CHAPTER 10
Other CEQA Considerations

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OTHER CEQA CONSIDERATIONS

Section 15126 of the CEQA Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, an EIR must also identify: (1) significant environmental effects of the proposed project; (2) significant environmental effects that cannot be avoided if the proposed project is implemented; (3) significant irreversible environmental changes that would result from implementation of the proposed project; (4) growth-inducing impacts of the proposed project; (5) mitigation measures proposed to minimize significant effects; and (6) alternatives to the proposed project.

Each of the above considerations are either discussed in the individual resource chapters or in the executive summary, with the exception of information pertaining to surface water supply, socioeconomics, growth inducement and significant irreversible environmental impacts of the proposed project. Considerations regarding these four remaining issues are discussed below.

10.1 SURFACE WATER SUPPLY AVAILABILITY AND RELIABILITY

This section describes the existing surface water management conditions, applicable regulations, and potential effects on the availability and reliability of surface water supplies that could result from implementation of the Proposed Project Alternative or any of the other alternatives. Specifically, these alternatives are discussed regarding their potential to affect the District's surface water supply availability and reliability.

As discussed in Chapter 1, the proposed project evaluated in this Draft EIR is not a water supply project or an integrated water plan, and does not include any modification to the authorized rate and total amount of water that the District can divert under its surface water permit and licenses. Nor does the proposed project involve any increased or altered patterns of groundwater pumping levels in the Mammoth groundwater basin beyond the historical range of groundwater pumping (see Chapter 4). While water supply planning, identification of alternate supply sources, sustainability and management of available water resources to meet increased future demands within the District's service area are important considerations, these water supply issues are beyond the scope of the project proposed in this Draft EIR.

Concerns regarding designation of Mammoth Creek as "fully appropriated" and downstream water rights have been raised by stakeholders (see Chapter 1). However, issues associated with downstream water rights and determining whether Mammoth Creek is fully appropriated are separate water right issues that are not within the scope of this Draft EIR.

The long-term fishery bypass flow requirements for Mammoth Creek described and evaluated in this Draft EIR are specifically designed to address the needs of the Mammoth Creek fishery and its habitat, which is a separate matter from SWRCB considerations regarding downstream water rights and determining whether Mammoth Creek is fully appropriated.

LADWP claims appropriative and riparian water rights related to Mammoth Creek. For example, LADWP claims riparian rights for ranchland irrigation along Mammoth Creek as a result of its ownership of lands currently leased to Chance Ranch, located along several miles of lower Mammoth Creek to its confluence with Hot Creek. Although downstream water right

claims are not specifically addressed in this Draft EIR, information on surface water availability at the OLD395 Gage is presented in Chapter 4, in response to the request for such information by downstream users.

10.1.1 ENVIRONMENTAL SETTING

The District diverts water for municipal uses directly from Lake Mary pursuant to water right Permit 17332 and Licenses 5715 and 12593 (described below). The available supply from Lake Mary is limited due to lake drawdown restrictions and fishery bypass flow requirements in Mammoth Creek, and water right permit restrictions (WOCs). The amount of surface water available to the District also is dependent on the precipitation (snowfall) that occurs each year. In below normal precipitation years, groundwater supply is more heavily relied upon to supplement surface water supply, than during years of normal or above normal precipitation.

10.1.1.1 EXISTING DISTRICT WATER DEMANDS

The District provides water from surface and groundwater sources to a permanent population of about 7,560 people residing in the developed portion of the Town of Mammoth Lakes and other unincorporated areas (LAFCO 2009). However, the Town of Mammoth Lakes may have a peak weekend and holiday period population of up to about 35,000 people per day due to the influx of travelers and recreational enthusiasts. In communities that are popular tourist destinations, this pattern of peak population and water use that is several times the permanent base level is a common water supply and distribution issue (Town of Mammoth Lakes 2010).

Seasonal population peaks and landscape irrigation drive water supply demands. People visit the area to enjoy the recreational opportunities. Although peak populations generally occur during the winter season, the peak annual 30-day water demand occurs during the summer months due to landscape irrigation systems.

The total water demand in the District's service area affects the amount and timing of the District's diversions of water from Lake Mary. While sufficient inflows may exist to allow for the maximum diversion (5.039 cfs) to occur, actual diversion may be less, depending on the total demand within the District's service area, and upon meeting permit and license conditions. The District has no off-stream storage capacity and does not divert water in excess of that required to meet demands at any given time. For these reasons, actual diversions from Lake Mary are generally less than would be allowed under both the regulatory and physical constraints pertaining to District operations.

10.1.1.2 EXISTING FACILITIES

Water diverted from Lake Mary is conveyed to the District's Lake Mary WTP, which is monitored and controlled through a SCADA system. The Lake Mary WTP has a maximum capacity to treat about 5 cfs. No expansion of the treatment facility is proposed under any of the alternatives. Water provided from surface water diversions is distributed within the District service area.

10.1.1.3 DISTRICT WATER SUPPLY AVAILABILITY AND RELIABILITY

The District's Urban Water Management Plan (2005) states that "*…sources of water supply consist of surface water and groundwater. The area is susceptible to drought and both of these sources of supply are impacted to various degrees. Surface water supplies are immediately impacted following a drought season whereas groundwater supplies tend to be affected by an extended drought period of several years*."

The District has analyzed projected future water demand and supply reliability data, and concluded that the third and fourth years of multiple dry years would result in a supply deficiency as the Town nears buildout (MCWD 2005). A single extreme dry year would also result in a supply deficiency. The District has identified means of reducing the impact from drought years including the following:

- Reducing demand through water restrictions, primarily restrictions on irrigation
- Use of recycled water
- Reducing distribution system losses by replacement of aging lines and regular leak detection surveys
- Developing additional groundwater production capacity

10.1.2 REGULATORY SETTING

The Lahontan RWQCB has specified various "beneficial uses" of Mammoth Creek water, meaning reasonable uses of the water for purposes consistent with state water law and the interests of the state (LRWQCB 1994a). These beneficial uses include municipal and domestic supply, and are applicable to the District.

10.1.2.1 DISTRICT SURFACE WATER APPROPRIATIVE RIGHTS

The SWRCB regulates surface water diversions by the District. It has issued the District three appropriative rights to divert surface water from Lake Mary. Under its surface water rights (Permit 17332, and Licenses 5715 and 12593), the District can directly divert 5.039 cfs from May through November 1, and 5 cfs for the balance of the year. License 5715 authorizes the diversion of 0.039 cfs from May 1 to November 1. License 12593 authorizes the diversion of 2 cfs year round with a maximum annual diversion under it and License 5715 of 1,463 AF. Permit 17332 authorizes the District to divertly direct an additional 3 cfs year-round. Pursuant to Permit 17332, the District can store 606 AF in Lake Mary from April 1 to June 30, and an additional 54 AF from September 1 to September 30. The total amount that can be taken from the source under the permit is 1,920 AF per water year of October 1 to September 30. The total annual diversion, whether by direct diversion or diversion from storage, under all of the rights, cannot exceed 2,760 AF per year.

