DRAFT INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

PURCHASE OF THREE PARCELS FROM THE CITY OF LOS ANGELES BY INYO COUNTY, WITHOUT WATER RIGHTS, FOR CONTINUED OPERATION OF BISHOP-SUNLAND, INDEPENDENCE, AND LONE PINE LANDFILLS

PREPARED FOR:

INYO COUNTY DEPARTMENT OF PUBLIC WORKS

DRAFT FOR PUBLIC REVIEW: MAY 2024

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PROJECT DESCRIPTION AND CEQA SUMMARY

Project title:	PURCHASE OF THREE PARCELS FROM THE CITY OF LOS ANGELES BY INYO COUNTY, WITHOUT WATER RIGHTS, FOR CONTINUED OPERATION OF BISHOP-SUNLAND, INDEPENDENCE, AND LONE PINE LANDFILLS
Lead agency name and address:	Inyo County 168 North Edwards Street Independence, CA 93526
Contact person and telephone number:	Ms. Rebecca Graves Operations Analyst, County Administration Project Management Office (760) 878-0423 Rebecca.Graves@InyoCounty.us
Project location:	Inyo County (County) is proposing the acquisition of three existing public solid waste facilities near the City of Bishop and the communities of Independence and Lone Pine – the Bishop-Sunland Landfill, Independence Landfill, and Lone Pine Landfill (collectively referred to as the Landfills). The County currently operates the Landfills pursuant to leases from the Los Angeles Department of Water and Power (LADWP). The County would purchase the three properties for the purpose of continued municipal waste management. The City of Los Angeles would retain the water rights associated with each of the three properties. In addition to the acquisition of the Independence Landfill and the Lone Pine Landfill, easements and construction of waterlines are proposed to connect the Independence and Lone Pine Landfills to the nearby town water systems. The proposed Project also involves water exchange with LADWP which will supply water to the Bishop-Sunland Landfill and the amount of water supplied will be replaced by the County from a well located at 701 S. Main Street in Bishop, CA. The Bishop-Sunland Landfill, operated by the County since at least 1955, is located on a 120-acre site 2 miles southwest of Bishop, and has an unlined disposal footprint covering 78 acres. The Independence Landfill, operated by the County since at least 1965, is located on a 90-acre site south of Independence. The Lone Pine Landfill, operated by the County since at least 1965, is located on approximately 60 acres southeast of the unincorporated community of Lone Pine. All three landfills are operated by the County subject to oversight and permits by the Inyo County Environmental Health Department (ICEHD), serving as the Local Enforcement Agency (LEA), the California Department of Resources Recycling and Recovery (CalRecycle), the Lahontan Regional Water Quality Control Board (LRWQCB), and the Great Basin Unified Air Pollution Control District (GBUAPCD). Facility addresses and permit identification numbers are listed below: BISHOP-SUNLAND CLASS III LANDFILL 110 Sunland Reservation Road Bishop, CA 93514 SWFP Facility Number 14-AA-0005 Waste Discharge Requirements: RWQCB Order No. 6-01-34, WDID No. 6B140300002 INDEPENDENCE CLASS III LANDFILL

	End of Dump Road Independence, CA 93526 SWFP Facility Number 14-AA-0004 Waste Discharge Requirements: RWQCB Order No. 6-95-116, WDID No. 6B140300004 LONE PINE CLASS III LANDFILL End of Substation Road Lone Pine, CA 93545 SWFP Facility Number 14-AA-0003 Waste Discharge Requirements: Board Order No. 6-95-70, WDID No. 6B140300006 See attached Location Map and Site Facility Plans for each of the three subject properties.
Project sponsor's name and address:	Fred Aubrey Inyo County Public Works Recycling and Waste Management 1360 N. Main Street Bishop, CA 93514 E-mail: faubrey@inyocounty.us
General plan description:	The General Plan Land Use Element designates the Project sites, including the Landfills and the proposed easements, as "Public Facilities." Landfill operation at the sites is consistent with this designation. Continued operation of these sites as landfills are also consistent with the County Solid Waste Management Plan and the Countywide Siting Element.
Zoning:	The zoning classifications of the Landfills are Public Use (P) and Open Space (OS-40), which conditionally permits existing operations at the Landfills.
Description of project:	The proposed Project would involve the acquisition of the three parcels on which the Landfills are located (without water rights) for continued operation of the Bishop-Sunland, Independence, and Lone Pine Landfills. The acquisition would include the existing site facilities, transfer of ownership from LADWP to Inyo County, continued long-term operation of the Landfills for municipal waste management purposes, minor and routine updates to the solid waste facilities permits, and compliance with applicable laws, regulations, and permits for solid waste facilities. The proposed Project would also include an exchange of water between Inyo County and LADWP for continued use of the existing water source at the Bishop-Sunland Landfill, the acquisition of an easement to allow for the connection of the Independence Landfill and a proposed alignment of a new waterline to connect the Lone Pine Landfill to the nearby town water system. The proposed Project also includes the construction of the waterlines in the easements to allow the County to discontinue the current practice of trucking water from the town water systems to the Landfills, but the water source for the Independence and Lone Pine Landfills would remain the same.
Surrounding land uses and setting:	The Independence and Lone Pine Landfills are surrounded by mostly undeveloped land, the Bishop-Sunland Landfill has adjacent agricultural, industrial uses and businesses including a salvage yard, mining of aggregate and decomposed granite, and road construction staging yards.
Other public agencies whose approval is required (e.g., permits, financial approval, or participation agreements):	With the proposed acquisition of the three properties by the County, continued operation of each of these essential public facilities would be continued by the County, in compliance with current and future applicable laws and regulations, currently under the authority of three primary permitting agencies: 1) ICEHD, serving as LEA; 2) CalRecycle; and 3) LRWQCB. A voluntary sale of the landfill properties to the County requires consent and approval by the Board of Water and Power Commissioners of the City of Los Angeles and the Los Angeles City Council.

MITIGATED NEGATIVE DECLARATION

Pursuant to: Division 13, Public Resources Code:

Inyo County (County) proposes to enter into a Purchase Agreement with the Los Angeles Department of Water and Power, for the parcels encompassing the existing municipal waste disposal facilities known as Bishop-Sunland, Independence, and Lone Pine Landfills (collectively referred to as the Landfills). The voluntary sale and purchase of the Landfills would not include water rights, and would restrict future use of the properties for the continuance of existing landfill operations. The purchase agreements would include a water exchange agreement for Bishop-Sunland Landfill and the acquisition of easements in Independence and Lone Pine for the construction of water supply lines from the town systems to the Landfills. The construction of the waterlines would allow the County to discontinue the current practice of trucking water from the town systems to the Landfills, but the water source for the Independence and Lone Pine Landfills would remain the same.

DETERMINATION

The County prepared this Initial Study (IS) / Mitigated Negative Declaration (MND) for the proposed Project, and following public and agency review, has determined that these activities would not have a significant effect on the environment based on the following findings:

- The proposed Project would have no impact on: Agriculture and Forest Resources, Energy, Population and Housing, Public Services, Recreation, and Transportation and Traffic.
- The proposed Project would have a less than significant impact on: Aesthetics, Air Quality, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Utility and Services Systems, Wildfire, and the Mandatory Findings of Significance.
- With the implementation of newly defined mitigation measures, the proposed Project would have an impact of "Less than Significant with New Mitigation Incorporated" on Biological Resources, Cultural Resources and Tribal Cultural Resources.

On the basis of this initial evaluation, as authorized representative of Inyo County, acting as CEQA Lead Agency for this proposed project:

☐ 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. Therefore, a MITIGATED NEGATIVE DECLARATION has been 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 ENVIROMENTAL IMPACT REPORT (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.

Nate Greenburg
County Administrator
County of Inyo

Date Signed

ACRONYMS AND ABBREVIATIONS

°F	degrees Fahrenheit
AB	Assembly Bill
AFY	acre-feet per year
Cal-OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CAAQS	California Ambient Air Quality Standards
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CCR	California Code of Regulations
CHRIS	California Historical Resources Inventory System
CNDDB	California Natural Diversity Database
DPW	Department of Public Works
EIC	Eastern Information Center
EIR	Environmental Impact Report
ERI	Environmental Resources International
GHG	greenhouse gas
GBUAPCD	Great Basin Unified Air Pollution Control District
HHW	Household Hazardous Waste
ICC	Inyo County Code
ICEHD	Inyo County Environmental Health Department
IS	Initial Study
JTD	Joint Technical Document
kV	Kilovolt
LADWP	Los Angeles Department of Water & Power
LEA	Local Enforcement Agency
LFG	Landfill Gas
MCL	Maximum Contaminant Level
MMBtu	Metric Million British Thermal Unit
MRP	Monitoring and Reporting Program
MSW	Municipal Solid Waste
LRWQCB	Lahontan Regional Water Quality Control Board

MND	Mitigated Negative Declaration
MM	Mitigation Measure
MRP	Monitoring and Reporting Programs
MSW	Municipal Solid Waste
MT/yr CO_2e	metric tons per year of carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NOP	Notice of Preparation
PCPCMP	Preliminary Closure and Post-Closure Maintenance Plans
PM_{10}	particulate matter less than 10 micrometers in diameter
PRC	Public Resources Code
SCE	Southern California Edison
SIP	State Implementation Plan
SMARA	Surface Mining and Reclamation Act
SWFP	Solid Waste Facilities Permit
SWPPP	Stormwater Pollution Prevention Plan
USEPA	U.S. Environmental Protection Agency
USGS	U.S. Geological Survey
USFWS	U.S. Fish and Wildlife Service
VOC	volatile organic compound
WDID	Waste Discharge Identification Number
WDR	Waste Discharge Requirements

1.0 PROJECT OVERVIEW

1.1 INTRODUCTION

Inyo County (County) has prepared this Initial Study (IS) in accordance with the California Environmental Quality Act (CEQA), for evaluation of potential environmental impacts related to Inyo County's proposed purchase of three properties from the City of Los Angeles Department of Water and Power (LADWP) without water rights for continued long-term operation of the Bishop-Sunland, Independence, and Lone Pine Landfills (collectively referred to as the Landfills) for continued municipal waste management purposes.

