



Planning Department
168 North Edwards Street
Post Office Drawer L
Independence, California 93526

Phone: (760) 878-0263
FAX: (760) 872-2712
E-Mail: inyoplanning@inyocounty.us

FINAL MITIGATED NEGATIVE DECLARATION OF ENVIRONMENTAL IMPACT **AND INITIAL STUDY**

PROJECT TITLE: Tentative Parcel Map 422/ Zone Reclassification 2019-02/ General Plan Amendment 2019-01/CUP 2020-03 Olancha Lake RV

PROJECT LOCATION: The Project applicant is proposing to merge seven parcels in order to build an RV Resort situated on APNs 033-500-03, 033-500-04, 033-500-14, 033-500-15, 033-500-16, 033-500-17, and 033-080-37, owned by Olancha Lake LLC. The Project location is one-eighth of a mile east of Highway 395, adjacent to SR 190. The Project's total environmental footprint is approximately 80 acres.

PROJECT DESCRIPTION: The seven parcels combined by Tentative Parcel Map 422 (033-500-03, 033-500-04, 033-500-14, 033-500-15, 033-500-16, 033-500-17), and (033-080-37), will facilitate CUP 2020-03/Olancha Lake RV, which will develop a tent and RV camping business. The Project includes 30 tent-camping sites and 95 RV camping spots. The Project also includes 5 cabins for rental, a star gazing area for campers, an amphitheater, a tennis/basketball court, showers, a restaurant, a skateboarding area, a store, and kayaking rentals for use on Olancha Lake. CEQA analysis is necessary for the Inyo County Planning Commission to give final approval for the tentative parcel map, as well as Zone Reclassification 2019-02 and General Plan Amendment 2019-01. The proposed zone reclassification and general plan amendment are being requested, pursuant to the conditional use permit, in order to align the project property's land use designation with Commercial Recreation. The proposed project site would create recreational opportunities, such as kayaking and wind surfing on Olancha Lake, and cover 80.4 acres. Please note, that a draft Initial Study/Mitigated Negative Declaration was previously prepared for this project, and sent to the State Clearinghouse on March 30, 2020; however, Inyo County, as Lead Agency under CEQA, determined that the full build-out of the project was incomplete. A revised draft environmental document is being reissued for that reason. Please also note, Tentative Parcel Map 422, Zone Reclassification 2019-02, General Plan Amendment 2019-01, and Cup 2020-03 are considered the same project, under CEQA, as all of these actions are required by the Inyo County in order for the applicant to have a commercial use at this location.

FINDINGS:

A. The proposed project is consistent with goals and objectives of the Inyo County General Plan.

The proposed tentative parcel map, zone reclassification, and conditional use permit require CEQA review and approval from the Planning Commission: "Pursuant to Section 15022 of the State CEQA Guidelines, examples of projects that shall be subject to the requirements set forth in CEQA include but are not limited to: ... 2. Minor subdivisions (tentative parcel maps and the creation of lots by certificate of compliance" (15.20.010). The proposed zone reclassification necessitates a change to the General Plan land use designation from Rural Estate (RE) to Resort Recreational (REC), which will be reviewed for approval by the Inyo County Board of Supervisors). This project will require a General Plan Amendment to create zoning and land use consistency. The current designation of RE has a 5-acre per single-family home density requirement. The goal of this zone reclassification is to allow for the future use of a commercial recreational business. Section 4.2 of the Land Use Element, of the Inyo County

General Plan (pg. 4-19), identifies “recreational commercial uses, such as resorts, recreational facilities...campgrounds, trailer parks, restaurants” as uses that fall within the Resort Recreational (REC) designation. This section notes that the REC designation is well suited “toward tourist use,” and is therefore the best General Plan designation for the project.

- B. The proposed project is consistent with the provisions of the Inyo County Zoning Ordinance.

The proposed tentative parcel map (TPM 422) is required because there are “more than four lots involved in the lot line adjustment” and therefore “a re-subdivision tentative map application [is] required” (ICC 16.52.070). The proposed zone reclassification and General Plan Amendment would alter the zoning designation from Rural Residential (RR) and Light Industrial (M2) to Commercial Recreation (C5). The C5 designation aligns with the proposed General Plan Amendment and would allow for the applicant’s proposed land use of creating a recreational/resort business. The C5 designation allows campgrounds and mobile home parks, as a conditional use, following approval by the Inyo County Planning Commission (ICC 18.54.040). Concurrent to the zone reclassification, the conditional use permit will be consistent with the Inyo County Zoning Ordinance. The C5 zone includes within its purpose statement (ICC 18.54.010) that it is established for “commercially operated recreational activities, including resorts, lodges, motels, restaurants, general stores, campgrounds, mobilehome parks,” specifically oriented “to the traveler and tourist,” and this project is consistent with that purpose.

- C. Potential adverse environmental impacts will not exceed thresholds of significance, either individually or cumulatively.

The proposed 80-acre area is located on the southern tip of the Owens Dry Lake where US 395 meets SR 190, and is part of the Great Basin environmental and geomorphic province. The project is located on an alluvial fan characterized by desert scrub vegetation community. Environmental impacts to botanical and wildlife resources can be minimized and avoided. Based on information provided by the applicant, and staff review, Zone Reclassification 2019-02, GPA 2019-01, Tentative Parcel Map 422, and CUP 2020-03/Olancha Lake RV does not have the potential to cause environmental impacts that exceed thresholds of significance, either individually or cumulatively.

