the area ground water hydrology.

040205

- e. The discharge has not impacted ground water quality to the extent that the quality of the ground water to serve beneficial uses has been altered. The Facility will be required to continue to monitor the ground water quality.
9. This letter addresses the cited conclusions and inconsistencies in the tentative WDRs. We have provided our files to your representative and provided copies of certain file materials as requested by your representative.
10. The cited assumption by Water Board staff is that there are no discharges that could affect water quality (other than from the Facility) that are not being controlled in accordance with requirements. If you are aware of a waste discharge that is not being controlled, please provide that information to the Board. Otherwise, staff think the revised findings and comments above address the comment. The use of 3.3 inches per day is the conservative approach for sizing the discharge field; the slower the percolation, the larger the disposal field would need to be to prevent surfacing effluent. We acknowledge the highly-treated discharge will reach ground water, but beneficial uses should not be adversely affected, and ground water monitoring is required to monitor for adverse conditions.

The responses above addressed the comments in the letter of March 11, 2011, except for the very last comment, number 4 of the letter. This comment deals with wastes from the drinking water system. The proposed Order will regulate the discharge from the initial flush of the fine resin material prior to being put into use. The waste must percolate onsite and the other waste (spent resin) from the drinking water treatment system is hauled off for disposal and is not regulated by our proposed Board Order. Since the disposal of the spent resin does not occur within the Lahontan Region we do not regulate its disposal. We are considering requiring records be maintained on the disposal location(s) of spent filter media.

We hope we have provided you and your client with information to better understand at the proposed permit basis and requirements for the Coleville Housing Facility. We assert the proposed upgrades will provide additional safeguards to water quality, and will better protect ground water. If you or your client still have concerns, questions or comments regarding this matter, please contact me at (530) 542-5467 or Alan Miller, Chief, North Basin Regulatory Unit, at (530) 542-5430.



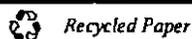
Robert Tucker
Water Resource Control Engineer

Enclosure: Calculation for loading reductions

cc: Mr. James Coffron, Netarts Bay, Oregon
Mr. James Coffron, Topaz, CA

RTT/clhT: Agenda Items/2011/4-April/Coleville housing project/proposed/comment on tentative/coffron rt3-15-2011

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040206

Calculation for load reductions

Conversion of concentration in milligram per liter (mg/l) is the same as parts per million and the follow density of water.

$$\frac{1 \text{ mg}}{1} = \frac{8.327 \times 10^{-6} \text{ lb}}{\text{gal}}$$

Load Calculations, example at 39,000 gallons a day (Old/current flow)

$$262 \text{ mg} \cancel{/1} \times \left(\frac{8.327 \times 10^{-6} \text{ lbBOD}}{\text{gal}} \right) \times \left(\frac{39000 \text{ gal}}{\text{day}} \right) = \frac{85 \text{ lbBOD}}{\text{day}}$$

Using similar calculation as above for the new loads of BOD, the old and new load for both TSS as well provided the following results.

BOD loads

Old BOD concentration 262 mg/l and flow of 39,000 gallons/day
(as shown above) 85.1 lb BOD/day

New BOD concentration 30 mg/l and flow of
50,000 gallons/day 12.5 lb BOD/day

The percent BOD load reduction would be 85%.

Total suspended solids (TSS) loads

Old concentration TSS 58 mg/l and flow of
39,000 gallons/day 18.8 lb TSS/day

New concentration TSS 10 mg/l and flow of
50,000 gallons per day 12.5 lb TSS/day

The percent TSS load reduction would be 34%.

Nitrate Loading

The current effluent value of nitrate is low, but it does have a concentration of 43 mg/l of Kjeldhal nitrogen which in an aerated environment should convert to roughly 43 mg/ of nitrate. Consider this potential nitrate.

Old (potential) concentration nitrate 43 gm/l and flow of
39,000 gallons 13.9 lb nitrate/day

New concentration NO₃ 10 mg/l and flow of
50,000 gallons 4.16 lb nitrate/day

The percent nitrate load reduction would be 70%.