The WOCs apply to the District's diversions under Permit 17332. Therefore, the fishery bypass flow requirements and the Lake Mary drawdown limitations apply only to such diversions. Diversions pursuant to the two licenses (Licenses 5715 and 12593) are subject to California Fish and Game Code Section 5937.

10.1.2.2 URBAN WATER MANAGEMENT PLANNING ACT (CALIFORNIA WATER CODE SECTIONS 10610 – 10656)

Enacted by the California Legislature in 1983, the Urban Water Management Planning Act (UWMP) (Division 6 Part 2.6 of the Water Code §10610-10656) requires that all urban water suppliers providing water for municipal purposes to 3,000 or more customers, or supplying more than 3,000 AF of water annually, must prepare and update every five years, an urban water management plan. An UWMP also is considered to be a source of information for water supply assessments (Water Code §10613 et seq.) and written verifications of water supply (Water Code §66473.7). Additionally, a UWMP may serve as a long-range planning document for water supply and a source document for cities and counties as they prepare their General

Plans (DWR 2005). The District completed an updated UWMP in 2005, which was adopted by the District Board of Directors in December 2005. The District plans to prepare an updated plan this year.

10.1.3 SURFACE WATER SUPPLY AVAILABILITY AND RELIABILITY ASSESSMENT APPROACH

To assess potential effects on surface water supply availability and reliability, the MCWD Model is used to simulate District operations under each of the alternatives and the Existing Condition over the 20-year evaluation period extending from April 1988 through March 2008. Differences in monthly averages of daily District diversions to the Lake Mary WTP by runoff year, and by runoff year type, for the 20-year evaluation period are calculated for each of the alternatives, relative to the Existing Condition.

10.1.4 ANALYSIS OF ALTERNATIVES

10.1.4.1 PROPOSED PROJECT ALTERNATIVE COMPARED TO THE EXISTING CONDITION

Results presented in Appendix D-1 demonstrate that diversions to the Lake Mary WTP vary by month and runoff year type. Relative to the Existing Condition, average surface water diversions to the Lake Mary WTP under the Proposed Project Alternative are slightly higher (1.5 AF) over the 20-year long-term average, slightly lower (0.2 AF) during Dry runoff year types, and slightly higher (2.6 AF) during Normal runoff year types. During Wet runoff year types, there is no difference in the average diversion of surface water to the Lake Mary WTP between the Proposed Project Alternative and the Existing Condition.

Increases in annual average surface water diversions to the Lake Mary WTP occur during 10% (2 of the 20) of the years included in the evaluation period, whereas reductions occur during 20% (4 of the 20) of the years.

Over the 20-year evaluation period, the least amount of surface water supply occurs during 1992 when only approximately 606 AF are diverted to the Lake Mary WTP under the Proposed Project Alternative, and 616 AF under the Existing Condition.

The greatest reduction (approximately 36 AF) in annual surface water supply occurs during 1988 (a dry year) under the Proposed Project Alternative compared to the Existing Condition.

During the relatively dry year sequence extending from 1988 – 1992, a total of approximately 5,740 AF (annual average of 1,148 AF) are diverted to the Lake Mary WTP under the Proposed Project Alternative, and a total of 5,696 AF (annual average of 1,139 AF) under the Existing Condition, for a relative total difference of 44 AF and an annual average of 8.8 AF more surface water supply available under the Proposed Project Alternative. Differences in diversions to the Lake Mary WTP under the Proposed Project Alternative relative to the Existing Condition during the dry year sequence are expressed as percentage change as follows:

Year	Percent Change in Diversion Relative to the Existing Condition
1988	-2.6
1989	3.5
1990	3.9
1991	-0.7
1992	-1.6

10.1.4.2 Bypass Flow Requirements Alternative No. 2 Compared to the Existing Condition

Results presented in Appendix D-2 demonstrate that diversions to the Lake Mary WTP vary by month and runoff year type. Relative to the Existing Condition, average surface water diversions to the Lake Mary WTP under the Bypass Flow Requirements Alternative No. 2 (BFR Alt 2) are lower (22.2 AF) over the 20-year long-term average, lower (57.4 AF) during Dry runoff year types, and lower (17.9 AF) during Normal runoff year types. During Wet runoff year types, there is essentially no difference in the average diversion of surface water to the Lake Mary WTP between BFR Alt 2 and the Existing Condition.

Increases in annual average surface water diversions to the Lake Mary WTP do not occur over the 20 years included in the evaluation period, whereas reductions occur during 30% (6 of the 20) of the years.

Over the 20-year evaluation period, the least amount of surface water supply occurs during 1992 when only approximately 585 AF are diverted to the Lake Mary WTP under BFR Alt 2, and 616 AF under the Existing Condition.

The greatest reduction (approximately 176 AF) in annual surface water supply occurs during 1988 (a dry year) under BFR Alt 2 compared to the Existing Condition.

During the relatively dry year sequence extending from 1988 – 1992, a total of approximately 5,266 AF (annual average of 1,053 AF) are diverted to the Lake Mary WTP under BFR Alt 2, and a total of 5,696 AF (annual average of 1,139 AF) under the Existing Condition, for a relative total difference of 430 AF and an annual average of 86 AF less surface water supply available under BFR Alt 2. Differences in diversions to the Lake Mary WTP under BFR Alt 2 relative to the Existing Condition during the dry year sequence are expressed as percentage change as follows:

Year	Percent Change in Diversion Relative to the Existing Condition
1988	-12.6
1989	-4.3
1990	-5.9
1991	-9.1
1992	-5.1

10.1.4.3 Permit 17332 Bypass Flow Requirements Alternative Compared to the Existing Condition

Results presented in Appendix D-3 demonstrate that diversions to the Lake Mary WTP vary by month and runoff year type. Relative to the Existing Condition, average surface water diversions to the Lake Mary WTP under the Permit 17332 Bypass Flow Requirements (P-17332 BFR Alt) are lower (188.5 AF) over the 20-year long-term average, lower (445.5 AF) during Dry runoff year types, and lower (163.8 AF) during Normal runoff year types, and lower (5.4 AF) during Wet runoff year types.

Increases in annual average surface water diversions to the Lake Mary WTP do not occur over the 20 years included in the evaluation period, whereas reductions occur during 55% (11 of the 20) of the years.

