



VIA HAND DELIVERY and EMAIL

May 11, 2022

Planning and Economic Development Commission

c/o: Town Clerk

clerk@townofmammothlakes.ca.gov

Re: **Comments on Tentative Tract Map (TTM) 22-002 "Limelight Hotel" and Addendum to the North Village Specific Plan EIR for a Modified Project with a Geothermal Well System**

MCWD was not consulted on the details of the proposed geothermal well system and only became aware of the details while reading the PEDC packet materials late last week. Only yesterday did we receive the report (The Limelight Hotel Geothermal Drilling Study dated June 8, 2021), which is the basis for the project, after a meeting with Town planning staff. The District's preliminary review of the materials gives raises significant concerns that the EIR Addendum does not adequately analyze the geothermal energy project or its potential impacts on the District water supply. Or that the use of an addendum is in compliance with the requirements of CEQA.

The proposed geothermal well system is only 1,200 feet from MCWD Well #17, a significant source of drinking water for the community. This project proposes to punch through the Town's water supply aquifer and pump and reinject geothermal brine from a deeper aquifer in fractured rock. It is imperative that this project be planned and developed in a way that ensures that the wells are constructed to minimize the risk of interference with the Town water supply aquifer. Mitigation measures and/or permit requirements must be in place to ensure non-interaction between the shallower drinking water aquifer and the deeper geothermal aquifer. However, the Addendum as written concludes, without any substantial evidence, that the project change will not impact the District's, and thus the Town's, water supplies in any manner and that no conditions or mitigation is required to ensure against any impacts from the construction and operation of the geothermal system.

As noted in Section 2.1, page 9 of the proposed Addendum, when an EIR has been certified for a project, no subsequent or supplemental environmental review documentation shall be required unless substantial changes are proposed in the project, which will require revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In this case, the project change involves a significant alteration in the project which involves risks to the entire town's water supplies by proposing an unconventional energy system to replace the standard electrical system connection provided by Southern California Edison. Without any analysis or evidence, the Addendum simply concludes that this significant change not only would not cause any impacts, but is not worthy of any analysis.

In addition, the new geothermal energy system proposed to be incorporated into the project requires that the applicant also apply for and acquire a geothermal well drilling and operation permit from the California Department of Conservation's Geologic Energy Management Division (CalGEM). The Addendum barely mentions this requirement. More important, the Addendum contains no analysis or

evidence that the applicant has even contacted CalGEM or obtained a permit. This is important because any permit issued by CalGEM may include conditions that should be at least acknowledged as a possibility and provisionally incorporated into the project's CEQA mitigation and monitoring plan.

In light of the above comments, the District believes that the Addendum is defective and violates CEQA. The District therefore requests that this item be continued to the next regular commission meeting to allow for the District to work with its consultants to adequately peer review the Geothermal Drilling Study and the EIR Addendum to develop more detailed comments. This time also will permit the District to discuss any concerns raised by the Limelight Hotel Geothermal Drilling Study and to coordinate with other permitting agencies, including CalGEM and the Town, to ensure that the proposed geothermal component of the project does not impact the District's water supplies used to serve the entire town.

Given the extremely short time frame in which the District was advised of this change in the Limelight Hotel project and the lack of information timely provided, the District reserves all rights to further develop and submit its comments and claims related to this project, both before and after any purported approval by the Commission.

Should you have any questions regarding this matter, please feel free to contact me at (760) 934-2596, extension 248.

Sincerely,

A handwritten signature in blue ink that reads "Garrett Higerd". The signature is fluid and cursive, with the first name "Garrett" and last name "Higerd" clearly distinguishable.

Garrett Higerd, PE
District Engineer