- D. Based upon the environmental evaluation of the proposed project, the Planning Department finds that the project does not have the potential to create a significant adverse impact on flora or fauna; natural, scenic and historic resources; the local economy; public health, safety, and welfare. This constitutes a Mitigated Negative Finding for the Mandatory Findings required by Section 15065 of the CEQA Guidelines.

Avoidance and minimization measures will be designed into the project, as conditions of approval for the proposed future commercial tent & RV camping resort, in the following ways:

Biological Resources: Botanical surveys shall be conducted for plants with blooming seasons outside the previous survey period (July 2019 & May 2020). These field surveys shall follow protocols set forth in the ‘Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities’ (CDFW 2018). As the Project has potential to support special-status species protected by federal and state laws [Fish & Game Code, §§ 711.7 (a) & 1802; PRC § 21070; CEQA Guidelines § 15386 (a), PRC § 21069; CEQA Guidelines, § 15381; Endangered Species Act Section 7(a)(2)], the applicant shall coordinate with CDFW & USFWS on the following surveys and provide the County with CDFW/USFWS’ letter of compliance prior to construction:

- Mohave Ground Squirrel (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83975&inline>)
- Desert Tortoise

(https://www.fws.gov/nevada/desert_tortoise/documents/manuals/Mojave%20Desert%20Tortoise_Pre-project%20Survey%20Protocol_2017.pdf)

- Plant & Natural Communities (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>)

The applicant shall conduct focused pre-construction surveys on all suitable nesting habitats within the Project area, no more than three (3) days prior to vegetation clearing or ground disturbance activities, and provide the County Planning Department with the survey report and findings before any ground disturbing activities.

Water Quality/Stormwater: The applicant shall work with the Inyo Environmental Health Department, Lahontan Regional Water Quality Control Board, and the California Housing Community Development Department to ensure that all permitting and regulations, both County and State, are met for the project's proposed wells and septic systems.

Noise: The camping site will post and enforce a set of rules, which include instructions regarding appropriate noise levels & quiet hours.

Transportation & Traffic: The applicant shall obtain a Caltrans encroachment permit and adhere to the requirements therein.

The public & State agency review period for this Draft Mitigated Negative Declaration closed on September 21, 2020. Inyo County received comments from the Lahontan Regional Water Quality Control Board and California Department of Fish & Wildlife on September 2, 2020. The document has been modified to address these concerns.

Additional information is available from the Inyo County Planning Department. Please contact Project Planner Steve Karamitros (760-878-0268) if you have any questions regarding this project.



Steve Karamitros
Senior Planner, Inyo County Planning Department

10/20/20

Date

INYO COUNTY PLANNING DEPARTMENT

CEQA APPENDIX G: INITIAL STUDY & ENVIRONMENTAL CHECKLIST FORM

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “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 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. “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. 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
- b) the mitigation measure identified, if any, to reduce the impact to less than significance issues.



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INYO COUNTY PLANNING DEPARTMENT

APPENDIX G: CEQA INITIAL STUDY & ENVIRONMENTAL CHECKLIST FORM

- 1. Project title:** Tentative Parcel Map 422; Zone Reclassification 2019-02; General Plan Amendment 2019-01; Conditional Use Permit 2020-03/Olancha Lake RV
- 2. Lead agency name and address:** Inyo County Planning Department, 168 N. Edwards St., P.O. Drawer L, Independence, CA 93526
- 3. Contact person and phone number:** Steve Karamitros, Senior Planner, (760) 878-0268
- 4. Project location:** The proposed project is located on the southern tip of the Owens Dry Lake where US 395 meets SR 190, immediately southeast of the unincorporated community of Olancha, CA and can be accessed by both US-395 & SR 190. The proposed project is to be located on 80-acres of private land owned by Olancha Lake, LLC with the Assessor's Parcel Numbers: 033-500-03, 033-500-04, 033-500-14, 033-500-15, 033-500-16, 033-500-17, 033-080-37.
- 5. Project sponsor's name and address:** Leedy Ying (Olancha Lake, LLC), 12550 Whittier Blvd, Whittier, CA 90602.
- 6. General Plan designation:** Residential Estate (RE) & Light Industrial
- 7. Zoning:** Rural Residential/Mobile Home Combined (RMH) & Light Industrial (M2)
- 8. Description of project:** The Project would develop an RV and tent camping business that includes 30 tent-camping sites and 95 RV camping spots, along with other services on site. This includes 5 cabins for rental, a star gazing area for campers, an amphitheater, a tennis/basketball court, showers, a restaurant, a skateboarding area, a store, and kayaking rentals for use on Olancha Lake. The lake will be filled and reserved for swimming, kayaking, and stand up surf boarding. Three preexisting, permitted wells will supply water for domestic use and to fill the lake. The project site is located on seven, privately owned, parcels, totaling approximately 80.50 acres.
- 9. Surrounding land uses and setting:** Briefly describe the project's surroundings:
The property is surrounded primarily by undeveloped land consisting of desert scrub. The property to the west is zoned General Industrial (M1), with commercially zoned areas generally located to the west along US 395. Properties to the north and south are also zoned Rural Residential, with Open Space to the east. The closest developed area is the community Olancha, approximately 0.25-miles to the west.