These three existing Class III Landfills have been operated by the County Department of Public Works (DPW) for decades under leases from the LADWP and are the only active landfill facilities currently serving the City of Bishop, the communities of Big Pine, Independence, and Lone Pine, and unincorporated areas of the Owens Valley. In order to ensure an effective, long-term waste management program in compliance with applicable permits, laws, and regulations, the County proposes to purchase the three properties on which the Landfills are located from LADWP. The purchase will not include the water rights associated with the properties.

1.2 USE OF THE INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

Inyo County prepared this Initial Study/Mitigated Negative Declaration (IS/MND) for use by the Inyo County Board of Supervisors during its consideration of entering into a Purchase Agreement with the Los Angeles Department of Water and Power (LADWP) for three parcels currently being leased for municipal solid waste purposes, near the communities of Bishop, Independence, and Lone Pine. In addition to review by the County, as Lead Agency, this IS/MND is intended to meet the review requirements of LADWP to sell the parcels, as well as for the use by agencies responsible for environmental compliance monitoring of the Landfills.

2.0 PROJECT BACKGROUND

The Bishop-Sunland Landfill, operated by the County since at least 1955, is located on a 120-acre site approximately 2 miles southwest of the City of Bishop, and has an unlined disposal footprint covering 78 acres. The Independence Landfill, operated by the County since at least 1965, is located on a 90-acre site south of Independence, with an unlined disposal footprint of approximately 15 acres. The Lone Pine Landfill, operated by the County since at least 1965, is located on approximately 60 acres southeast of the unincorporated community of Lone Pine, with an unlined disposal footprint of approximately 26 acres. All three landfills are operated by the County subject to oversight and permits by the Inyo County Environmental Health Department (ICEHD), serving as the Local Enforcement Agency (LEA), the California Department of Resources Recycling and Recovery (CalRecycle), the Lahontan Regional Water Quality Control Board (LRWQCB), and the Great Basin Unified Air Pollution Control District (GBUAPCD). The three subject landfills are located on property owned by the Los Angeles Department of Water and Power (LADWP), under lease to Inyo County.

To ensure an effective, long-term waste management program in compliance with applicable permits, laws and regulations, the County proposes to purchase the three properties on which the Landfills are located from LADWP. The proposed purchase would not include the water rights associated with the properties. The environmental review presented herein focuses on the transfer of ownership of the three properties, re-permitting of the Landfills for continued operation without expansion of use, an exchange of water between the County and LADWP for the Bishop-Sunland Landfill coming from and used in the same general area, the purchase of easements to allow for connection to town water systems at the Independence Landfill and the Lone Pine Landfill, the construction of a waterline within the easements to connect the Independence town water system to Independence Landfill to provide water for landfill operation uses, and the construction of a waterline within the easement to connect the Lone Pine town water system to Lone Pine Landfill to provide water for landfill operation uses. The County currently trucks water from the town water systems to the Independence and Lone Pine Landfills. Construction of the waterlines would allow the County to continue to use the same water source, but to discontinue trucking.

2.1 NEED FOR PROJECT

The Integrated Waste Management Act of 1989 requires counties to adopt county-wide waste management plans that, among other things, provide for at least 15 years of capacity for the disposal or transformation of solid waste generated within the County that cannot be reduced, recycled or composted. The County currently operates the three landfills on three properties owned by LADWP near the City of Bishop and the communities of Lone Pine and Independence.

The County evaluated viable alternatives to continuing to lease the properties from LADWP, to ensure that the County can maintain financially sustainable and environmentally sound means of waste disposal for the County and its residents. The primary alternatives included the purchase of the three properties, condemnation of the properties to allow for the acquisition of the parcels with water rights, or closure of one or more of the facilities. Closure of the facilities was deemed

to be infeasible and resulting in a greater environmental impact, due to the lack of available land suitable for siting of a new landfill, prohibitively expensive costs of hauling all waste out of the area, and environmental impacts of building a new facility. Following the evaluation of alternatives and coordination with LADWP, the County is proposing a voluntary purchase of the properties on which the Landfills are located, without water rights, for the long-term operation of the existing Landfills. The County is also proposing the acquisition of easements to allow for connection to town water systems at the Independence Landfill and using the existing road right of way to connect the Lone Pine Water System to the Lone Pine Landfill.

2.2 CEQA BACKGROUND

In 1999, three Mitigated Negative Declarations (MNDs) were prepared (Environmental Resources International [ERI] 1999) and adopted by Inyo County for the operation of the Landfills. These MNDs evaluated the environmental issue areas identified in the CEQA IS Checklist (Appendix G of the CEQA Guidelines) in effect at the time, thus are formally incorporated into this IS/MND by reference. Mitigation measures were identified for the following topics: Geology and Soils, Noise, Hazards and Hazardous Materials, and Hydrology and Water Quality. These mitigation measures have been summarized in Table 1 and are currently being implemented by the County as a part of routine operation of the Landfills.

CEQA Guidelines Section 15378 provides the following definition of a project:

> (a) "Project" means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:
>
> > (1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvement to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.
> >
> > (2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants subsidies, or other forms of assistance from one or more public agencies.
> >
> > (3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

The term "project" refers to the whole of an action and to the underlying physical activity being approved, not to each government approval (CEQA Guidelines Section 15378[c]). Thus, even if the Lead Agency needs to grant more than one approval for a project, only one CEQA document should be prepared. Similarly, if more than one government agency must grant an approval, only one CEQA document should be prepared. This approach ensures that responsible agencies granting later approvals can rely on the lead agency's CEQA document.

The CEQA Guidelines define a project under CEQA as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. This broad definition is

intended to provide the maximum protection of the environment. In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by Responsible Agencies.

CEQA case law has established the following general principles on project segmentation for different project types:

- For a phased development project, even if details about future phases are not known, future phases must be included in the project description if they are a reasonably foreseeable consequence of the initial phase and will significantly change the initial project or its impacts. *Laurel Heights Improvement Association v Regents of University of California* (1988) 47 Cal. 3d 376.
- For modification of a permit for an existing facility, the scope of the project description can be limited to the scope of the permit modification and does not cover the entire facility. *Citizens for East Shore Parks v. State Lands Commission* (2011) 202 Cal.App.4th 549.

The proposed Project, which would be subject to new discretionary approvals by the County as Lead Agency, include the acquisition of the properties on which the Landfills are located through a voluntary purchase and sale agreement with LADWP, minor and routine updates to regulatory documents and permits, a water exchange for continued use of the existing water source at the Bishop–Sunland Landfill, the acquisition of easements, and the extension of town water systems to the Independence and Lone Pine Landfills to replace the trucking of water to supply the facilities. CEQA requires that the whole of the action, and any foreseeable direct or indirect impacts to the environment, to be considered and evaluated for significance with appropriate mitigation measures to be applied where applicable and feasible to reduce the impacts.

No expansion of the Landfills or major operational changes in landfill operations that would result in new physical changes to the environment are included as a part of the proposed Project. The proposed change of property ownership would allow the County to continue to operate these essential public facilities with minor revisions to its Solid Waste Facilities Permits (SWFPs) in accordance with applicable laws and regulations. However, it is recognized that the water exchange related to the Bishop–Sunland Landfill, the construction of waterlines within easements acquired from the City of Los Angeles, and the continued operation of the Landfills as solid waste disposal sites without appropriate mitigation measures, could have adverse impacts on the environment over time. The County is committed to responsible stewardship of the Landfills, and eventual closure and reclamation activities in accordance with applicable laws governing landfills in California.

As part of the current IS and Environmental Checklist presented herein, the previously established mitigation measures for the ongoing landfill operations are described (see Table 1) and evaluated to determine whether they adequately reduce potential impacts to a less–than–significant level. Where necessary, new mitigation measures have been developed to ensure that there are no new significant impacts as a result of the proposed Project.

Potential impacts related to acquisition of easements and the construction of waterlines within the easements for connection of the landfills in Independence and Lone Pine to the town water systems are also evaluated as a part of the proposed Project. It is anticipated that the waterlines would be constructed in existing roads or road shoulders, thus minimizing potential impacts. Detailed plans for the waterline connections and extensions to the landfills in Independence and Lone Pine have not yet been developed or evaluated, as they would be constructed in the future as part of a separate public works project. Analysis of the environmental impacts of obtaining the easements, and the impact of trenching for the new waterlines, has been included to the extent foreseeable based on the information available at the time of this report.