Over the 20-year evaluation period, the least amount of surface water supply occurs during 1990 when only approximately 290 AF are diverted to the Lake Mary WTP under P-17332 BFR Alt, and 905 AF under the Existing Condition.

The greatest reduction (approximately 975 AF) in annual surface water supply occurs during 1989 (a normal year, following a dry year) under P-17332 BFR Alt compared to the Existing Condition.

During the relatively dry year sequence extending from 1988 – 1992, a total of approximately 2,571 AF (annual average of 514 AF) are diverted to the Lake Mary WTP under P-17332 BFR Alt, and a total of 5,696 AF (annual average of 1,139 AF) under the Existing Condition, for a relative total difference of 3,125 AF and an annual average of 625 AF less surface water supply available under P-17332 BFR Alt. Differences in diversions to the Lake Mary WTP under P-17332 BFR Alt relative to the Existing Condition during the dry year sequence are expressed as percentage change as follows.

Year	Percent Change in Diversion Relative to the Existing Condition
1988	-66.4
1989	-55.6
1990	-67.9
1991	-47.5
1992	-19.6

10.1.4.4 NO PROJECT ALTERNATIVE (EXISTING LEVEL OF DEMAND) COMPARED TO THE EXISTING CONDITION

Relative to the Existing Condition, average surface water diversions to the Lake Mary WTP under the No Project Alternative (Existing Level of Demand) are lower (17.5 AF) over the 20-year long-term average, lower (58.2 AF) during Dry runoff year types, and lower (9.9 AF) during Normal runoff year types (Appendix D-4). During Wet runoff year types, there is no difference in the average diversion of surface water to the Lake Mary WTP between the No Project Alternative (Existing Level of Demand) and the Existing Condition.

Increases in annual average surface water diversions to the Lake Mary WTP do not occur over the 20 years included in the evaluation period, whereas reductions occur during 25% (5 of the 20) of the years.

Over the 20-year evaluation period, the least amount of surface water supply occurs during 1992 when only approximately 616 AF are diverted to the Lake Mary WTP under both the No Project Alternative (Existing Level of Demand) and under the Existing Condition.

The greatest reduction (approximately 130 AF) in annual surface water supply occurs during 1988 (a dry year) under the No Project Alternative (Existing Level of Demand) compared to the Existing Condition.

During the relatively dry year sequence extending from 1988 – 1992, a total of approximately 5,359 AF (annual average of 1,072 AF) are diverted to the Lake Mary WTP under the No Project Alternative (Existing Level of Demand), and a total of 5,696 AF (annual average of 1,139 AF) under the Existing Condition, for a relative total difference of 337 AF and an annual average of 67 AF less surface water supply available under the No Project Alternative (Existing Level of Demand). Differences in diversions to the Lake Mary WTP under the No Project Alternative (Existing Level of Demand) relative to the Existing Condition during the dry year sequence are expressed as percentage change as follows.

Year	Percent Change in Diversion Relative to the Existing Condition
1988	-9.3
1989	-2.1
1990	-11.4
1991	-6.5
1992	0

10.1.5 FUTURE (NO PROJECT AND PROPOSED PROJECT ALTERNATIVE FUTURE LEVEL OF DEMAND) WATER SUPPLY AVAILABILITY AND RELIABILITY

As discussed in Chapter 3, the No Project Alternative and the Proposed Project Alternative Future Level of Demand are analyzed using output from MCWD Model at a future level of demand (i.e., projected utilization of permitted surface water supplies at maximum buildout in 2025) to address potential environmental impacts. However, it is not appropriate to use output from the MCWD Model to assess potential effects on water supply availability and reliability, because the MCWD Model simply reflects diversions to the Lake Mary WTP associated with future level of demand, and does not address effects on the District's surface water availability and reliability per se. The ability of the District to meet future water demands within the service area with surface water supply, and associated issues are addressed in other sections of this chapter (e.g., see Sections 10.2 and 10.3).

For CEQA, the purpose of the cumulative analysis is to determine whether the incremental effects of the Proposed Project Alternative would be expected to be "cumulatively considerable" when viewed in connection with the effects of past projects, other current projects, and probable future projects (PRC Section 21083, subdivision (b)(2)).

Therefore, a supplemental, qualitative cumulative analysis also is conducted to evaluate potential cumulative effects to the District's surface water supply. Past, present, and "reasonably foreseeable" projects are described in Chapter 3. Only projects that could affect surface water supply are considered in this section.

As described in Chapter 1, the District has a significant water conservation program, and has continued to pursue a variety of alternatives to enhance the community's water supplies, including the use of recycled water. The District is committed to carefully and effectively managing and maintaining the local water resources of the Mammoth Lakes Basin, and recognizes the importance of implementing water demand reduction measures to encourage more efficient use of available water resources. Some of the key actions include, but are not limited to: (1) water survey programs for residential customers; (2) public and school information programs; (3) large landscape conservation programs and incentives; (4) a water conservation program that, to the extent applicable and feasible, incorporates BMPs for urban water conservation measures; and (5) an ongoing leak-detection project to reduce water losses in the water distribution system. The continuation of these efforts will improve the District's ability to meet service area demands in the future and, consequently, effective water supply availability and reliability.

During the scoping process for this Draft EIR, the issue of declaring Mammoth Creek to be a fully appropriated stream system was raised. This topic also has been the subject of previous discussion between the District and the SWRCB. As previously discussed, issues associated with downstream water rights and determining whether Mammoth Creek is fully appropriated are separate water right issues that are not related to the CEQA compliance process for this

Draft EIR. Regardless, a declaration of Mammoth Creek as a fully appropriated stream system would limit future appropriations of water from the creek.

The USFS, Inyo National Forest, has filed Applications 31365 and 31366 with the SWRCB for water right permits to confirm the installation of existing dams and its long-standing storage of water in Lake Mamie and Twin Lakes. Water collected to storage is used for fish and wildlife enhancement and recreational purposes. The outcome of these applications is not expected to affect the District's surface water supply.

10.2 SOCIOECONOMICS

The purpose of the socioeconomic section is to evaluate the effects of the project alternatives on the socioeconomic character of the Town of Mammoth Lakes and region. As stated in CEQA Guidelines Section 15064(e), "economic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment. Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant."