Location:	Use:	Gen. Plan Designation	Zoning
West	vacant & developed private property	Rural Protection (RP); Rural Residential Medium Density (RRM)	General Industrial (M1); (C1); Highway Services & Tourist Commercial (C2)
North	Vacant private property	Residential Estate (RE)	Rural Residential/Mobile Home (RR-MH)
East	Vacant private property	Rural Protection (RP)	Open Space-40 acre minimum (OS-40)
South	Vacant private property	Residential Estate (RE)	Rural Residential/Mobile Home (RR-MH)

10. Other public agencies whose approval is required: Inyo County Departments of Environmental Health, Building & Safety, and Public Works, the Olancho-Cartago Fire Department; California Department of Fish & Wildlife; Lahontan Regional Water Quality Board, Great Basin Pollution Control District. California Department of Transportation, District 9.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

In compliance with AB 52, SB 18, and Public Resource Code Section 21080.3.1(b), tribes identified as being local to Inyo County, were notified via a certified letter on October 31, 2019 about the project and the opportunity for consultation on this project. The tribes notified were as follows: the Twenty-Nine Palms Band of Mission Indians, the Big Pine Paiute Tribe, the Bishop Paiute Tribe, the Fort Independence Paiute Tribe, Lone Pine Paiute-Shoshone Tribe, the Timbisha Shoshone Tribe, and the Cabazon Band of the Mission Indians.

Inyo County did not receive any requests for consultation.

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 Resources	<input type="checkbox"/> Agriculture & Forestry	<input type="checkbox"/> Air Quality
<input checked="" type="checkbox"/> Biological Resources	<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Geology /Soils
<input type="checkbox"/> Hazards & Hazardous Materials	<input checked="" 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 checked="" type="checkbox"/> Transportation/Traffic
<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Utilities/Service Systems	<input type="checkbox"/> Mandatory Findings of Significance
	<input type="checkbox"/> Tribal Cultural Resources	

DETERMINATION: (To be completed by the Lead Agency) 0238

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 project proponent. 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.



Steve Karamitros, Senior Planner
Inyo County Planning Department

10/20/20

Date

INYO COUNTY PLANNING DEPARTMENT ENVIRONMENTAL CHECKLIST FORM

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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I. AESTHETICS -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

No, the proposed project is surrounded by properties zoned Open Space and General Industrial, and Commercial. The industrial property directly west of the Project already has buildings that disrupt the views, from west to east, to the traveling public on US 395. Moreover, the industrial properties to the west have building height allowances up to 35 feet. The proposed project would have height limitations of twenty-five feet (accessory buildings) to thirty feet (principal buildings). As most viewer groups would be motorists traveling along US-395, the buildings/structures on the proposed RV Park would be shielded by the industrial and commercial uses closer to the highway, concealing the visual footprint. Views to the hills located east of the proposed project would also not be obstructed from travelers on US-395.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No, the proposed site will not impact scenic resources, as the land east of US-395 is characterized by tan colored soil with low-lying tan/green scrub to create a stark homogenous desert landscape. Views of the Eastern Sierras, located west of the project, will not be affected. It should also be noted that the hills located to the east are scarred with old roads and mines and do not offer significant scenic resources.

c) In non-urbanized areas, substantially degrade the existing visual character quality of the site and its surroundings?
(Public views are those that are experience from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No, although tents and parked RVs would be visible from SR-190 and US 395, the location and surrounding area of the proposed project are currently covered in desert scrub. There are no significant scenic resources in the area to impact; therefore, the proposed project will not substantially degrade the existing visual character or quality of the site or its surroundings.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The location of the proposed project area has few receptors that would be impacted by the project. The owner or his agent shall adhere to Inyo County's General Plan Visual Resources requirement (VIS-1.6-Control of Light & Glare), which requires all outdoor light fixtures including street lighting, externally illuminated signs, advertising displays, and billboards use low-energy, shielded light fixtures which direct light downward (i.e., lighting shall not emit higher than a horizontal level) and are fully shielded.

II. AGRICULTURE AND FOREST RESOURCES: 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

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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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:

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 of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the project does not convert prime farmland, unique farmland, or farmland of Statewide importance to non-agricultural use and is in fact, an agriculture use.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, there are no conflicts with zoning for agriculture nor will the project cause rezoning of Forest Land. There are no Williamson Act Contracts in Inyo County. The project is for recreational uses, in contrast to the current residential land use. No agricultural land is being affected.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the proposed project site does not include forest land or timber land.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the proposed project site will not affect forested land or impact any land use designated for that purpose.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the proposed project site does not currently contain Farmland.

III. AIR QUALITY: 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. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the project will be required to follow best management practices for dust control during construction-related activities.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the proposed project will be in compliance with current air quality standards.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

No, there will be short-term construction equipment impacts from dust and exhaust emissions, but the Great Basin Unified Air Pollution Control District considers these construction emissions to be less than significant. Although there are portions of Inyo County within non-attainment areas for Federal and State PM10 (particulate matter 10 microns or less in diameter) ambient air quality standards, the primary source for this pollution is the Owens dry lake, located approximately one mile north of the project site. The temporary nature of the construction and best practices for dust control and emissions being followed during construction will cause the project to be less than significant.

d) Expose sensitive receptors to substantial pollutant concentrations?

No, existing sensitive receptors consist of scattered residences to the west of US 396, the closest being approximately 650-feet away. There are no hospitals or other non-residence sensitive receptors in the area. The business will offer camping sites, with additional recreational uses on an artificial lake, neither of which will produce air pollutants. The business operation is in a rural area where traffic volumes from guests to the project site will be negligible.

e) Create objectionable odors affecting a substantial number of people?