2.3 NOTICE OF PREPARATION AND PUBLIC SCOPING INPUT

The County initiated the environmental impact analysis for this project, with the publication of a Notice of Preparation (NOP) and Notice of Public Scoping Meeting for a Draft Environmental Impact Report (EIR), on February 1, 2022. In addition to distribution to the State Clearinghouse and publication to a public Inyo County website, the NOP was sent directly to eight tribal governments inviting formal Tribal Consultation and was sent directly to all responsible and associated agencies identified.

A Public Scoping Meeting, outlining the proposed Project and facility details, was held by the County on February 24, 2022, and an extended public comment period was opened until March 18, 2022. Although some agencies and members of the public attended the public scoping meeting, written scoping comments were only received from CalRecycle, the Native American Heritage Commission (NAHC), and the Big Pine Tribe Environmental Office.

After considering input received during the public scoping period, the Project Description was expanded upon to better ensure the associated CEQA documentation would consider the whole of the action and all related activities with the potential to impact the environment. These efforts included preliminary definition of the parcels to be acquired, evaluation of the mechanism and details of the land transfer, review of regulatory permit requirements and on-going compliance efforts, review of the adequacy of existing mitigation measures, review of whether the proposed Project would have adequate water supply as proposed, and review of CEQA IS Checklist categories and case law that were added since the previous environmental review for these facilities.

Due to the complexity of the individual elements of the proposed Project, many of which were previously analyzed as part of the ongoing facility permitting, and to ensure incorporation of environmental impact analysis scoping comments by the public, local Tribes and the Responsible Agencies involved, a detailed Project Description and CEQA IS Checklist was prepared after the Public Scoping Meeting and public comment period. The Final IS (State Clearinghouse [SCH] No. 2022020028) was published in July 2022, and was also distributed directly to responsible agencies and interested parties on August 26, 2022.

Following the publication of the July 2022 IS, revisions to the previous Project Description and IS were initiated. The originally proposed project involved acquisition of the Landfills, with water rights, to allow for groundwater supply wells to be installed for necessary landfill operations and

compliance. Now, the County and LADWP propose to execute a voluntary purchase and sale of the properties and the easements to the County, without water rights, with property use restricted in the deeds to municipal waste management. It is anticipated that LADWP would concurrently approve purchase and sale agreements for each of the landfill properties and certain rights for Inyo County to extend the town water systems to the Independence and Lone Pine Landfills. Revisions to the Project Description and IS are discussed in further detail herein.

3.0 DETAILED PROJECT DESCRIPTION

The County has operated three existing landfills near the City of Bishop and the communities of Independence and Lone Pine for over 50 years, to provide legally mandated and essential waste disposal services to the public. The County and LADWP have proposed a voluntary purchase and sale of the three landfills, without water rights, and the easements for the extension of the town water systems to the Independence and Lone Pine Landfills to the County, and to exchange water with the County for the operation of the Bishop-Sunland Landfill. The County would continue to use and operate the Landfills for municipal solid waste disposal purposes in accordance with permit requirements, and in compliance with current and future laws and regulations regarding municipal waste facilities in California. The County does not intend to change the general use of the properties at issue from their existing uses. However, general operations may be modified as required to comply with regulatory requirements set forth by Public Resources Code, Division 30; California Code of Regulations (CCR) Title 14; CCR Title 27; SWFPs issued by CalRecycle; Waste Discharge Requirements (WDRs) issued by the RWQCB; and other applicable local, state, and federal regulations. At the Bishop-Sunland Landfill, the County would continue to utilize the LADWP well on the adjacent LADWP property for operational purposes, but would enter into a water exchange agreement to trade an equivalent amount of water from its road yard located at 701 South Main Street in Bishop. All groundwater pumped by the County to replace water supplied to the Bishop-Sunland Landfill will be used by LADWP on City of Los Angeles-owned lands on the Bishop Cone, as required by the Hillside Decree and the Inyo County/Los Angeles Long Term Water Agreement.

Also, the County would construct waterlines within the easements to connect the Independence and Lone Pine facilities with the town water systems. The Independence waterline includes the purchase of a new easement across LADWP property. Upon completion of the connections, the County would cease its current practice of trucking water from the town water systems to the two facilities.

The continued operation of unlined Class III Landfills, by nature of the land use and types of wastes accepted, have the potential to cause significant environmental impacts. However, landfill operation in California is highly regulated, and use is predictable due to a required long-term planning horizon. Even after a landfill site is formally closed according to its Preliminary Closure and Post-Closure Maintenance Plans (PCPCMP), a 30-year post-closure monitoring and maintenance period is required. The SWFPs, PCPCMPs, and WDRs all provide substantial protections, in the form of permit conditions, to help address potential environmental impacts. In addition, with the proposed transfer of property ownership, the County would be able to streamline and complete many compliance efforts in progress.

With the proposed acquisition of the three properties by the County, operation of each of these essential public facilities will continue to be in general compliance with all applicable laws and regulations, currently under the authority of three primary permitting agencies:

1. Inyo County Environmental Health Department (ICEHD), serving as the Lead Enforcement Agency (LEA);

2. California Department of Resources, Recycling and Recovery (CalRecycle); and

3. Lahontan Regional Water Quality Control Board (LRWQCB).

Compliance with these permitting agencies, and an update of permit documents to reflect the County as the landowner and operator of the facilities, is anticipated to include the following:

- Description of the parcels proposed for acquisition, to include the existing leased facility areas and the existing facility components, including the landfill gas (LFG) and groundwater monitoring well networks for each facility required by CCR Title 27, and current WDRs.
- Update of the recently approved PCPCMPs for each landfill, for approval by the LEA and CalRecycle.
- Update of the Joint Technical Document (JTD) / Report of Disposal Site Information for each landfill.
- Preparation of a Solid Waste Facilities Permit Revision (or modification) Application for each of the three landfills, for submittal to the LEA, CalRecycle, and the LRWQCB.
- Revision of WDRs with the LRWQCB to reflect property transfer and current Evaluation Monitoring Program (Lone Pine Landfill) and Corrective Action Program (Bishop-Sunland Landfill).
- Continuation of LFG monitoring and reporting according to Title 27 requirements, groundwater monitoring and reporting according to current Monitoring and Reporting Programs (MRPs), and continued implementation of Evaluation Monitoring and Corrective Action Monitoring programs.
- Continued monitoring and operation of the septage ponds, contaminated soil landfarm, asbestos disposal area, waste oil disposal and recycling facilities, and waste diversion programs according to permit and WDR requirements.

Most of the above referenced technical documents are recently updated, and only minor changes to reflect ownership change, or additions to comply with regulatory requirements, are anticipated. The current permitting documents for each site describe the operations and permit requirements in detail (Geo-Logic Associates 2022, 2023).

3.1 DEFINITION OF PARCELS

In order to acquire these properties, the County has developed tentative parcel maps subject to review and formal parcel definition in a Record of Survey. Proposed acquisition boundaries are shown on Proposed Parcel Maps presented on Figures 2, 3, and 5 for the Bishop-Sunland, Independence and Lone Pine Landfills, respectively. All three landfills are currently designated as OS-40 and/or Public. OS-40 designations conditionally permit landfill operations. The County intends to acquire only the portions of the Landfill Properties necessary for operations. The following activities are anticipated based on review of existing parcels, zoning, and land use designations, but are subject to change based on approval processes for sale of real estate by LADWP and the terms of the purchase agreement which is currently under development.

At Bishop-Sunland Landfill, the historically leased parcel includes the landfill, subleases to Bishop Waste Disposal Eastern Sierra Propane and a vacant lot to the east of the landfill. Proposed boundaries for the parcel to be purchased from LADWP are shown on a Proposed Parcel Map presented on Figure 2. The proposed landfill parcel boundary would generally follow the former landfill lease footprint, but it is proposed that the Bishop Waste Disposal and Eastern Sierra Propane areas would be excluded, for a parcel size of 118.53 acres. Access agreements or easements would be defined for the off-site monitoring wells, which are currently accessed and maintained through license agreements with LADWP. These off-site wells include two down-gradient wells immediately adjacent to the landfill on the East, as well as two up-gradient/ background monitoring wells located in or in close proximity to the Browns Salvage lease on the southwest side of the Bishop Landfill. The details of the purchase agreement would not include water rights or allow the development of on-site groundwater sources, and would restrict the use of the property to municipal waste management activities. The existing water supply well, across Sunland Indian Reservation Drive to the north, would continue to be utilized by the County to supply water for dust control and operational purposes at the Bishop-Sunland Landfill, but would be outside the parcel boundaries and would continue to be owned by LADWP. It is anticipated that as part of the sale of the Bishop-Sunland Landfill the County would exchange water with LADWP in an equivalent quantity consumed at the landfill site from a separate nearby location owned by the County. The details of this agreement are pending, but the quantity of water would be less than 7 acre-feet per year (AFY), and the traded quantity would be used by LADWP in the same general "Bishop Cone" area.

The proposed parcel boundaries for the Independence Landfill are shown on a Tentative Parcel Map presented on Figure 3. The proposed landfill parcel boundary would generally follow the former landfill lease footprint but is proposed to exclude the Inyo County Road Department pit and mixing table area to the West, for a modified parcel size of 50.89 acres (pending final Record of Survey). It is also anticipated that the purchase agreement would include an easement within which a waterline would be constructed to connect the Independence Landfill with the Independence Town Water System, which would allow for sale of the landfill parcel without water rights, yet still ensure the County has the ability to provide adequate water supply from the existing water source for dust control, sanitation, and other necessary landfill operational uses. The proposed future route of the water system connection is shown in Figure 4.