10.2.1 STUDY AREA JURISDICTIONS

The Project Area, which includes the Mammoth Creek Basin from Lake Mary to the confluence of Mammoth Creek with Hot Creek, is subject to the economic and regulatory environment of three jurisdictions, including the Town of Mammoth Lakes, the Inyo National Forest under the administration of the USFS, and Mono County. Lake Mary and Mammoth Creek Reach A, and the upper portion of Reach B, are located within the boundary of the Town of Mammoth Lakes. Bodle Ditch, which originates at Lake Mary is also located in the Town of Mammoth Lakes. The lower portion of Mammoth Creek Reach B and Reaches C, D, and E are located in unincorporated Mono County. In addition, Lake Mary, Bodle Ditch, and the upper portion of Mammoth Creek Reach A, as well as the lower portion of Reach B and Reaches C and D to the west of Highway 395 are located on USFS lands. Reach E to the east of Highway 395 is located in unincorporated Mono County, outside of the jurisdiction of the USFS.

10.2.1.1 TOWN OF MAMMOTH LAKES

The Town of Mammoth Lakes is the economic center of the Project Area. According to the Mammoth Lakes General Plan, the economic viability of the Town of Mammoth Lakes relies strongly on the sustainability of mountain resort facilities including the Mammoth Mountain ski resort and an expanded and accessible system of parks, open space, and trails. The Inyo National Forest administered by the USFS comprises a large percentage of the extended Town of Mammoth Lake and the surrounding area, and is an important component of the local economy. Because of the proximity of the Town of Mammoth Lakes to National Forest, many National Forest land uses are directly related to the support of Mammoth's tourist industry.

The intent of the Town of Mammoth Lakes General Plan is to serve as a blueprint for the physical development of the community and a foundation for optimizing land use decisions

based on goals and policies related to land use, population growth and distribution, development, and other related physical social and economic factors. Community goals under the Economic Element of the General Plan are sustainable full employment, better paying full-time economic opportunities, and a less weather-dependent and more predictable income stream. The core tenets of the Economic Element are to increase regional accessibility, create more recreational and leisure activities, and diversify economic development to create a more stable and sustainable economy. The goal and policy of the General Plan that would be most applicable to project alternatives are as follows:

- E.2. GOAL: Achieve sustainable tourism by building on the area's natural beauty, recreational, cultural, and historic assets.
- E.2.A. Policy: Support a range of outdoor and indoor events facilities, and services that enhance the community's resort economy

The improvement in the reliability of the municipal water supply under the project alternatives would support the economic goals of the Town of Mammoth Lakes to maintain the community's resort economy, since the continuation of the Town's economy viability relies on a consistent and reliable water supply. In addition, the poject alternatives would support the goals and policies of the Mammoth Lakes General Plan to enhance the natural beauty and recreational assets of the Town by providing fishery bypass flow requirements for Mammoth Creek that would continue to support fisheries, riparian vegetation, and the scenic character of Mammoth Creek. The project alternatives would also retain the existing, permitted maximum water level in Lake Mary during the summer season and, as such, maintain the recreational and economic viability of Lake Mary.

The Permit 17332 Bypass Flow Requirements Alternative proposes certain increases in the fishery bypass flow requirements from April through August compared to the fishery bypass flow requirements under the Existing Condition and the remaining three alternatives (the Proposed Project Alternative, Bypass Flow Requirements Alternative No. 2, and the No Project Alternative). The Proposed Project Alternative would maintain the same fishery bypass flow requirements in Mammoth Creek during the spring and summer months (March through August) as under the Existing Condition implemented in 1997 pursuant to a court order, with the addition of a year-round 4 cfs fishery bypass flow requirement at the Old 395 Gage. Since the existing fishery bypass flow requirements have been sufficient to maintain fisheries, aquatic resources, and riparian vegetation along Mammoth Creek in "good condition", all of the four alternatives would continue to support the economic viability of Mammoth Creek as a scenic and recreational resource for the Town. However, the Permit 17332 Bypass Flow Requirements Alternative would take more water from the municipal system during a dry period and may reduce the reliability of the Town's water supply and have a secondary adverse effect on the local economy.

10.2.1.2 INYO NATIONAL FOREST

The Inyo National Forest makes a direct contribution to the region's economy through expenditures in the private sector, the generation of jobs, recreational opportunities, and payments into county revenues. The National Forest also provides indirect economic benefits by supplying certain goods and services at prices below established or estimated market values. Examples include outdoor recreation opportunities and forest lands for the use of commercial enterprises such as livestock production, resort facilities, and water production. The Inyo

National Forest currently provides 972 special use permits in the Inyo National Forest.[1] According to the USFS Inyo National Forest Land and Resource Management Plan (LRMP), special use permits, which include alpine ski areas on USFS land, are particularly important to the local economy. In addition to alpine skiing, USFS recreational special use permits include summer resorts and marinas at Lake Mary. Approximately twenty-five percent of revenues from special permits are returned to local county governments. The Inyo National Forest ranks first in the nation in revenues received from recreation special use permits.

The Inyo National Forest LRMP (1988) prescribes management direction for the multiple use and sustained yield of public benefits for the Inyo National Forest, and responds to major public issues and management concerns, including the long-term cost efficiency and maintenance of economic stability for recreation-based Eastern Sierra Communities. LRMP Chapter 3 summarizes economic concerns and identified resources, including recreational resources.

The Project Area is located within two LRMP Management Areas including Management Area #8, the Mammoth Escarpment, and Management Area # 9, Mammoth. Management Area # 8 incorporates Mammoth Lakes Basin, including Lake Mary, Lake Mamie, Twin Lakes, and the Mammoth Creek headwater, as well as the crest and mountainous area surmounting Mammoth Lakes Basin. Developed recreation is the primary use in Management Area #8, and, according to the LRMP, this area has more recreation visitors than any other area in the USFS.

Specific economic policies for Management Area #8 are the (1) management of water resources within the Mammoth Lakes Basin to provide adequate protection of natural resources, and to serve recreational demand along with water supply needs, and (2) to satisfy municipal water supply needs after natural resources are met. The District manages water levels at Lake Mary to conserve this natural resource in way that is not detrimental to natural resources. The Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative would change the fill date for Lake Mary in the WOCs from June 1 to June 30 to correspond to the District's authorized storage season in Permit 17332. This change also would accommodate naturally occurring variations in yearly snowmelt and would not affect the recreational use or economic viability of the lake.

A primary goal of the USFS as expressed in the LMRP is to provide day-use and camping in the Mammoth Lakes Basin. The Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative would amend the District's authorized POU to continue to provide water service to recreational uses located within Management Area #8. Recreational uses in the Lakes Basin that currently receive water service, but are located outside the authorized POU, include Twin Lakes Campground, Sierra Meadows/USFS Pack Offices, Mammoth Creek Park, YMCA of Metropolitan Los Angeles, Mammoth Lakes Pack Station, Twin Lakes Art Gallery, and Tamarack Lodge. Therefore, these alternatives would support the recreational and economic viability of USFS lands in Management District #8. The No Project Alternative would not amend the authorized POU and, as such, could result in the discontinuation of water service to some of these recreational uses. This alternative could result in a potential economic detriment with respect to USFS lands, since other types of water service may be prohibitively costly or not available and, as such, these recreational facilities could be closed or reduced in scale.