No, the proposed project will not produce objectionable odors during the life of the operation. The project will naturally result in odors from portable toilets, but these facilities will not affect local residents. There are no schools or sensitive receptors in the area. The closest school is in Lone Pine, over 22 miles to the north.

IV. BIOLOGICAL RESOURCES: Would the project:

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?

The Project has the potential to impact one identified special-status species classified as native and rare in California, Polemoniaceae (Eriastrum sparsiflorum) commonly known as the Great Basin Wollystar. Biological analysis was conducted by applicant-supplied biologists with, Geode Environmental, Inc. (Geode). The consultant's study method included a literature review (to determine locations for special status plant and animal species that have been reported from the vicinity of the subject property); and, field surveys that followed the presence-absence survey protocol revised by USFWS in 2017. The following databases were used to identify the required protocols for special status flora and fauna: USFWS Species List, CNDDDB list for the region where the Project occurs, and CNPS list for the region where the Project occurs. In addition, the following field guides were used to aid the field review: Mojave Desert Wildflowers, 2nd: A Field Guide to Wildflowers, Trees, and Shrubs of the Mojave Desert, Including the Mojave National Preserve, Death Valley National Park, and Joshua Tree National Park. By Pam MacKay (2013); and Wildflowers of the Eastern Sierra and Adjoining Mojave Desert and Great Basin. Laird R. Blackwell (2002).

On July 23, 2019, the consultants surveyed the project site action area for six of the seven parcels included in the proposed project (033-500-03, 033-500-04, 033-500-14, 033-500-15, 033-500-16, 033-500-17). After the applicant added an additional parcel to the project proposal (033-080-37), the consultant surveyed this additional site on May 10, 2020. The surveys were completed to determine the presence of special status botanical and wildlife species. This entailed a comprehensive north-south transect pattern, with parallel transects traversed along a north-south axis. During the July 2019 surveys, 34 plant species were identified, of which four were invasive/non-native and one was classified as native and rare in California, Polemoniaceae (Eriastrum sparsiflorum), commonly known as the Great Basin Wollystar. CNPS' Calscape database classifies Eriastrum sparsiflorum, commonly known as the Great Basin Wollystar, as rare. This annual plant in the phlox family grows in Great Basin of the western United States and blooms from May-September. During the May 2020 surveys, two botanical species, Booth's evening-primrose (Eremothera boothii) and Polemoniaceae (Eriastrum sparsiflorum), were identified as having limited distribution in California. One plant species, Parish's popcorn flower (Plagiobothrys parishii), was classified as rare, endemic, and seriously endangered in California. Only sixteen individuals of this species were identified. Collectively, these findings are classified below the threshold of significance for biological impacts per CEQA.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Botanical surveys shall be conducted for plants with blooming seasons outside the previous survey period (July 2019 & May 2020). These field surveys shall follow protocols set forth in the 'Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities' (CDFW 2018). As the Project has potential to support special-status species protected by federal and state laws [Fish & Game Code, §§ 711.7 (a) & 1802; PRC § 21070; CEQA Guidelines § 15386 (a), PRC § 21069; CEQA Guidelines, § 15381; Endangered Species Act Section 7(a)(2)], the applicant shall coordinate with CDFW & USFWS on the following surveys and provide the County with CDFW/USFWS' letter of compliance prior to construction:

- Mohave Ground Squirrel (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83975&inline>)
- Desert Tortoise (https://www.fws.gov/nevada/desert_tortoise/documents/manuals/Mojave%20Desert%20Tortoise_Pre-project%20Survey%20Protocol_2017.pdf)
- Plant & Natural Communities (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>)

The applicant shall conduct focused pre-construction surveys on all suitable nesting habitats within the Project area, no more than three (3) days prior to vegetation clearing or ground disturbance activities, and provide the County Planning Department with the survey report and findings before any ground disturbing activities.

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 US Fish and Wildlife Service?

The Project may impact some constituent species found within the Great Basin Cool Semi-Desert Alkali Basin and Lower Bajada and Fan Mojavean-Sonoran Desert Scrub sensitive natural communities. The Project is characterized by the desert scrub vegetation community; specifically, the flora in the area surveyed is predominantly rabbitbrush (Ericameria nauseosus). In general, this desert scrub vegetation community incorporates shadscale (Atriplex confertifolia), big sagebrush (Artemisia tridentata), bud sagebrush (Artemisia spinescens), greasewood (Sarcobatus vermiculatus), Nevada ephedra (Ephedra nevadensis), and spiny hopsage (Grayia spinosa). Impacts to these communities are less than significant given the context and adjacent environment of the Project.

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?

No, there are no identified wetlands on the project site or in close proximity, that would be affected by the project.

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 native wildlife nursery sites?

This Project is located outside of NOAA Fisheries jurisdiction; therefore, a NOAA Fisheries species list is not required. No effects to NOAA Fisheries species are anticipated. Trappings and CDFW protocols for special-status animals, particularly for Mohave ground squirrel, shall be followed to determine their presence or absence, as their range falls within the Project footprint. Preconstruction bird nesting surveys shall be conducted to confirm their absence.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No, the proposed project site is not within an area with special local policies or ordinances related to it.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No, the proposed project does not conflict with any local, regional, or state habitat conservation plan.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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V. CULTURAL RESOURCES: Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