The proposed parcel boundaries for the Lone Pine Landfill are shown on a Tentative Parcel Map presented on Figure 5. The proposed landfill parcel boundary would follow the existing landfill lease boundary (60.57 acres) and will require that an access agreement or easement be defined for the off-site monitoring well to the east of the site, as shown in Figure 5. It is also anticipated that the purchase agreement would include an easement or right-of-way alignment within which a waterline would be constructed to connect the Lone Pine Landfill with the Lone Pine Town Water System, which would allow for sale of the landfill parcel without water rights, yet still ensure Inyo County has the ability to provide adequate water supply from the existing water source for dust control, sanitation, and other necessary landfill operational uses. The proposed future route of the water system connection is shown in Figure 6.

3.2 AGREEMENT FOR CONTINUED USE OF LADWP SUPPLY WELL FOR BISHOP-SUNLAND LANDFILL OPERATIONS

Bishop-Sunland Landfill is currently supplied by an LADWP Agriculture well, located immediately across Sunland Indian Reservation Road (see Figure 2). The well is currently plumbed under Sunland Indian Reservation Road, where it reaches the landfill and supplies water trucks for dust-control, as well as other operational uses. The Bishop-Sunland Landfill is estimated to require approximately 7 AFY of groundwater for operational purposes.

As part of the proposed sale agreement, the County and LADWP have agreed that continued use of the supply well would be contingent on the County replacing an equivalent amount of groundwater back into the LADWP ditch and aqueduct system. The water used at the Bishop-Sunland Landfill would be replaced using a nearby well located in one of the County's yards, approximately 1.5 miles north of the landfill. The water from this well would be delivered via the North Indian Ditch and the Bishop Creek Canal to Owens River. Potential impacts from this proposed water exchange agreement were evaluated by LADWP using their groundwater model for the Owens Valley and found to be insignificant. The results of that evaluation are provided in Appendix A – Evaluation of Pumping Inyo County Yard Well to Replace the Water Used at Bishop Landfill (LADWP 2023). All groundwater pumped by the County to replace water supplied to the Bishop-Sunland Landfill will be used by LADWP on City of Los Angeles-owned lands on the Bishop Cone, as required by the Hillside Decree and the Inyo County/Los Angeles Long Term Water Agreement.

3.3 DEFINITION OF EASEMENTS FOR WATERLINES

As these properties would be sold voluntarily to Inyo County from LADWP, without water rights, the proposed Project also includes the establishment of a water line alignment in Lone Pine and purchase of easements along existing roads in Independence and Lone Pine, for extension of the town water systems to the respective landfills.

Tentative waterline easement maps are provided in Figures 4 and 6. The precise location and limits of the easements would be determined by Record of Survey and in the Purchase Agreement with LADWP, but are proposed to be approximately 6 feet wide, along existing road shoulders.

The waterline easement for Independence Landfill, depicted on Figure 4, would extend from the existing waterline at Parcel 002-160-05, across Parcel 002-160-08, along the shoulder of Mazourka Canyon Road, down the centerline of existing (dirt) Independence Dump Road, for a total length of approximately 7,551 feet (1.43 miles). The easement details would be subject to change based on future engineering design, but disturbance is proposed to be limited to existing road shoulders and dirt roads, to avoid impacts related to construction or trenching in undisturbed ground. If undisturbed ground is determined to be impacted, care would be taken to avoid sensitive biological or cultural/tribal resources. As described further in Section IV, *Biological Resources* and Section V, *Cultural Resources* this would involve pre-construction surveys and avoidance.

The waterline easement for Lone Pine Landfill, depicted on Figure 6, would extend from the existing waterline at the intersection of E. Inyo Street and Line Street, along the shoulder of Sub Station Road, for a total length of approximately 7,494 feet (1.42 miles). The alignment details would be subject to change based on future engineering design, but disturbance is proposed to be limited to existing road shoulders to avoid impacts related to construction or trenching in undisturbed ground. If undisturbed ground is determined to be impacted, care would be taken to avoid sensitive biological or cultural/tribal resources. As described further in Section IV, *Biological Resources* and Section V, *Cultural Resources* this would involve pre-construction surveys and avoidance.

No waterline easement is necessary for the Bishop-Sunland Landfill, as the Purchase Agreement would include continued use of the existing Landfill Supply Well, located across Sunland Indian Reservation Road in parcel 013-020-12 (see Figure 2). In exchange for continued use of the existing supply well, Inyo County would trade LADWP an equivalent amount of water each year, pumped from a County-owned property in Bishop.

3.4 UPDATE OF SOLID WASTE FACILITY PERMITS

The SWFPs for the three sites are reviewed for updates and adequacy every 5 years. This 5-year review is conducted by the ICEHD, acting as LEA, and is subject to review and concurrence by CalRecycle. The SWFP for Bishop-Sunland Landfill was renewed in 2017, and the 5-year review was initiated in 2022. No permit revisions are currently anticipated for the Bishop-Sunland Landfill, unless directed by the LEA, CalRecycle, or the LRWQCB as part of that 5-year review and determination.

No lateral expansion of the landfill site capacities is proposed, as Title 27 requires the waste disposal in unlined waste management units to be contained to the established waste footprint. The total site capacities are subject to correction with updated site topographic surveys, or redesign of grading and closure plans, but major changes or expansion of site capacities are not anticipated.

As previously described, an expansion of the landfill facilities is not part of the proposed Project; however, the remaining disposal capacity and associated site life and estimated closure year are recalculated frequently. Current Existing Facility Conditions, including permit components and waste in place, are summarized in Table 2. The estimated closure years for these three facilities, assuming current and projected waste disposal rates and soil cover ratios, are 2066 for Bishop-Sunland Landfill, 2044 for Independence Landfill, and 2053 for Lone Pine Landfill, equating to site life estimates of 21 to 43 years (Geo-Logic Associates 2023c). These updated site life estimates are based on projected organic waste reduction as required by Senate Bill (SB) 1383, and as recently described in the Status Impact Reports prepared by Geo-Logic Associates in compliance with the new regulation. These estimates and the approved PCPCMPs would be updated, as necessary. The approved Closure Plans would then be implemented, requiring installation of approved final cover material and post-closure maintenance and monitoring for a 30-year post-closure period. The County is required to provide financial assurances that cover closure activities as well as foreseeable corrective action activities. This mandatory long-term planning horizon, and

obligation by the County to operate, close, and monitor these landfill sites for over six decades, reinforces the County's motivation to own the landfill parcels.

The periodic review and revision of SWFPs also includes update of the PCPCMP and JTD/Report of Disposal Site Information for each of these sites, subject to review and approval by CalRecycle and the LRWCQB. Proposed SWFP modifications are reviewed for significant impacts under CEQA during each of the 5-year permit review and revision cycles. Although the current project does not propose an expansion to the landfill sites or operations, it does include a renewal of the SWFPs for Independence and Lone Pine Landfills.

The changes to these two SWFPs are summarized below.

Independence Landfill – The modifications proposed in the SWFP Review Application in 2023 include the following:

- Reflect current operating days and hours: 2 days per week, Thursdays and Sundays, 7:30am to 3:30pm, exclusive of holidays;
- Update the total permitted capacity to reflect accurate survey data and match the approved PCPCMP;
- Change the maximum waste disposal rate from a daily maximum tonnage to a weekly maximum tonnage to allow more flexibility for disposal over the two operating days per week, and allow for occasional spikes in disposal rates (e.g., due to construction or demolition projects);
- Update site life calculations, fill sequencing and closure date to reflect current waste-in-place, soil ratios and disposal rates, as well as updating the topographical base maps; and
- Add types of waste accepted and other minor changes to reflect current operations and new regulatory activities.

Lone Pine Landfill – The modifications proposed in the SWFP Review Application in 2023 include the following:

- Reflect current operating days and hours: 5 days per week, Thursday through Monday, 7:30am to 3:30pm, exclusive of holidays;
- Update the total permitted capacity to reflect accurate survey data and match the approved PCPCMP;
- Change the maximum waste disposal rate from a daily maximum tonnage to a weekly maximum tonnage to allow more flexibility for disposal over the five operating days per week, and allow for occasional spikes in disposal rates (e.g., due to construction or demolition projects);
- Update site life calculations, fill sequencing and closure date to reflect current waste-in-place and disposal rates, as well as updating the topographical base maps; and
- Add types of waste accepted and other minor changes to reflect current operations and new regulatory activities.

If the current 5-year permit review processes identify necessary revisions to the SWFPs or JTDs, these changes would be reviewed for compliance under CEQA.