USFS Mammoth Management Area (#9) incorporates the urbanized portion of the Town of Mammoth Lakes, including private land within the town. Mammoth Management Area (#9)

[1] United States Forest Service. Inyo National Forest Land and Resource Management Plan. 1988.

also incorporates National Forest land surrounding the Town of Mammoth Lakes to the east, and south, and includes land owned by the City of Los Angeles in the eastern portion of the Management Area. Because of the proximity of the Town of Mammoth Lakes to the National Forest, many National Forest land uses are directly related to the economic support of the Town.

Visitor-related policies that are applicable to Management Area #9, which is a designated Concentrated Recreation Area under the LRMP, include prohibiting dispersed camping throughout the Management Area and maintaining open-space areas adjacent to the Town of Mammoth Lakes for passive recreation.

Sherwin Creek Campground and Mammoth Creek are important USFS recreational resources in Management Area #9. Sherwin Creek Campground, which is located downstream from confluence of Sherwin Creek and Mammoth Creek, experiences heavy recreation use. Although outside the boundaries of the Town of Mammoth Lakes, the heavy use of the Sherwin Creek Campground provides a secondary benefit to the Town's tourist-oriented businesses, including restaurants, museums, and entertainment. Also in Management Area #9 is the Shady Rest Park, which is operated by the Town of Mammoth Lakes. As with Sherwin Creek Campground, Shady Rest Park supports camping and the economic vitality of the Town of Mammoth Lakes. The Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative would amend the authorized POU to continue to provide water service Sherwin Creek Campground and Shady Rest Park. However, the No Project Alternative would not amend the authorized POU and, as such, could result in the discontinuation of water service to these recreational uses. Because other types of water service may be prohibitively costly or may not be available to these uses, these recreational facilities could be closed or reduced in scale. Therefore, the discontinuation of water services to these recreational uses under the No Project Alternative could result in a potential economic detriment.

Dispersed uses also occur along Mammoth Creek and on Forest lands immediately adjacent to private land in the Town of Mammoth Creek. Hot Creek Interpretive Site, a day-use area located in Management Area #9, focuses on the interpretation of the geologic resource and is one of the Forest Service's most popular tourist destinations and a benefit to the economies of the Town of Mammoth Lakes and Mono County.

The continuation of the fishery bypass flow requirements for Mammoth Creek would retain fisheries, aquatic resources, and riparian vegetation along Mammoth Creek, while meeting the LRMP objective to maintain areas that are suitable for passive recreation.

10.2.1.3 MONO COUNTY

Mono County has regulatory authority along a portion of the Mammoth Creek's lower basin in Reach E. The county's authority applies to unincorporated areas; however, the county's general economic policies also apply to the various municipalities making up the county. The economic objective of the Mono County General Plan (Objective H) is to maintain and enhance the local economy. Economic policies include the following:

- Policy 4: Develop strategies to improve the county's economic climate.
- Action 4.5: Promote economic development that is consistent with General Plan goals and objectives relating to land use, open space, and conservation of natural resources.
- Policy 5: Promote diversification and continued growth of the county's economic base.

- Action 5.1: Encourage and promote the preservation and expansion of the county's tourist and recreation-based economy.
- Action 5.4: Concentrate development in existing communities in order to facilitate community economic growth.

The Proposed Project Alternative and the Bypass Flow Requirements Alternative No. 2 would improve the reliability of water supply to the Town of Mammoth Lakes and maintain recreational resources. Therefore, these alternatives would also support the policies of the Mono County General Plan to concentrate development in existing communities to facilitate community economic growth and improve the county's economic climate through the preservation and expansion of the county's tourist and recreation-based economy. Under all project alternatives, resources in unincorporated Mono County, including fisheries and aquatic resources in Reach E and recreational opportunities in the Hot Springs area near the confluence of Mammoth Creek with Hot Creek would be maintained. Since no adverse impacts on any resources in unincorporated Mono County are anticipated under any of the project alternatives, all of the project alternatives would be consistent with the economic objectives of the Mono County General Plan. The project alternatives would, therefore, support the economic goals of the county.

10.2.2 COMPARISON OF PROJECT ALTERNATIVES

The fishery bypass flow requirements under all project alternatives would be adequate to maintain fisheries, aquatic resources, and riparian vegetation along Mammoth Creek in good condition and, as such, would continue to support the economic viability of Mammoth Creek as a scenic and recreational resource for the area. However, the Permit 17332 Bypass Flow Requirements Alternative would take more water from the municipal system during a dry period. A reduction in municipal water would potentially reduce the reliability of the Town's water supply and have a secondary adverse effect on the local economy. Secondary effects may include more stringent water conservation measures than currently implemented by the District during dry periods and potential water shortages. As such, the Permit 17332 Bypass Flow Requirements Alternative would potentially have a detrimental effect on the local economy in contrast with the other project alternatives.

As discussed in the Chapter 2 – Proposed Project and Alternatives, of this Draft EIR, the Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative would amend the District's authorized POU to continue to provide water service to recreational uses located within USFS lands. Recreational uses in the Lakes Basin that currently receive water service, but are located outside the authorized POU, include Twin Lakes Campground, Sierra Meadows/USFS Pack Offices, Mammoth Creek Park, YMCA of Metropolitan Los Angeles, Mammoth Lakes Pack Station, Sherwin Creek Campground, Shady Rest Park, Twin Lakes Art Gallery, and Tamarack Lodge. By contrast, the No Project Alternative would not amend the authorized POU and, as such, could result in the discontinuation of water service to these recreational uses. Because other types of water service may be prohibitively costly or may not available to these uses, these recreational facilities could be closed or reduced in scale. Therefore, the potential discontinuation of water services to these recreational uses under the No Project Alternative could result in a potential reduction in the area's recreational resources and a detriment on the local economy.