A "historical resource" is a resource listed, or determined to be eligible for listing, in the California Register of Historical Resources (Title 14 CCR §15064.5(a)(1)-(3)). Historical resources may include, but are not limited to, "any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC §5020.1(j)). To initiate the Project site investigation, a cultural resources records search was conducted through the California Historic Resources Information System (CHRIS) at the Eastern Information Center (EIC) housed at the University of California, Riverside. The archival and digital materials were obtained from the EIC on July 30, 2019. The records search queried the CHRIS database for previously documented cultural resource sites and surveys within the Tribal-mandated one-mile buffer of the Project footprint. The search included a review of all recorded prehistoric/historic archaeological resources, built-environment resources, and the following directories: The California Points of Historical Interest (CPHI), California Historical Landmarks (CHL), California Register of Historical Resources (CALREG), National Register of Historic Places (NRHP), and California State Historic Properties Directory (CHPD). None of the 98 cultural resource sites identified occur within the Project footprint. Following the addition one parcel in Spring 2020 (APN: 033-080-37), the previous database searches were reviewed and no cultural resources were identified.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

No, the Project will not cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5. No archaeological resources have been identified in any records of the site or immediate surrounding area. The Project investigations and pedestrian surveys were conducted by Dr. Alan Garfinkel Gold, RPA on August 11th and 12th, 2019, when six parcels of the Project area were traversed on foot (APNs: 033-500-03, 033-500-04, 033-500-14, 033-500-15, 033-500-16, and 033-500-17). The ground surface area visibility varied throughout the Project. A man-made lake runs diagonally from the northwest corner to the southeast corner of the parcel. Submerged areas were not examined due to the severity of disturbance and manmade construction. Areas of close examination entailed visible ground surface, rodent back-dirt piles, areas of original ground, and all elements of subsurface ground. Pedestrian transects were spaced 10 meters apart and the terrain was crossed on foot in a north-south direction. Approximately 80% of the Project area was traversed on foot. Two isolates were discovered in the northeast half of the Project. The first was an obsidian biface fragment and the other a piece of obsidian core shatter. No other associated cultural material was recognized. No prehistoric or historic archaeological sites were identified and no significant historic structures were recognized. The two obsidian-flaked stone artifacts were recorded as isolates. Single finds of obsidian flaked stone are common in the Great Basin. Isolates are not deemed significant resources, and their documentation here as isolates is sufficient recordation.

An additional parcel (033-080-37) was added to the Project subsequent to the August 2019 record search and surveys. On May 15, 2020, this parcel was surveyed, by the same archaeologist, using the same protocols as those used for the August 2019 surveys. One prehistoric site was identified during this survey; however, only nine obsidian flakes were identified and no flakes displayed cortex. No other artifacts or evidence of anthropogenic soils (midden) were observed in the site area, the roadway, or the adjacent road berms. Due to the highly disturbed nature of the site, this site has no integrity and no significance under the criteria set forth under the California Register of Historical Resources [Public Resource Code 5024.1(c)]. As a result, it is neither a unique archaeological resource nor a historical resource, and therefore does not warrant further evaluation or mitigation per CEQA 15064.5(c)(4). No additional prehistoric or historic archaeological sites and no significant historic structural-remains were identified as a result of this investigation.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

No known human remains or burial sites are on the property. Refer to the response to V b) for the potential for archaeological resources. While unlikely, human remains are a potential archaeological resource, and will be handled similar to other archaeological resources. If human remains are encountered during the undertaking, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of the origin and disposition of the remains pursuant to Public Resources Code Section 5097.98. The County Coroner must also be notified immediately of the find. If the remains are determined to be of prehistoric or protohistoric Native American origin, the Coroner will notify the Native American Heritage Commission (NAHC). The NAHC shall determine and notify a Most Likely Descendant (MLD) individual or group that will consult with a qualified archaeologist and recommend the manner of treatment for any human remains and

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associated burial offerings. With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.

VI. ENERGY: Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

No, the project will have short-term construction-related impacts, during grading, site preparation, and construction on the project site.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency

No, the proposed future use of this project as a resort RV-tent campground does not conflict with state or local energy policy.

VII. GEOLOGY AND SOILS: Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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.

The project is adjacent to the Sierra Nevada fault. The applicant shall work with the Inyo County Department of Building and Safety to implement the proper structural specifications for the Project's built structures (cabins and caretaker facilities).

ii) Strong seismic ground shaking?

The California Building Code ensures that structures be built according to required seismic standards, designed to withstand such events, so this potential impact is considered less than significant.

iii) Seismic-related ground failure, including liquefaction?

The Project is within the Great Basin geomorphic province, with a range landform pattern and a topography consisting of north-south trending mountain ranges separated by fault-bounded valleys. Soils in the Project area are primarily Typic Psammaquents with small amounts of Playa and Arizo-Yellowrock complex. Potential ground failure remains low in areas of exposed or shallow bedrock; however, proposed project structures could be potentially damaged if built over certain alluvial areas. As part of Inyo County Building and Safety Code, an engineer will assess the site and determine if a soils report is necessary to avoid ground failure impacts to the built structures.

iv) Landslides?

The project area exhibit primarily level topography, with the preexisting buildings that have a slope of less than five percent. Steeper natural or manufactured slopes subject to landslides and other types of slope failure are not expected to occur within the project area.

b) Result in substantial soil erosion or the loss of topsoil?

The proposed project will result in the disturbance of soil due to pre-construction grading. Future development will require compliance with the California Building Standards that require Best Management Practices be implemented to minimize erosion and keep all site materials from leaving the site, and therefore, no soil erosion or loss of topsoil is anticipated.

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

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spreading, subsidence, liquefaction or collapse?