3.5 OTHER REGULATORY COMPLIANCE ACTIVITIES

Other regulatory compliance activities that are anticipated to be continued, or revised if required by the responsible regulatory agency, are the following:

- Operation and maintenance of LFG extraction systems at Bishop-Sunland Landfill, according to the approved Corrective Action Plan (CAP). Emissions monitoring (and filter changeout as necessary) of the carbon filters according to Permits to Operate issued by the GBUAPCD.
- Monitoring of LFG perimeter probes at each of the Landfills, in accordance with Title 27. Exceedance of 5 percent by volume of methane at any perimeter probe requires notification to the LEA and CalRecycle, with potential corrective action, as necessary.
- Quarterly or semi-annual groundwater monitoring and reporting, according to current WDRs and MRPs issued by the LRWQCB for each of the Landfills. These WDRs dictate evaluation monitoring and corrective action procedures if impacts to groundwater are observed, and the County plans to continually comply with, and update these WDRs as necessary to reduce impacts from landfilled waste to groundwater beneath the facilities.
- Implementation of recycling, diversion, and household hazardous waste disposal programs to prevent these materials from being landfilled.
- Control of windblown trash through daily cover operations, wind fences, and other measures as dictated by the LEA and/or CalRecycle.
- Dust control through application of water to roads and active working faces, as necessary or as dictated by the GBUAPCD. It is anticipated that the current practice of trucking water onto the site for Independence and Lone Pine Landfill operations would continue until the town water systems are extended to provide water from the town water systems to supply these two landfills.
- Revisions to the Sampling and Analysis Plans for Contaminated Soil Landfarm and Septage Ponds at the Bishop-Sunland Landfill, to maintain compliance with the WDRs and MRP for the site, as is currently being required by the LRWQCB. The County is also evaluating potential improvements to the Bishop-Sunland septage ponds to maintain compliance and mitigate potential impacts to the environment.

4.0 ENVIRONMENTAL SETTING

4.1 CLIMATE

The Owens Valley is characterized by hot, dry summers with temperatures as high as 107 degrees Fahrenheit (°F) and moderately cold winter lows of 2 °F. The Sierra Nevada Mountains cast a rain shadow resulting in low precipitation over the area. Above 10,000 feet, the majority of precipitation falls as snow and averages 30 inches (in snow-water equivalent). In the Owens Valley, average precipitation is 4 to 6 inches; in the White Mountains and Inyo Mountains precipitation ranges from 7 to 10 inches. Most precipitation falls between December and February.

4.2 AIR QUALITY

Air quality in a given location is determined by the concentration of various pollutants in the atmosphere. Specific geographic areas are classified as either *attainment*, *maintenance*, or *nonattainment* for each criteria pollutant based on a comparison of measured air quality data with relevant federal and state air quality standards. *Attainment* areas include areas that meet the relevant primary or secondary ambient air quality standards for each criteria pollutant, while *nonattainment* areas include areas that do not meet the standards or that otherwise contribute to or affect ambient air quality in nearby areas that are not in *attainment*. A *nonattainment* area can reach *attainment* when a State Implementation Plan (SIP) has been adopted and National Ambient Air Quality Standards (NAAQS) have been met. During this time, the area is designated as *maintenance* area from the effective date of the SIP for a probationary period of two consecutive ten-year terms. The County, which is located in the GBUAPCD, is designated as a *nonattainment* area in the Owens Dry Lake area, which includes both the Lone Pine and Independence Landfills, for particulate matter less than 10 micrometers in diameter (PM_{10}) (U.S. Environmental Protection Agency [USEPA] 2018). All other criteria pollutants are currently within *attainment* (USEPA 2018). The air basin at the Bishop-Sunland Landfill is in compliance with all state ambient air quality standards.

Periodic application of water to site surfaces is the only method of dust control currently employed at the three sites. A water truck stationed at the landfills are utilized on an as needed basis to sprinkle site surfaces and roads to suppress dust generation. At Bishop-Sunland, water is obtained from an on-site well, at Independence and Lone Pine water is obtained from local town water system production wells and trucked onto the landfills. The local town water system supply wells would continue to be used at Independence and Lone Pine as part of this proposed Project, however, the waterlines will be extended from the town supply systems to both the Independence and Lone Pine Landfills.

LFGs are also vented to the atmosphere, after filtration and removal of volatile organic compounds (VOCs), at Bishop-Sunland under GBUAPCD Permits to Operate No. 1691-00-15, No. 1692-00-15, and No. 1560-02-23 (GBUAPCD 2015, 2023). The three permits require monthly monitoring of influent and effluent concentrations of VOCs at the active LFG extraction systems to maintain compliance with permit conditions.

4.3 TOPOGRAPHY, GEOLOGY, AND SOILS

Bishop–Sunland –The project site is situated on an alluvial fan elevated approximately 130 feet above the floor of the Owens Valley and the fan slopes gently with an east to northeast aspect. Surface soils consist of sands with gravel and silt, with increasing clay content and cemented hardpan at depth. Layers of clay and silt in excess of 10 feet thick are noted in the stratigraphic profiles of the site. Tuff bedrock is located at depths ranging between 150 and 200 feet below ground surface. Known significant mineral resources have not been identified at the site.

A geologic fault considered to have been active during Holocene time has been identified north of the site. Based on surface topography, the same fault (a branch of the Owens Valley Fault Zone) is projected to traverse through the landfill site, though its exact location has not been identified (Geo–Logic Associates 2019, 2021). Earthquake Fault Zone Maps are provided in Appendix D.

Independence – Sedimentary soils primarily composed of sands, gravels and silts underlie the Independence Landfill. The site is located at the toe of a broad, gently sloping alluvial fan elevated approximately 160 feet above the Owens Valley Floor. Site soils have been classified as well graded sand with gravel and silt. Permeability ranges between moderate to high. The modified proposed boundary at the Independence Landfill excludes areas adjacent to, and to the west of the landfill that are used for mineral extraction (Road Department borrow pit). Although these areas are currently part of the LADWP lease to the County, they are not proposed to be part of the voluntary sale by LADWP to the County for landfill operational purposes. A portion of the current lease is subject to reclamation requirements under the Surface Mining and Reclamation Act (SMARA), so the sale of the Independence Landfill would also include a modification of the SMARA boundary by the Inyo County Planning Department (based on a meeting with Inyo County Planning Department on May 19, 2023).

Lone Pine – The site is located on an east-sloping shallow alluvial fan at the western edge of the Owens River floodplain, elevated approximately 65 feet above the river. Underlying soils consist of a well-graded sand with gravel, silt, and clay. Layers of sandy clay have been identified in stratigraphic profiles of the site. Laboratory testing of site surface samples have classified site soils as sandy silty clay. Known significant mineral resources have not been identified at site.

4.4 HYDROLOGY

The primary watercourse in the County is the Owens River, which begins at Big Springs and flows through Long Valley until it empties into Crowley Reservoir in Mono County. From Crowley Reservoir, the Owens River flows into the Owens River Gorge (where it enters Inyo County), which runs approximately 20 miles to Pleasant Valley Reservoir. The Middle Owens River reaches from Pleasant Valley south past Bishop and Big Pine to the Los Angeles Aqueduct Intake downstream of Tinemaha Reservoir. The Lower Owens River continues downstream of the Intake south to the Owens River Delta.

No surface water bodies exist at the Bishop–Sunland, Independence, or Lone Pine Landfills, nor do any natural streams, creeks or rivers cross site boundaries. The Owens River is located approximately 4 miles east of the Bishop–Sunland Landfill, approximately 2.5 miles east of the Independence Landfill, and approximately 0.25 miles east of the Lone Pine Landfill. Average

annual precipitation ranges approximately 4.5 to 6.5 inches and evaporation averages of approximately 60–80 inches per year at the three landfill locations.

During preparation of site design documents, a hydrologic analysis was performed and the drainage facilities were designed to handle the 100-year, 24-hour storm event. Networks of open channels, culverts, berms, and retention basins have been constructed to intercept storm water flows and safely route them around the site.

4.5 VEGETATION COMMUNITIES

The Bishop-Sunland, Independence, and Lone Pine Landfills are active landfills which are largely disturbed and essentially barren of vegetative growth. Areas surrounding the Bishop-Sunland Landfill consist of Sagebrush and Rabbitbrush scrub. Vegetation at areas surrounding the Independence Landfill include Alkaline Desert Scrub including shadscale and cattle saltbrush (*Atriplex polycarpa*). Areas surrounding the Lone Pine Landfill consist of primarily Alkali Desert Scrub including Greasewood and Shadscale, to the east of the Lone Pine Landfill is the Owens River and Alkaline mixed grasses and forbs.

4.6 WILDLIFE

Mammal species with the potential to occur at the Bishop-Sunland, Independence, and Lone Pine Landfills include mule deer (*Odocoileus hemionus*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), desert woodrat (*Neotoma lepida*), and numerous bat species. Other small mammals such as coyotes (*Canis latrans*), gray fox (*Urocyon cineroargenteus*), kit fox (*Vulpes macrotis*), raccoons, and bobcats (*Lynx rufus*).

Common bird species observed at the Bishop-Sunland, Independence and Lone Pine Landfills include gulls (*Larus* spp.), european starlings (*Sturnus vulgaris*), and common raven (*Corvus corax*). %

4.7 SPECIAL-STATUS SPECIES

Special-status species are defined as those plants, fish, and wildlife that, due to their recognized rarity or vulnerability to various causes of habitat loss or population decline, are recognized by federal (i.e., U.S. Fish and Wildlife Service [USFWS]), state, or other agencies as under threat from human-associated activities. Some special-status species receive specific protection that is defined by legislation (i.e., federal Endangered Species Act, California Endangered Species Act, Migratory Bird Treaty Act, etc.). Others are protected by adopted policies and expertise of state resource agencies or organizations with acknowledged expertise, or policies adopted by local governmental agencies such as counties, cities, and special districts to meet local conservation objectives.

Based a query of the California Natural Diversity Database (CNDDB), several federally listed and state-listed fish and wildlife species occur in proximity to Bishop-Sunland, Independence, and Lone Pine Landfills and have the potential to occur at these areas. The tables provided in Appendix C describe the listed species with the potential to occur, their federal and state status, and general habitat descriptions.