10.3 GROWTH INDUCEMENT

The purpose of the Growth Inducement section is to evaluate the potential of the project alternatives to result in growth in the MCWD service area. CEQA Guidelines Section 15126.2(d) requires an EIR to discuss the ways in which a project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth inducing impacts include the removal of obstacles to population growth (e.g., a major expansion of a water treatment plant that might allow for more construction in a service area). Increases in the population may tax existing community service facilities that could significantly affect the environment, either individually or cumulatively. According Section 15126.2(d), it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

10.3.1 TOWN OF MAMMOTH LAKES

The Town of Mammoth Lakes is the population center of Mono County, as well as the District's primary service area. Based on the 2000 Census, the residential population of the Town of Mammoth Lakes was 7,094, which represents over half of the 12,853 residents in Mono County. The Town of Mammoth Lakes has experienced a residential population increase of approximately 80 percent over the past twenty years and an increase of more than 48 percent in the past ten years. The 2004 residential population estimates include 7,569 permanent and 2,264 seasonal residents with an average peak period population of approximately 34,265. The peak period population is counted as "persons at one time" (PAOT), which includes seasonal residents and visitors. Because the Town of Mammoth Lakes is an important recreational and tourist destination, the PAOT can significantly exceed the Town's permanent residential population. As of January 2004, the Town of Mammoth Lakes provided approximately 9,871 residential units, 6,821 of which are multi-unit transient units.

The Town of Mammoth Lakes General Plan Growth General Plan governs the location of all new growth. Under the General Plan, growth would be limited entirely to the Town's urban growth boundary (UGB) and to the area of the Mammoth Airport near U.S. 395. As shown in **Table 10-1**, below, the Town of Mammoth Lakes General Plan would accommodate a peak PAOT of 60,700, for an increase of 26,431 persons over a 20-year period. The General Plan would allow for construction of new housing units, increased utilization of residential property, as well as commercial and industrial growth. The General Plan would allow up to 16,710 residential units, representing an increase of approximately 6,839 residential units over the Town's existing 9,871 residential units. Industrial acreage would increase from 36 acres to 64 acres, and commercial office acreage would increase from 58 acres to 84.5 acres.

Growth under the General Plan is dependent on demand for recreational and related opportunities in the area, which originates in other parts of California and the West. According to the Town of Mammoth Lakes General Plan Final EIR, as these regions may grow during the next 20 years, demand for residential, commercial, and industrial space in the Town of Mammoth Lakes would also continue to grow.[2] The Final EIR for the General Plan determined that growth would place additional demand on available resources, and, therefore, the following resource management policy is provided in the General Plan to reduce potential impacts on water resources:

[2] Source: Town of Mammoth Lakes. Town of Mammoth Lakes General Plan Update Final EIR. SCH# 2003042155. Prepared by PCR Services Corporation. January 2008.

Table 10-1. Maximum Buildout of the Town of Mammoth Lakes General Plan

Land Use	Existing[a] Population/ Development (Units or Square Feet/Acre)	Build-Out[b] Population/ Development (Units or Square Feet/Acre)	Increase
Population (persons)	34,265 POAT	60,727 POAT	26,462 POAT
Total Units	9,871 units	16,710 units	6,839 units
Single Family Non-transient	2,087 units/ 409 acres	2,380 units / 576 acres	293 units/ 167 acres
Single Family Transient	0 units/ 0 acres	97 units / 24 acres	97 units/ 24 acres
Mobile Home	136 units/ 15 acres	144 units/ 16 acres	8 units/ 1acre
Multi-Unit Non-Transient	827 units/ 60 acres	2,091 units/ 119 acres	1,264/ 59 acres
Multi-Unit Transient	6,821 units/ 402 acres	11,998 units/ 559 acres	5,177/ 157 acres
Commercial/Office Uses	1,262,618 sf/ 58 acres	1,365,002 sf/ 84.5 acres	102,384 sf/ 26.4 acres
Industrial	296,941 sf / 36 acres	493,547 sf 64 acres	196,606 sf./ 28 acres

[a] The baseline for existing development is 2004
[b] The General Plan buildout year is 2025

Source: Town of Mammoth Lakes. Town of Mammoth Lakes General Plan Update Final EIR. SCH# 2003042155. Prepared by PCR Services Corporation. January 2008.

- R.4. GOAL: Conserve and enhance the quality and quantity of Mammoth Lakes' water resources.
- R.4.A. Policy: The Town shall work with MCWD to ensure that land use approvals are phased so that the development of necessary water supply sources is established prior to development approvals.

The October 2009 Mammoth Community Water District's Municipal Service Review and Sphere of Influence Recommendation (Municipal Service Review) identifies use patterns in the District and constraints on the District's water supply (Mono County LAFCO 2009). The Municipal Service Review states that, although peak populations occur during the winter season, peak water demand occurs during the summer due to landscape irrigation. **Table 10-2**, below, summarizes water demand among the District's various use sectors.

According to the Municipal Service Review, the District's water sources consist of surface water and groundwater. The Municipal Service Review states that the area is susceptible to drought and both of these sources of supply are impacted to various degrees. Surface water supplies are immediately impacted following a drought season whereas groundwater supplies tend to be affected by an extended drought period of several years. The Municipal Service Review also states that surface water supplies from Lake Mary are affected by constraints on lake level drawdown and Mammoth Creek fishery bypass flow requirements. According to the Municipal Service Review, the total annual diversion from Lake Mary may not be available during periods of drought.

The Municipal Service Review states that, based on an analysis of projected future water demand data and current supply reliability data, the District has concluded that the third and fourth years of multiple dry years would result in a supply deficiency as the town nears build-out. A single extreme dry year would also result in a supply deficiency. The District has identified means of reducing the impact from drought years including the following:

Table 10-2. Past, Present, and Projected Water Demand in Acre-Feet

Water Use Sector	2000	2005	2010	2015	2020	2025
Single Family Residential	515	549	586	623	659	696
Condominium	961	948	960	973	985	997
Multi-Family Residential	144	140	211	282	353	424
Commercial/Industrial/Public	217	278	374	469	565	660
Motel/Hotel	112	111	304	496	689	881
Public Sector	170	296	Included in commercial	Included in commercial	Included in commercial	Included in commercial
Golf Course[a]	297	255	400	400	400	400
Other[b]	53	103	80	80	80	80
Unaccounted	486	746	760	760	760	760
Total:	2,955	3,426	3,674	4,082	4,490	4,898

[a] Golf course water use is based on existing demand from Sierra Star and Snowcreek Golf Courses. This value would be reduced by the use of recycled water in the future.

[b] Other: Treatment plant process water, fire fighting, line cleaning, etc.

Source: Mammoth Community Water District. Municipal Service Review and Sphere of Influence Recommendation. Prepared by Mono County Local Agency Formation Commission. October 2009.