No, the project properties are not located on a geologic unit or soil that is unstable. The Project's potential for compressible or collapsible soils will be reviewed by Inyo County's Building and Safety Department. It may be determined that a soil report is necessary, as part of building design, to avoid these impacts. If any questions arise about the quality of the soil during the development of the property, the applicant/developer shall work with Inyo County's Building and Safety Department to implement the proper design standards.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

No, the proposed project is not located in an area with a known expansive soil type. If any questions arise about the quality of the soil during the development of the property, the applicant/developer shall work with Inyo County's Building and Safety Department to employ the proper design standards.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Soils are compatible with septic tanks and other waste water disposal systems. The applicant is currently working with Inyo County Department of Environmental Health to design the septic system for the rental cabins & caretaker facility, as well as the portable toilet system for the tent-camping area. The RV camping area will not provide septic hookups.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
 The project will not impact any paleontological resources.

VIII. GREENHOUSE GAS EMISSIONS:

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

No, the RV resort will not generate greenhouse gas emissions that will have a significant impact. Temporary construction-related emissions will occur, but such dust related impacts will be minimized through best management practices.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No, the proposed project will not cause conflicts with a plan, policy or regulation adopted for the purpose of reducing greenhouse gasses.

IX. HAZARDS AND HAZARDOUS MATERIALS:

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

No, the Project will produce a solid waste from commercial services (restaurant) and RV/tent camping. There will also be human waste generated from the cabin rentals' septic system as well as the campsites' portable toilets. A waste management company has been contracted to haul away solid waste & a septic company has been contracted to maintain and empty the Project's septic system. The septic system and portable toilets will comply with the standards set by the Inyo County Environmental Health Department. Grease traps for the restaurant will also be installed.

b) Create a significant hazard to the public or the

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environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

No, the nature of the proposed project will not create significant hazards to either the public or the environment.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No, the proposed project is not within one-quarter mile of an existing or proposed school, nor will it emit hazardous emissions, or handle acutely hazardous materials, substances or waste.

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?

No, the proposed project is not located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. There are no DTSC sites mapped within or adjacent to the project area and no additional sites are identified in the site vicinity on Geotracker and EnviroStor databases (SWRCB 2014, DTCS, 2014).

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?

The project is not located within an airport land use plan or near a public airport.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No, neither the proposed recreational use, nor the project location, interfere with an adopted emergency response plan or evacuation plan.

g) 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?

No, the proposed project is not located in the vicinity of a private airstrip and poses no danger to anyone working at the proposed project site.

X. HYDROLOGY AND WATER QUALITY: Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

No, the applicant will work with Inyo County Environmental Health Department and the Lahontan Regional Water Quality Control Board to identify the project's applicable water quality standards, any possible violation of these standards, and a process for bringing possible impacts below a level of significance. Prior to project construction, the applicant shall work with Inyo Environmental Health & the Lahontan Regional Water Quality Board to determine if any of the following permits are required for the Project: a Clean Water Act (CWA) Section 402 Permit [including National Pollutant Discharge Elimination System (NPDES) coverage], from the State Water Board; a section 401 water quality certification; possible water diversion and/or dewatering permits (NPDES General Permit, Limited Threat to Discharges to Surface Water, etc.); and approval under the County's Local Agency Management Program (LAMP) for discharge of domestic wastewater using onsite wastewater treatment systems. A septic system will be required for the site and the applicant is working with Inyo County's Environmental Health Department to determine the estimated

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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flow, design flow, septic tank sizes, septage disposal plans, etc. to minimize any potential impacts to hydrology and water quality resources.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Ground water pumping will occur at the facility using pre-existing wells, and water use will be focused primarily in filling and maintaining the Olancha Lake. Water will also be made available to tent and RV campers. Filling the lake will require roughly 10 acre feet. The applicant shall work with Inyo County Environmental Health to limit the effects of septic system discharges on receiving groundwater quality

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in a substantial erosion or siltation on- or off-site;
The project will not result in erosion or siltation on or off site. Landscape design using local native plants may help reduce long-term soil erosion.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
The project is not anticipated to generate substantial additional surface flows. Impacts related to capacity of existing or planned storm drain systems are expected to be less than significant. Pre-and post-development runoff rates and related effects to storm drain systems will be evaluated during the construction design phase of the project and drainage plans based on regulatory requirements and best management practices will be required from the applicant during the construction of the project to the satisfaction of the Inyo County Public Works and Building a Safety Departments.

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
Potential impacts related to flood hazards for the area are less than significant, based on the fact that no mapped FEMA 100-year floodplains are located within the vicinity of the proposed project location, also any water that might runoff of the project site would end up in the Haiwee reservoir.

iv) impede or redirect flood flows?
No drainage patterns will be altered by this project. Surface drainage flow is predominantly to the east terminating at the Haiwee reservoir through a number of small unnamed ephemeral washes. Grading and drainage plans based on regulatory requirements and best management practices will be required by Inyo County Departments of Building & Safety and Public Works, from the applicant, during the construction of the project to the satisfaction of the Inyo County Public Works and Building a Safety Departments. No fill material will be added to any streams or water lines.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
No, the proposed project site is not in an area subject to seiches, tsunamis, or mudflows.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?
The project will not conflict with or obstruct any water control or groundwater management plans for the area.

XI. LAND USE AND PLANNING: Would the project:

a) Physically divide an established community?