4.8 CULTURAL AND TRIBAL RESOURCES

The environmental setting described above has been a rich environment for humans for thousands of years. The region is the traditional home of the Owens Valley Paiute or Nüümü, whose oral histories place them in Owens Valley (Payahuunadü) and the surrounding mountains since the beginning of time. Euroamericans began settling in Owens Valley in the nineteenth century, and they, too have left traces of their occupation in archaeological sites and features.

Under CCR Title 14 Section 15064.5, a project could have a significant impact on the environment if it would entail a substantial adverse change to a significant historical, archaeological, or tribal cultural resource. Significant historical and archaeological resources include those that are listed on, or eligible for listing on, the California Register of Historical Resources (Public Resources Code Section 5024.1). According to these criteria, a site, building, structure, or district is a historical resource if it: a) is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; b) is associated with the lives of persons important in our past; c) embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or d) has yielded, or may be likely to yield, information important in prehistory or history.

Tribal cultural resources are defined as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. Only Tribes can identify and evaluate historic properties of traditional cultural or religious significance, but in the past, representatives of several of the Tribes of Owens Valley have stated that they view all of creation, including the air, water, animals, plants, and earth, as Tribal cultural resources.

The Lone Pine landfill has been identified as a "noncontributing resource" within the proposed boundary of the Patsiata Historic District, currently being nominated to the National Register of Historic Places by the Tribal Historic Preservation Officers of five Tribes with ties to Owens Valley. The waterline easement to the Lone Pine landfill would follow Sub Station Road, part of which follows the northern boundary of the Lone Pine Paiute-Shoshone Reservation. The proposed easement also crosses a multi-component site that is considered a contributing element of the Historic District.

Most aspects of the proposed Project would cause little or no change in the existing environment, and so are unlikely to cause a substantial adverse change to a significant historical, archaeological, or tribal cultural resource. However, activities that would disturb previously undisturbed ground, such as the trenching for water lines within the proposed easements, would need surveys, monitoring, and/or avoidance measures to ensure the impacts to cultural and tribal resources remain less than significant (see Section V, Cultural Resources).

ARCHAEOLOGICAL SURVEY OF WATERLINE EASEMENTS

To assess whether the establishment and purchase of easements along existing roads in Independence and Lone Pine for extension of the town water systems to the respective landfills would have potential to impact such resources, TEAM Environmental, Inc., conducted both a records search and field survey of the proposed easement alignments, in October 2023.

The records search was provided by the regional office of the California Historical Resources Inventory System (CHRIS) at the Eastern Information Center (EIC), University of California, Riverside. As the designated information center for Inyo, Mono, and Riverside counties, the EIC maintains copies of archaeological reports and site records for the area.

Part of the proposed easement route from Independence to the Independence Landfill was surveyed for the Digital 395 Project and for replacement of the Southern California Edison (SCE) 115 kilovolt (kV) transmission line. Multi-component archaeological sites, consisting of Indigenous artifacts and twentieth-century trash, were recorded in the vicinity, but not in the waterline easement Project area. Mazourka Canyon Road itself was considered significant for its role in the Euroamerican development of the Owens Valley and Inyo Mountains.

Previous archaeological surveys had been conducted in the vicinity of the proposed Lone Pine waterline easement for various projects, including fuels treatment, a sewer line, the Owens River Water Trail Project, and proposed replacement of the SCE transmission line. A variety of pre-contact Indigenous artifacts was found, as well as twentieth-century features related to the railroad and ranching. The waterline easement would cross one of the sites that is considered a contributor to the Patsiata Historic District. Not surprisingly for an area on the outskirts of a small town and adjacent to the modern landfill, the surveys encountered an enormous amount of trash, most of it interpreted as trash dumps of domestic household refuse. In addition, the Lone Pine Pioneer Cemetery is located south of Sub Station Road and east of the Lone Pine Paiute-Shoshone Reservation.

The proposed waterline easements were surveyed by TEAM's senior and assistant archaeologists in October 2023. Although each easement is expected to be only 6 feet wide, a corridor approximately 50 feet wide centered on the access roads was surveyed to ensure adequate coverage. When an artifact or feature was encountered, the adjacent area was surveyed to determine if it was part of a site or an isolated find.

Both access routes have a fair amount of modern roadside litter. Items noted but not recorded in detail included aluminum cans, beverage cans with aluminum tops, cardboard, clothing, Styrofoam, plastic, modern bottle and bottle fragments, window glass, wire, lumber fragments, concrete block, glazed tile fragments, cinders, flagstone, and tires.

Along the Independence survey corridor, vegetation is sparse and ground visibility was good, with an estimated 60 to 90 percent of the ground surface visible. There were no previously recorded sites within the Independence easement survey, so all artifacts that were at least 50 years old encountered there were plotted with an Android GIS mapping program. These included two obsidian flakes, food and beverage cans, cone-top beer cans, pipe fragments, bottle fragments, one whole bottle, and a 1973 penny. With the exception of 19 church-key-opened beer cans, these artifacts occurred as isolated finds. In addition, two irrigation ditches cross the easement alignment.

Dense grasses and gravel in the road shoulders obscured some areas along the Lone Pine survey corridor, with visibility of the ground surface varying from 0 to 90 percent. All of the artifacts encountered during the Lone Pine easement survey were consistent with the previously recorded sites, and included food and beverage cans, glass fragments, wire, and abundant modern trash.

One small dump with small fragments of metal and clear and sun-colored amethyst glass was noted as a potential addition to the previously recorded twentieth-century trash scatters. This trash concentration is located 20 feet east of the road pavement and so would be outside of the proposed easement. In addition, there are irrigation ditches throughout the area and one ditch crosses under the road through a culvert with concrete headwalls. No pre-contact Indigenous artifacts, such as pottery or flaked or ground stone, were observed in the proposed alignment, even within the multi-component archaeological site that is considered a contributor to the Historic District.

GROUND-DISTURBING ACTIVITIES DURING LANDFILL OPERATIONS

The proposed Project does not include expansion of the landfill facilities into areas of undisturbed ground, with the exception of designated soil borrow areas that are necessary for final waste cover during landfill closure activities. The approved PCPCMPs (closure plans) detail any areas designated for future excavation and borrow soils, and are required to be reviewed and updated periodically through the life and closure period for these landfills. The recently updated PCPCMPs are included in the Joint Technical Documents (Geo-Logic Associates 2022, 2023a, 2023b) that are currently going through the multi-agency review process required every five years for permitting of landfill facilities in California.

Waste disposed at the landfills is also required to be covered with soil for daily and intermediate cover, most of which is excavated from designated areas of the landfills (or disposed as clean fill).

These excavation activities have the potential to uncover currently unknown historic, or paleontological resources.

5.0 EVALUATION OF ENVIRONMENTAL IMPACTS

5.1 METHODOLOGY

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the existing information sources.
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 New 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 "Earlier Analyses," as described in (5) below, may be cross-referenced).
    a. 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:
    b. Earlier Analysis Used. Identify and state where they are available for review.
5. 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.
6. Mitigation Measures. For effects that are "Less Than Significant With New 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.
7. 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.
8. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

9. 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.
10. 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.

5.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by the purchase and continued operation of the three subject Landfills by Inyo County, including at least one involving at least one impact that is a "Less than Significant Impact", "Less than Significant with New Mitigation Incorporated" or "Potentially Significant Impact" as indicated by the checklist and discussed on the following pages. Where environmental impacts were found to be "Less than Significant with New Mitigation", the new mitigation measures are defined and discussed within each section.

☒	Aesthetics	☐	Agriculture and Forestry Resources	☒	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Energy
☒	Geology and Soils	☒	Greenhouse Gas Emissions	☒	Hazards and Hazardous Materials
☒	Hydrology and Water Quality	☒	Land Use and Planning	☒	Mineral Resources
☒	Noise	☐	Population and Housing	☐	Public Services
☐	Recreation	☐	Transportation and Traffic	☒	Tribal Cultural Resources
☒	Utilities and Service Systems	☒	Wildfire	☒	Mandatory Findings of Significance

5.3 ENVIRONMENTAL IMPACTS CHECKLIST AND DISCUSSION

This checklist identifies potential environmental impacts that could result from the implementation of the proposed acquisition of fee title for continued operation of the three County landfills, in all required environmental categories and subsections. Where the determination was "Less Than Significant With New Mitigation Incorporated," a discussion of new (proposed) mitigation measures is included.