- Reducing demand through water restrictions, primarily restrictions on irrigation
- Use of recycled water
- Decreasing the percentage of water losses in the system
- Developing new groundwater sources in the Dry Creek and Mammoth Basin watersheds

The District's 2005 Urban Water Management Plan (UWMP), anticipates a need to increase water supplies from 6,760 AF annually to 8,120 AF annually to accommodate anticipated demand under the buildout of the Mammoth Lakes General Plan. The Final EIR for the General Plan determined that, even with this increase, a deficit of 488 AF would occur in a single dry water year. However, the Final EIR also determined that, with the increase in future water supplies under the 2005 UWMP, i.e. demand reduction, new groundwater wells, recycled water delivery, and implementation of a water shortage contingency plan, , the projected water demand associated with the buildout of the General Plan would not exceed the water supply. To mitigate any potential shortfall, the General Plan requires the Town of Mammoth Lakes to work with MCWD to ensure that land use approvals are phased until the availability or development of future water supply sources can be developed. In this regard, future development is contingent upon and enabled by the availability of water.

The project alternatives would not increase the existing allotment of 2,760 AF per year from Lake Mary at the present time or in the future. None of the project alternatives include a request for an increase in annual supplies or for an increase in the draw from Lake Mary. Therefore, none of the project alternatives would incrementally contribute to the projected future increase in water supply.

Table 10-3, as shown, additional water to serve population growth would be acquired from recycled water and a future well), if needed. Since the project alternatives would not increase water supplies over existing conditions, the project alternatives would not remove obstacles to growth based on water supply availability, or have an effect on the population growth and development envisioned under the Town of Mammoth Lakes General Plan.

Table 10-3. UWMP Current and Projected Water Supplies in Acre-Feet Per Year

Water Supply Sources	2005	2010	2015	2020	2025
Lake Mary	2,760	2,760	2,760	2,760	2,760
Well #1	500	500	500	500	500
GWTP #1	2,000	2,000	2,000	2,000	2,000
GWTP #2	1,500	1,500	1,500	1,500	1,500
Recycled Water	0	360	360	360	360
Future Wells	0	0	1,000	1,000	1,000
Total	6,760	7,120	8,120	8,120	8,120

GWTP = Groundwater Treatment Plant

Source: Town of Mammoth Lakes. Town of Mammoth Lakes General Plan Update Final EIR. SCH# 2003042155. Prepared by PCR Services Corporation. January 2008

10.3.2 INYO NATIONAL FOREST

The USFS Inyo National LRMP guides growth in USFS lands through specific policies for designated management areas. The Project Area is located in LRMP Management Areas #8 and # 9. Specific growth-related policies of the LRMP in Management Area #8 are as follows:

- Limit expansion of resort capacity in Mammoth Lakes Basin to 10 percent above 1985 levels.
- Allow development of USFS lands where adequate water is available after natural resource needs are met.
- Satisfy municipal water supply needs after natural resources are met.

Growth-related policies that are applicable to Management Area #8, (a designated Concentrated Recreation Area under the LRMP), include the following:

Exchange USFS lands into the private sector for community expansion when: (1) the most appropriate use of the National Forest lands over the long term is in the private sector; (2) State, county, local, and USFS planning processes identify and support conveying ownership of the parcel from National Forest System status to the private sector; and (3) the use intended for the federal land being exchanged meets the intent of the current approved Community General Plan.

Allow no federal land exchanges north of State Route 203 within the Mammoth Lakes community.

Allow development on National Forest System land when it is clearly demonstrated that the infrastructure of a community can support the demands of the proposed development and benefits from development outweigh adverse impacts on the community.

- Allow development on National Forest System lands in the Mammoth/June area where adequate water is available after natural resource needs are met.

The Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative would modify the District's authorized POU to include several USFS campgrounds and lease cabins on USFS land that are now being served. None these uses is located within the District's authorized POU described under Permit 17332. Most of these 10 entities claim water rights in the Mammoth Creek watershed and,

historically, these customers supplied themselves with water using their own treatment systems. The District has been providing service to these customers to ensure compliance with California drinking water regulations. None of the prior water supplies for these sites was treated in accordance with CDPH standards. Because these sites are not presently located within the POU, the District's water rights must be modified to include these sites. Water service to these uses under the No Project Alternative could be discontinued.

Recreational uses that would continue to be served under the Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative include the following:

- **Mill City Tract Cabins**: Under a 1989 agreement, responsibility for delivering potable water to 14 seasonal residences in the Mill City Tract was transferred from the USFS to the District, in part due to increased water treatment requirements. The existing and expected future use of water by these 14 cabins is about 0.6 AF per year.
- **Twin Lakes Campground and Cabins**: The District has been serving treated water to the USFS Twin Lakes Campground, averaging approximately 1.0 AF per year. The campground is occupied approximately 4 months out of each year. Connection was requested into the District's system due to water treatment concerns over a spring supply.
- **Sherwin Creek Campground**: This USFS campground began receiving District water in 1973 pursuant to an agreement with the USFS. Responsibility for delivering potable water to these uses was transferred from the USFS to the District, in part due to increased water treatment requirements. Water use has averaged about 0.2 AF per year in recent years, and no additional use of water over and above historical use is expected. Under the agreement with the USFS, the District relied on a USFS claim of water right for its supply of water to the Sherwin Creek Campground.
- **Sierra Meadows/USFS Pack Offices**: Sierra Meadows and the USFS Pack Station began receiving District water in 1973 pursuant to an agreement with the USFS. Responsibility for delivering potable water to these uses was transferred from the USFS to the District, in part due to increased water treatment requirements. Water use has averaged about 1.2 AF annually in recent years, and no additional use of water over and above historical use is expected. Under the agreement with the USFS, the District relied on a USFS claim of water right for its supply of water to Sierra Meadows/USFS Pack Offices.
- **Mammoth Creek Park**: The District has been serving water to Mammoth Creek Park, a municipal park, since 1973 under the same agreement with the USFS as described above. The western portion of the park is owned by the Town of Mammoth Lakes, and located within the District's current POU. However, the less developed areas to the east of Old Mammoth Road are on leased USFS land, and are outside the current POU. Historical water use has averaged about 7.0 AF per year total for both areas. No additional use of water beyond historical use is expected, and the USFS no longer holds the water right previously used for Mammoth Creek Park.
- **YMCA of Metropolitan Los Angeles**: The District has been serving treated water to this summer camp since 2002 with deliveries averaging 1.2 AF per year. Connection was requested into the District's system due to water treatment concerns over a spring supply.
- **Mammoth Lakes Pack Station**: The District has been serving treated water to this pack station at an average of 1.0 AF per year. This pack station is occupied approximately 4

months out of each year. Connection was requested into the District's system due to water quality concerns related to a water supply originating in the Bodle Ditch.