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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No, the proposed project does not physically divide an established community.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the applicant is requesting a zone reclassification, in order to create a commercial RV-tent-camping business, which is required by the County's zoning code. The project site is currently zoned Rural Residential & Light Industrial. The applicant is requesting a zone change to Commercial Recreation, and a General Plan amendment to Resort Recreational. These changes & amendments will allow a Project that conforms to the proper local land use designation. The Project will be designed to meet the required parking-to-usable-public-floor-space ratios, as required by Inyo County Code 18.54.050(3).

XII. 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"/>
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No, the project makes use of underdeveloped land and no known mineral resources are located on it. No extraction of mineral resources is being foregone by this project.

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"/>
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There are no locally-important mineral resources being foregone as a result of this project.

XIII. NOISE: Would the project result in the:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project 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"/>
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No, there will be some construction related noise from grading activities, engine noise from trucks, and building construction. This noise will not likely exceed already present noise caused by US-395 that borders the entire west edge of the project vicinity. Also, Occupational Safety and Health Administration (OSHA) allows for decibels of 90 for an 8 hour day and 100 for a limit of 2 hours. Effects to sensitive receptors will be minimized with construction during daytime business hours. The camping site will post and enforce a set of rules, which include instructions regarding appropriate noise levels & quiet hours.

b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, exposure to noise levels will be primarily airborne, and groundborne vibrations if any would be brief.

c) For a project located within the vicinity of a private airstrip or, 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"/>
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No, the project is not located within the vicinity of a private airstrip, airport land use plan, or anywhere near where such a plan has been adopted. Noise levels will be minimal due to the nature of the project. Ambient noise will not exceed the noise already present in the vicinity from US-395 or from the bridge-building warehouse and materials site. Noise from maintenance will be minimal and infrequent. Noise from patrons in RVs and tent camping areas will be regulated by posted rules that minimize excessive noise and set quiet hours to which campers will adhere. .

XIV. POPULATION AND HOUSING -- Would the project:

a) Induce substantial population growth in an area,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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the environment?

No, the proposed project is itself a recreational facility. Native revegetation with native plants and the use of an artificial lake may enhance habitat for botanical and wildlife species over time.

XVII. TRANSPORTATION -- Would the project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

No, the proposed project is not conflictual with any County plan, ordinance, or policy; nor is it conflictual with the County's Circulation Element of the General Plan. The project will not cause a significant increase the existing traffic load. The Project is abuts US-395 and will be accessed by a road that connects to the Highway. Visitor and staff vehicles entering and exiting the project will not put undue burden the existing transportation facilities. The applicant is currently working with the Department of Transportation (Caltrans, District 9) to obtain the necessary encroachment permits for access to the site via US 395. The applicant shall obtain a Caltrans encroachment permit and adhere to the requirements therein.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

No, the projects is within one-half mile of two high quality transit corridors (US 395 & SR 190) and will have less than significant impact to transportation facilities..

c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed project will not result in any design features for transportation that increase hazard. Autos and trucks will be accommodated on a parking lot on the project site.

d) Result in inadequate emergency access?

No, proof of access for emergency vehicles will be required as part of the project design. Emergency access and turn radius are required for emergency vehicle access.

XVIII. TRIBAL CULTURAL RESOURCES -- Would the project:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

A "historical resource" is a resource listed, or determined to be eligible for listing, in the California Register of Historical Resources (Title 14 CCR §15064.5(a)(1)-(3)). Historical resources may include, but are not limited to, "any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC §5020.1(j)). None of the 98 cultural resource sites identified in the data search for the Project occurred within the footprint of the project. Furthermore, no prehistoric or historic archaeological sites were identified and no significant historic structures were recognized. The Project does not encompass a resource eligible for listing in the California Register of Historical Resources, or in a local register or historical resources as defined in Public Resource Code section 5020.1(k). If any archaeological or cultural resources are discovered on the site, work shall stop and Inyo County staff shall be immediately notified per Chapter 9.52, Disturbance of Archaeological, Paleontological and Historical Features of the Inyo County Code.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the proposed project does not encompass a resource determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of the Public Resource Code section 5024.1. See also the response to XVII a)

XIX UTILITIES AND SERVICE SYSTEMS --

Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project's current design plan includes design flows for three new septic systems, and none of the flows exceed the 10,000 gallons per day limit, detailed in Inyo County's Local Area Management Plan. The septic tank size is based on a design flow of 100 gallons per day per RV, per the California Plumbing Code, with a factor of safety of 2. The leach bed size is based on the design flow and application areas. The proposed project will be built in conformity to the standards set by the Inyo County Department of Environmental Health, as well as the Lahontan Regional Water Quality Control Board.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The RV Park and campground must be approved and permitted by the California Housing & Community Development (HCD) prior to Inyo County issuing a water supply permit. The project applicant shall apply for a Public Water Supply Permit and obtain approval from the Inyo County Environmental Health Department, to operate a public water system, per the California Safe Drinking Water Act, prior to operation of the water system. Inyo County Environmental Health Department shall review the complete as-built schematic plans of existing water and onsite septic components, along with the proposed facilities to be constructed or remodeled in the future. The public water system permit application shall include, but is not be limited to: Technical Managerial and Financial (TMF) Capacity assessment; technical/feasibility report (SB 1263), for potential consolidation with another public water system instead of creating a new public water system; water system component data sheets providing descriptions of wells, water treatment, storage tanks, piping, and valving; a schematic map showing water system components, service connections, septic system/sewer lines, fuel tanks and appurtenances, livestock enclosures, and any other potential contaminating activities on the parcel and adjacent parcels; and operation and maintenance plan, including emergency disinfection plan. The applicant shall work with the Inyo County Environmental Health Department, Lahontan Regional Water Quality Board, California Housing & Community Development Department, and the State Water Board to ensure that water supply resources are sufficient and that resources are accessed properly.