I. Aesthetics

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

DISCUSSION

a) **Less Than Significant Impact.** The potential for impacts to aesthetics and visual resources associated with the continued operation and eventual closure of the landfills, were previously analyzed in the 1999 MNDs for the three landfills. Each of these MNDs determined that the operation and eventual closure of the landfills would not result in significant environmental impacts. Under the proposed Project, any vertical extension of the landfills would continue to be limited by slope stability standards and permit conditions, and would result in a less than significant impact on scenic vistas (e.g., Sierra Nevada or White-Inyo Mountains). Additionally, while trenching and construction of waterlines within the proposed easements could result in short-term, temporary impacts to scenic vistas, following the completion of construction, these buried lines would have no long-term, operational impacts.

b) **Less Than Significant Impact.** The three landfills are located within the viewshed of Highway 395, which is eligible to be included in the State Scenic Highway System, and portions of which are designated as a scenic highway by the California Department of Transportation (Caltrans). However, these three landfill sites were in existence before the scenic designation. Further, none of the landfill properties or the proposed easements are within the viewshed of any of the State Scenic Highway sections (Caltrans 2022). The proposed land transfer for continued solid waste disposal operation would not affect any of the scenic elements or any of the scenic views provided from Highway 395. Therefore, the implementation of the proposed Project would have a less than significant impact on visual resources.

c) **Less Than Significant Impact.** Under the proposed Project, there would be no change in visual character of the Landfills. Continued operation of the landfills may result in impacts to aesthetics and visual resources during active filling operations, as described in the 1999 MNDs. However, existing minimization measures to address these potential impacts include daily, intermediate, and final cover of waste, and control of wind-blown trash, which are currently implemented by the County as the operator of the Landfills and would continue to be implemented by the County under the proposed Project. Following closure of the Landfills, the sites would be reclaimed according to approved closure plans. As described in the 1999 MNDs, vertical expansion of the Landfills would be limited to the approved site grading and closure plans. With these minimization and compliance measures, continued operation of the Landfills under County ownership would be less than significant. While trenching and construction of water lines within the proposed easements could result in short-term, temporary impacts to visual character, following the completion of construction, these buried lines would have no long-term, operational impacts.

d) **No Impact.** All activities associated with the existing and continued operation of the Landfills would be limited to daylight hours only. There are no substantial sources of light associated with the Landfills.

II. Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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])?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

DISCUSSION

a-e) **No Impact.** The proposed acquisition, proposed easements, and continued operation of the three landfills under the proposed Project would not conflict with existing zoning for agriculture. There are no Williamson Act Contracts at or around the Landfills (California Department of Conservation 2022). The well for Bishop-Sunland Landfill is located on an agricultural field; however, no changes to groundwater use associated with the landfill would occur under the proposed Project. The groundwater well located at this site is existing and already plumbed and dedicated to landfill use. No farmland, agricultural land or forest is proposed to be converted as a result of the proposed Project. Further, the proposed Project does not propose any expansion of landfill footprints.

III. Air Quality

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

DISCUSSION

a) **Less Than Significant Impact.** The Independence and Lone Pine Landfills are located within the Owens Valley PM_{10} SIP boundaries (GBUAPCD, 2022). Continued operation of the landfills is not

expected to increase PM_{10} emissions beyond existing levels. In addition, obtaining ownership of the landfills would enable the County to provide on-site water supplies through pipeline easements from the town water supply systems at the Independence and Lone Pine Landfills, which could enable further reduction of PM_{10} emissions through more consistent application of water for dust-abatement during operations. Therefore, the acquisition and continued operation of the landfills under the proposed Project would not conflict with or obstruct the SIP.

b) **Less Than Significant Impact.** Inyo County, which is located within the GBUAPCD, is designated as a nonattainment area in the Owens Valley Dry Lake area for PM_{10} (USEPA 2022). Implementation of the proposed Project would result in the continued operation of the existing landfills in compliance with applicable laws, regulations, and permits for solid waste facilities. There would be no changes in operational air emissions, including fugitive dust, treatment system emissions, and equipment emissions. Operations of the landfill typically incorporate all reasonable precautions required by the GBUAPCD (e.g., Rule 401 – Fugitive Dust). As such, emissions would not approach the NAAQS established by the USEPA or the California Ambient Air Quality Standards (CAAQS) established by the California Air Resources Board (CARB). However, it should be noted that the Independence and Lone Pine Landfills currently do not have a water supply well for on-site operations and dust control, water must be trucked to the site. With the proposed acquisitions of easements for future connection to town water systems in Independence and Lone Pine, Inyo County would improve the reliability and timeliness of water applications during wind events, thus increasing the effectiveness of dust-control measures.

c) **Less Than Significant Impact**. A portion of Inyo County, located in the GBUAPCD, is designated as a nonattainment area for PM_{10}, and dust control measures are intended to reduce the net increase of PM_{10}. The Independence and Lone Pine Landfills, both located within the nonattainment area, do not currently have an on-site source of water and are reliant on trucking water from an off-site source to control dust during wind events. The proposed Project, which includes easements for future extension of water supply lines to the Independence and Lone Pine Landfills, has the potential to have a beneficial reduction in PM_{10} due to landfill operations, due to increased availability of water as a dust-suppression mechanism.

The venting of LFGs is an active corrective action mechanism at Bishop-Sunland, and a foreseeable corrective action mechanism at Independence and Lone Pine Landfills. When LFG venting occurs, the vents are subject to a Permit to Operate issued by the GBUAPCD with filtration to remove VOCs, where necessary. The proposed change in property ownership would have no impact on compliance with locally issued air quality permits.

d) **No Impact.** No sensitive receptors (e.g., residential areas, schools, hospitals, etc.) are located within close proximity (e.g., with a 0.75-mile radius) to any of the three landfills or any of the proposed easements.

e) **Less Than Significant Impact.** Existing septage ponds at the Bishop-Sunland Landfill cause odor. Methane is also extracted and vented to the environment at the Bishop-Sunland Landfill. However, each of the existing landfills are located in areas of limited development in unincorporated areas of the County. As previously described, no sensitive receptors are located within close proximity to the three landfills. Additionally, the application of daily cover over the

exposed waste, as required by CalRecycle and permit conditions, generally acts to suppress objectionable odors.

The existing minimization and compliance measures with respect to air quality are considered to be sufficient to reduce impacts to a less than significant level without additional mitigation. The key compliance measures are presented in Table 1 and summarized below:

1. Dust control through application of water, as needed, to landfill roads and active working faces.
2. Control of emissions from landfill gas venting, through permitting with the GBUAPCD.

IV. Biological Resources

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
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 wetlands, etc.), through direct removal, filling, hydrological interruption or other means?	☐	☒	☐	☐
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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

DISCUSSION

a) **Less Than Significant Impact With New Mitigation Incorporated.** Appendix C lists the special-status species with the potential to occur at each of the landfill sites based on previous occurrence in close proximity. However, due to the disturbed nature of the landfills, lack of mature native vegetation and absence of riparian habitat or surface water it is unlikely that any of these species would find suitable habitat at any of these sites. With the implementation of MM BIO-1, the construction of waterlines within the proposed easements would not occur without a pre-construction sensitive plant and wildlife survey. With the implementation of pre-construction surveys and the avoidance of special-status species and their habitats, potential impacts would be reduced to a less than significant level.

b, c) **Less Than Significant Impact With New Mitigation Incorporated.** As previously described, no surface water, wetlands or riparian habitat or other sensitive natural communities occur on the landfills or in the immediate vicinity. The Owens River occurs 0.1 to 0.05 miles from the Lone Pine Landfill. National Wetland Inventory maps can be found in Appendix B and the sensitive natural communities located in proximity to the Landfills are listed in Appendix C. With the implementation of MM BIO-1, the construction of the proposed waterlines would not occur without a pre-construction sensitive plant and wildlife survey. With the implementation of pre-construction surveys and the avoidance of sensitive natural communities, potential impacts would be reduced to a less than significant level.

d) **Less Than Significant Impact.** No migratory corridors or native wildlife nursery sites are known around the existing landfills or proposed easements. Additionally, there would be no new disturbance or expansion of landfill boundaries under the proposed Project that could affect migratory corridors or native wildlife nursey sites.

e) **No Impact.** The existing landfills are operated in compliance with all local policies or ordinances intended to protect biological resources.

f) **No Impact**. With the exception of the Owens Valley Land Management Plan (LADWP 2010), there are no known Habitat Conservation Plans, Natural Community Conservation Plans or other approved local, regional, or state habitat conservation plan that cover the Project site, including the Landfills and the proposed easements. The proposed Project does not conflict with the Owens Valley Land Management Plan. The Lower Owens River Project, a river restoration project in close proximity to the Lone Pine Landfill includes a Land Management Plan element. However, continued operation of the Lone Pine Landfill would not conflict with its provisions.

MITIGATION MEASURES

BIO-1: PRE-CONSTRUCTION BIOLOGICAL RESOURCE SURVEYS

Prior to the construction of the proposed waterlines, the County shall conduct a pre-construction survey for wildlife and botanical resources. The botanical survey shall follow the protocols set forth in the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (California Department of Fish and Wildlife [CDFW] 2018). The surveys shall be conducted by a botanist(s) experienced in conducting floristic botanical field surveys, knowledgeable of plant taxonomy and plant community ecology and classification, familiar with the plants of the area, including special status and locally significant plants, and familiar with the appropriate state and federal statutes related to plants and plant collecting. The botanical surveys shall be conducted at the appropriate time of year when plants will both be evident and identifiable (usually, during flowering or fruiting) and, in a manner, which maximizes the likelihood of locating special status plants and sensitive natural communities that may be present. Botanical field surveys shall be conducted floristic in nature, meaning that every plant taxon that occurs in the Project area is identified to the taxonomic level necessary to determine rarity and listing status.

If any rare plants or sensitive vegetation communities (including riparian and wetland) are identified, the County shall avoid the occurrence.