040207

ENCLOSURE 9

040200



California Regional Water Quality Control Board
Lahontan Region



Linda S. Adams
Acting Secretary for
Environmental Protection

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(530) 542-5400 • Fax (530) 544-2271
www.waterboards.ca.gov/lahontan

Edmund G. Brown Jr.
Governor

March 18, 2011

G. David Robertson, Esq.
Robertson & Benevento
Bank of America Plaza
50 W. Liberty St. Suite 600
Reno, Nevada 89501

**RESPONSE TO COMMENTS IN LETTER RECEIVED FEBRUARY 22, 2011 ON THE
TENTATIVE WASTE DISCHARGE REQUIREMENTS, MOUNTAIN WARFARE
TRAINING CENTER COLEVILLE HOUSING WASTEWATER TREATMENT AND
DISPOSAL FACILITY, MONO COUNTY (WDID 6A268512900)**

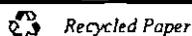
The California Regional Water Quality Control Board, Lahontan Region (Water Board) staff reviewed your letter dated February 22, 2011. This letter is in response to the comments in your letter on the Coleville Housing Wastewater Treatment Facility (Facility), which is owned and operated by Camp Pendleton & Quantico Housing LLC/Lincoln Military housing (Lincoln).

Comments

The following responses follow the outline of your comments.

1. The comments suggest the waste discharge requirements will adversely affect the Schwake Family personal and property rights. No information is provided for the assertion, and staff is unaware how the discharge will affect the property rights of the Schwakes or their personal rights. The Tentative - Proposed Waste Discharge Requirements do not authorize the discharge of wastewater on your client's property.
2. The comment indicates our depiction of the flow direction in Alkali Ditch is inaccurate and suggests increased wastewater discharge flow into Alkali Ditch will cause significant irreparable harm.
 - a. We appreciate you pointing out the inaccurate information in our map. The direction of flow in Alkali Ditch on our map will be corrected.
 - b. There is not and will not be any treated sewage wastewater discharging directly into Alkali Ditch. Other than storm water, water from the rinsing of resin material from the drinking water system may have been discharged at times in the past into the Alkali Ditch from leaks in the storm water retention basin outlet. The storm water retention basin outlet will be

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040209

reconstructed as part of the upgrades on the Mountain Warfare Training Coleville housing site and requirements have been added to prevent this type of discharge from occurring in the future. In the future, only storm water runoff will be discharged as surface flow from the basin.

3. The comment suggests Alkali Ditch already carries problematic wastewater onto the Schwake property. This was addressed in the comment above.
4. The comment indicates concurrence with a letter from Timothy W. Pemberton, who presented comments to the Water Board on behalf of the Coffron's. We have enclosed our response to Mr. Pemberton.

We hope the information we have provided will assist you and your client to better understand what will be occurring at the Coleville Housing. If you or your client still have concerns, questions or comments regarding this matter, please me at (530) 542-5467 or contact Alan Miller, Chief, North Basin Regulatory Unit, at (530) 542-5430.



Robert Tucker
Water Resource Control Engineer

Enclosure: Letter to Timothy Pemberton, response to comments

T:_Agenda items\2011\4-April\Coleville housing project\Proposed\Comments on tentative\Robertson rtt3-15-11

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ENCLOSURE 10

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TIMOTHY W. PEMBERTON

P.O. Box 485 Markleeville, CA 96120

ATTORNEY AT LAW

Ph. (530) 694-2490 Fax (530) 694-2325

March 22, 2011

Robert Tucker
Water Resources Control Engineer
Lahontan Region, Water Quality Control Board
2501 Lake Tahoe Blvd.
South Lake Tahoe, CA 96150
VIA FAX (530) 544-2271

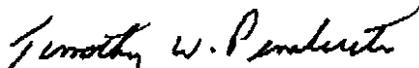
Re: Waste Discharge Requirement for the MWYC Coleville Housing Disposal Facility
WDED 6A268512900

Dear Mr. Tucker:

I am in receipt of your 3/18/11 correspondence (which I received yesterday, by mail). I have forwarded your response (and revised order/discharge/monitoring requirements) to Mr. Coffron for his review.

The last paragraph of your correspondence discusses the wastes from the drinking water system in response to paragraph 4 of my 3/11/11 correspondence in which I ask (i) whether the present order regulates waste from the drinking water system, (ii) the mode of disposal of waste from that system and (iii) records showing disposal from that system. You glibly respond "the other waste (spent resin) from the drinking water system is hauled off for disposal and is not regulated by our proposed Board Order. Since the disposal of the spent resin does not occur within the Lahontan Region, we do not regulate its disposal. We are considering requiring records be maintained on the location(s) of the spent filter media." Notwithstanding my request for records showing past disposal, no records were produced. Since it appears you have no records of the off-site disposal of the "spent resin", you cannot assert its disposal occurs outside the Lahontan Region. Without any evidence of where this material is disposed, the logical assumption is that it is stored on-site and, therefore, within Lahontan's jurisdiction. The waste discharge requirements should be revised to explicitly provide standards for the storage and disposal of the "spent resins" and maintenance of records regarding the storage and disposal locations.

Very Truly Yours,


Timothy W. Pemberton

040212