- **Twin Lakes Art Gallery**: The District has been serving treated water to this small art gallery building, averaging approximately 0.04 AF per year. This gallery is occupied approximately 4 months out of each year. Connection was requested into the District's system due to water quality concerns related to a water supply originating in the Bodle Ditch.
- **Tamarack Lodge**: The District has been delivering about 7.8 AF per year to Tamarack Lodge, located on Twin Lakes, for the Lodge's year-round commercial use. The District began deliveries in response to concerns about treatment of the Lodge's Twin Lakes water supply. The Lodge's existing water right of 8,000 gpd, or about 0.01 cfs, would be transferred to the District; however, the District would not increase its diversions and would maintain this water for instream beneficial uses. No construction activities would occur as part of this action, and any future expansion of Tamarack Lodge would occur pursuant to the requirements of the Town of Mammoth Lakes and the USFS.
- **Shady Rest Park**: The District has been serving treated water to Shady Rest Park, a municipal park, since 1994. Recently, water use at Shady Rest Park has averaged about 8.9 AF per year. No additional use of water beyond historical use is expected. The park has also been identified as one of the three primary users of recycled water in the future.

The combined annual water demand from these uses is approximately 28.9 AF. No increase in demand over existing conditions is anticipated for any of these uses. Shady Rest Park has a higher annual demand of 8.9 AF, but has been identified as one of the District's three primary users of recycled water in the future. As all of these uses are existing customers of the MCWD, and future demand associated with Shady Rest Park is expected to be reduced with the use of recycled water, the change in POU would not increase demand compared to the Existing Condition. In addition, as these uses are already being served by the District, the Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative would not remove an impediment or induce population growth or development by the inclusion of these uses in the POU.

The Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative would be consistent with the applicable policies of the Inyo National Forest LRMP. As discussed in **Table 10-4,** below, the project alternatives would incorporate existing uses located on USFS lands in the POU. As these are on-going uses, the Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative would not remove obstacles for new development on USFS lands in Management Area #8. Any future USFS lands that would be developed in the Mammoth Management Area would occur in an urbanized area and would be designated for development under the current Town of Mammoth Lakes General Plan. Although water demand may increase under the General Plan, the project alternatives would not increase water supply for future development within the Mammoth Creek Basin. Therefore, the Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative would have no impact with respect to the growth policies of the LRMP. Because the No Project Alternative could result in the discontinuation of water service to these uses, it would have no impact with respect to growth.

Table 10-4. Comparison of the Project Alternatives to the Growth Policies of the Inyo National Forest Land and Resource Management Plan

Policies	Evaluation of Consistency
Mammoth Escarpment Management Area (Management Area #8)	
Limit expansion of resort capacity in Mammoth Lakes Basin to 10 percent above 1985 levels.	**Consistent.** The Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative would incorporate existing Inyo National Forest resort facilities in the POU, but would not provide water to any new or proposed resort development in Management Area #8.
Allow development of USFS lands where adequate water is available after natural resource needs are met.	**Consistent.** The Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative would provide water services to existing development in USFS lands, and would incorporate these facilities in the POU Permit. However, the POU and water supplies would not be expanded to support any new development in Management Area #8. The project alternatives would continue to meet natural resource needs before the needs of developed uses on USFS lands.
Manage water resources within the Mammoth Lakes Basin to provide adequate protection of natural resources, and to serve recreational demand along with water supply needs.	**Consistent.** The project alternatives would maintain existing required water levels in Lake Mary. The fishery bypass flow requirements under all project alternatives would support existing aquatic resources and riparian habitat. The reduction of water to Bodle Ditch, a man-made facility, may result in diminished riparian habitat in the area of the ditch. However, any existing natural springs and seeps in the ditch would not be affected.
Satisfy municipal water supply needs after natural resources are met.	**Consistent.** Existing and continued policy under all project alternatives requires that the District cease direct diversions and diversions to storage if the fishery bypass flow requirements are not being met.
Mammoth Management Area (Management Area #9)	
Allow development on National Forest System land when it is clearly demonstrated that the infrastructure of a community can support the demands of the proposed development and benefits from development outweigh adverse impacts on the community.	**Consistent.** Development on USFS lands in Management Area #9 would occur in an urbanized area under Town of Mammoth Lakes General Plan land use designations. Although water demand may increase under the General Plan, compared to existing conditions, the project alternatives would not contribute additional municipal water supply from the Mammoth Creek basin for future development.
Allow development on National Forest System lands in the Mammoth/June area where adequate water is available after natural resource needs are met.	**Consistent.** Development on USFS lands in Management Area #9 would occur in an urbanized area designated by the General Plan. Although water demand may increase under the General Plan, the project alternatives would not contribute additional water supply from the Mammoth Creek basin for future development. The project alternatives would continue to meet natural resource needs before the needs of developed uses on USFS lands.

10.3.3 MONO COUNTY

Growth in unincorporated Mono County is controlled by land use policies of the Mono County General Plan. A primary objective of the Mono County General Plan is to accommodate future growth in a manner that preserves and protects the area's scenic, agricultural, natural, cultural and recreational resources and that is consistent with the capacities of public facilities and services. The specific policy relative to the Mammoth area is to contain growth in and adjacent to existing developed areas (Objective B, Policy 1). No growth in private, unincorporated land

in the vicinity of Mammoth Creek is anticipated, although the Mono County General Plan provides a density of one unit per 40 acres on private lands in the Hot Springs area.

The project alternatives would not contribute to any new development or extend the POU to include new uses in unincorporated Mono County. Therefore, the project alternatives would be consistent with Objective B, Policy 1 to contain growth in and adjacent to existing developed areas. As the Proposed Project Alternative would not increase water supplies over existing allocations and would not extend services to any area of unincorporated Mono County that is not currently part of the District's service area, it would not induce growth in unincorporated Mono County.

10.3.4 PROJECT ALTERNATIVES

The four project alternatives would not exceed the maximum permitted diversion of 2,760 AF of water per calendar year from Lake Mary for use in the Town of Mammoth Lakes community. The Proposed Project Alternative, the Bypass Flow Requirements Alternative No. 2, and the Permit 17332 Bypass Flow Requirements Alternative would continue serving the ten existing customers on USFS land, as listed in the proposed amended POU. Since no increase would occur in the existing allocation from Lake Mary under any of the project alternatives, nor would any new customers outside the existing authorized or amended POU be added to the District's service area under any Project alternative, none of the project alternatives would induce growth.

10.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, Section 15126.2(c) states:

> *"Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."*

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses.
- The project would involve a large commitment of nonrenewable resources.
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project.
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Resources that will be permanently and continually consumed by project implementation include water, but the amount and rate of consumption of this resource would not result in significant environmental impacts related to the unnecessary, inefficient, or wasteful use of resources. In addition, there are no construction activities related to the proposed project.