c) 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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The Project will not place undue burdens any wastewater treatment provider. Because of past history of extremely high ground water on this site, preexisting septic systems and the potential use of RV septage additives, this project's septic system shall be reviewed and approved by Lahontan Regional Water Board, prior to review or approved by the Inyo Environmental Health Department.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project will not create a need for additional solid waste capacity. Solid waste will be collected and recycled by a commercial waste hauler; and, the septic system will be maintained, and waste hauled off-site, by a commercial septic company.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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e) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The Project will comply with Inyo County's solid waste standards, as required by the Inyo County Department of Environmental Health.

XX. WILDFIRE:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Any project construction will be reviewed by the Inyo County Department of Building & Safety, to ensure minimum fire safety standards related to defensible space that are applicable to state responsibility area lands under the authority of the department, and to lands classified and designated as very high fire hazard severity zones, as defined in subdivision (i) of Section 51177 of the Government Code. These regulations apply to the perimeters and access to commercial and residential building construction lands classified and designated as very high fire hazard severity zones. The above regulations apply to the placement of mobile homes as defined by National Fire Protection Association standards.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The applicant will adhere to the Inyo County Building & Safety, Cal Fire, and local fire jurisdiction's standards regarding defensible spaces. These departments will also advise on regionally appropriate vegetation management, that preserve and restore native species that are fire resistant or drought tolerant, or both, minimize erosion, minimize water consumption, and permit trees near homes for shade, aesthetics, and habitat; and suggestions to minimize or eliminate the risk of flammability of non-vegetative sources of combustion, and provide guidance related to campfires.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project applicant will work with the Inyo County Building & Safety Department, and the state Fire Marshall, to determine to what extent the following are needed: road standards for fire equipment access; standards for signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; fuel breaks and greenbelts.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The applicant is producing a Tentative & Final Parcel Map for the merging of the project's seven parcels. The maps depict widths, approximate grades of all highways, streets and ways within the proposed division of land; locations of all existing or proposed easements, whether public or private, for roads, drainage, sewage and public utility purposes; and the approximate boundaries of all areas subject to inundation or stormwater overflow and the locations, widths and directions of flow of all watercourses. The applicant will be working with the Inyo County Departments of Building & Safety and Public Works to ensure that there are no risks to the visiting public resulting from downslope flooding, post-fire slope instability, or drainage changes.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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No, the project will not impact or degrade the quality of the environment. Project design will limit any impacts to resources to less than significant. Avoidance and minimization measures shall be written into the Conditions of Approval for this project's conditional use permit, zone reclassification, and General Plan Amendment in the following ways: Light & Glare: the owner or his agent shall adhere to Inyo County's General Plan Visual Resources requirement (VIS-1.6-Control of Light & Glare), which requires all outdoor light fixtures including street lighting, externally illuminated signs, advertising displays, and billboards use low-energy, shielded light

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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fixtures which direct light downward (i.e., lighting shall not emit higher than a horizontal level) and are fully shielded; Noise: the owner or his agent shall post and enforce quiet hours on the campground (9pm – 7am); Transportation: the owner or his agent shall obtain an encroachment permit from Caltrans, District 9 in order to access the proposed project using State right of way; Water Quality & Waste Management: the applicant shall work with the Inyo Environmental Health Department, Lahontan Regional Water Quality Control Board, and the California Housing Community Development Department to ensure that all permitting and regulations, both County and State, are met for the project’s proposed wells and septic systems; Biological Resources: botanical surveys shall be conducted for plants with blooming seasons outside the previous survey period (July 2019 & May 2020). These field surveys shall follow protocols set forth in the ‘Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities’ (CDFW 2018). As the Project has potential to support special-status species protected by federal and state laws [Fish & Game Code, §§ 711.7 (a) & 1802; PRC § 21070; CEQA Guidelines § 15386 (a), PRC § 21069; CEQA Guidelines, § 15381; Endangered Species Act Section 7(a)(2)], the applicant shall coordinate with CDFW & USFWS on the following surveys and provide the County with CDFW/USFWS' letter of compliance prior to construction:

- *Mohave Ground Squirrel (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83975&inline>)*
- *Desert Tortoise (https://www.fws.gov/nevada/desert_tortoise/documents/manuals/Mojave%20Desert%20Tortoise_Pre-project%20Survey%20Protocol_2017.pdf)*
- *Plant & Natural Communities (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>)*

The applicant shall conduct focused pre-construction surveys on all suitable nesting habitats within the Project area, no more than three (3) days prior to vegetation clearing or ground disturbance activities, and provide the County Planning Department with the survey report and findings before any ground disturbing activities.

Another Condition of Approval, necessitated by Tentative Parcel Map 422, is that the applicant shall improve or contribute appropriately towards the construction of all roads and utilities, within and serving the parcel per applicable standards, as may be required by the County in the future.

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)?

No, the proposed project does not have impacts that are individually limited, but cumulatively considerable. Due to the sparseness of the natural environment, and lack of disturbance to plant or animal habitat, this location is well suited for the proposed development.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

No, the proposed project has no known environmental effects which will cause substantial adverse effects on human beings either directly or indirectly. The proposed project would not adversely impact the resident to the west and may have positive impacts resulting from employment opportunities.