BIO-2: NESTING BIRD SURVEYS AND MONITORING

Construction activities that may directly (e.g., vegetation removal) or indirectly affect (e.g., noise/ground disturbance) nesting raptors and other protected avian species shall be timed to avoid the breeding and nesting seasons (generally, raptor nesting season is January 1 through September 15; and passerine bird nesting season is February 1 through September 1). If construction activities must occur during the breeding and nesting season (February 1 through September 15), a qualified biologist shall conduct pre-construction surveys for nesting raptors and other protected avian species within 300 feet of the proposed construction activities. Preconstruction surveys should be conducted no more than 7 days prior to the start of the construction activities. If nests are found, their locations shall be flagged, and all work shall cease until a qualified biologist determines the young birds have fledged or an appropriate buffer has been demarcated. An appropriate avoidance buffer ranging in size from 100 feet for active passerines (perching birds) nests, and up to 300 feet for active non-listed raptors nests, and 0.5 miles around active nests of a state or federally listed bird species. (depending upon the species and the proposed work activity) shall be determined and demarcated by a qualified biologist with bright orange construction fencing or other suitable flagging. These buffers shall be maintained, and active nests shall be monitored at a minimum of once per week until breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. These buffers shall be increased to protect the nesting birds, if necessary, as determined by a qualified biologist. No ground disturbance or vegetation removal shall occur within this buffer until the qualified biologist confirms the breeding/nesting is over and all the young have fledged. If no nesting birds are observed during pre-construction surveys, no further action would be necessary.

V. Cultural Resources

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
Cultural Resources				
Would the Project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

DISCUSSION

a, b, c) **Less Than Significant With New Mitigation Incorporated.** Landfill operations occur, and would continue to occur, within the existing footprint of the three landfills. The existing landfills have been previously disturbed during original siting of the landfills and there are no proposed changes to the footprint of the landfills. As such, there would be a low potential to encounter previously unknown buried archaeological resources pursuant to CEQA Guidelines Section 15064.5 or human remains, during ongoing landfill operations.

The purchase of easements along the existing access roads would not in itself have the potential to cause significant impacts on cultural or Tribal cultural resources. There is no indication of buried cultural resources along the proposed Independence easement corridor, and no pre-contact Indigenous artifacts were encountered in the proposed Lone Pine easement corridor. Nevertheless, the Lone Pine waterline would cross a previously recorded site that is considered a contributor to the Patsiata Historic District. Monitoring of the Lone Pine trenching by a Tribal monitor, and implementation of standard avoidance measures should anything significant buried cultural resources be encountered during construction, would ensure the trenching causes no significant impacts.

The proposed Project does not include any expansion of the landfill facilities into areas of undisturbed ground, with the exception of designated borrow areas that are necessary for waste cover and future landfill closure activities. The updated Preliminary Closure and Post-Closure Monitoring Plans (Geo-Logic Associates 2022, 2023a, 2023b) detail any areas designated for future excavation and borrow soils, and are required to be reviewed and updated periodically through the life and closure period for the Landfills. Waste disposed at the Landfills is also required to be covered with soil for daily and intermediate cover, most of which is excavated from designated areas of the landfills (or disposed as clean fill).

Because of these routine and non-routine excavation activities associated with continued operation as waste disposal facilities, there is the potential for inadvertent discoveries of historic, pre-historic, or paleontological resources which are not currently known. To assure that potential impacts to tribal and cultural resources remain less than significant from the proposed Project, the

County is committed to the implementation of a Worker Awareness and Notification Plan. Additionally, the County is committed to the notification to the local tribe(s), at least 2 weeks prior to any non-routine ground-disturbing activities, to provide an opportunity for Tribal monitoring during construction.

MITIGATION MEASURES

CUL-1: TRIBAL MONITORING OF EXCAVATION FOR THE LONE PINE WATERLINE

For Lone Pine Landfill, the waterline easement as currently proposed would cross a previously recorded archaeological site that is considered a contributing element of the Patsiata Historic District, a traditional cultural property determined eligible for listing in the National Register of Historic Places. Therefore, Tribal monitoring is recommended when trenches for the waterlines are excavated from Lone Pine to the Lone Pine Landfill. The Tribal Historic Preservation Officer of the Lone Pine Paiute-Shoshone Reservation shall be notified at least 2 weeks prior to trenching so that trained tribal monitors can be scheduled. An Inadvertent Discovery Plan shall be developed in conjunction with Lone Pine Paiute-Shoshone Reservation to establish sampling, and/or treatment of resources if encountered during trenching activities, in accordance with local and state laws.

CUL-2: WORKER AWARENESS TRAINING

A Worker Awareness Program, including clarification of laws and regulations governing cultural and tribal resources, will be implemented by Inyo County for landfill workers. This Worker Awareness Program will include a list of activities that would trigger notification to local Tribes or authorities, in accordance with local, state, and federal laws concerning the protection of cultural tribal, and paleontological resources.

VI. Energy

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

DISCUSSION

a, b) **No Impact**. The proposed acquisition and continued operation of the Landfills would not affect energy usage given that there would be no changes in existing operations.

VII. Geology and Soils

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
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.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
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?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

DISCUSSION

a, i) **Less Than Significant Impact.** Although the Landfills are located within Seismic Zone IV (greatest potential for seismic activity), no active faults are known to occur at the Independence and Lone Pine Landfills. The flat surrounding terrain, mild landfill slopes, cohesive waste mass and lack of structures minimize the potential for substantial adverse effects. With the exception of the Bishop-Sunland Landfill, the sites are located outside of known earthquake fault zones as shown on the most recent Alquist-Priolo Earthquake Fault Zoning Maps (Appendix D).

At the Bishop-Sunland Landfill a fault is identified to cross the eastern portion of the site. The proposed Project would neither increase nor decrease the risk of a fault rupture. The 1999 MNDs

established mitigation measures to reduce the risk to humans or structures (to a less-than-significant level) in the event that the active fault across the site ruptures:

- The landfill slopes and features were analyzed and designed in compliance with applicable regulations to withstand seismic loading conditions without significant failure. The landfill slopes have been designed flatter (4:1) than normal (3:1) as a result of slope stability analysis to minimize risk of seismic failure.
- No structures will be located in areas where waste has been placed, nor will any structures be located within 25 feet of waste limits.
- No structures within 50 feet of the fault zone, based on a site-specific Alquist Priolo investigation.

Although these mitigation measures were deemed sufficient in the previous MNDs and required to be implemented over the active life of the landfill, the mitigation measures may need to be re-assessed with updated fault location information. In 2019, Geo-Logic Associates prepared a "Site Response and Seismic Deformation Analysis," and in 2021, a "Postulated Fault Rupture Impact Evaluation Report" for the Bishop-Sunland Landfill. The updated information provided in those reports, and a cursory review of mitigation measures to reduce impacts from seismic activity, was conducted. Based on the recent information and projection of the fault trace at the Bishop-Sunland Landfill, the maintenance shop may be within 50 feet of the fault zone. As a result, the County is planning to relocate the maintenance shop to the western side of the gatehouse / landfill entrance (as part of a separate project).

a, ii) **Less Than Significant Impact.** The landfill slopes and features were analyzed and designed in compliance with applicable regulations to withstand seismic loading conditions without significant failure. The landfill slopes have been designed flatter (4:1) than normal (3:1) as a result of slope stability analysis; this would minimize any potential impacts.

a, iii) **No Impact.** Soils at the existing sites primarily consist of granular sands with some gravel and silt content. Unstable soils and soils subject to liquefaction do not appear in site boring logs, excavations or surfaces. Additionally, no surface water bodies occur on any of the landfill sites.

a, iv) **No Impact.** The landfills are located on relatively level sites. Landfill slopes and features have been analyzed and designed to withstand seismic loading conditions without significant failure in compliance with Stability Analysis required by State Water Resources Control Board (SWRCB) Section 20190(a)(6) and CCR Section 21145, 21790(b)(8)(B).

b, c) **Less Than Significant Impact.** Landfill operations typically require excavation and substantial ground-disturbing activities that alter the existing topography of the landfill. Erosion is possible, however, landfill design requires that stormwater does not run off-site. Therefore, erosion and silt would continue to be contained on-site and would be considered a less than significant impact to geology and soils. Measures have been implemented at the Landfills such as compacting soil surfaces and installing retention basins and/or berms to minimize erosion and the quantity of suspended solids discharged off-site.

d) **No Impact.** Soils at the Landfills primarily consist of granular sands with some gravel and silt content. Expansive soils are not in evidence in site bore logs, excavations, site surfaces, or results of geotechnical testing of on-site soil samples.

e) **No Impact.** The Bishop-Sunland Landfill has a septic tank to service the employees on site. No leach field is present, wastewater is pumped and treated on-site in the septage ponds. The use of septic tanks or alternative wastewater disposal systems does not occur and is not proposed at any of the Landfills.

VIII. Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

DISCUSSION

a, b) **Less Than Significant Impact.** Landfills do have the potential to generate greenhouse gas (GHG) emissions. However, as with operational criteria air pollutant emissions described in Section II, *Air Quality*, the operation of the landfills and the associated operational GHG emissions would not change as a result of the proposed Project.

The proposed construction of the waterlines to Independence and Lone Pine Landfills would result in GHG emissions. However, these emissions would be short-term and temporary. For example, the duration of the construction activities would be limited to a few weeks. Additionally, construction equipment emissions (e.g., trencher, excavator, trucks) would be minimized with compliance with current guidelines established by the California Air Resources Board (e.g., vehicle idling is limited to 5 consecutive minutes or less) (CARB 2024). GHG emissions would be well below the conservative California Air Pollution Control Officers Association (CAPCOA) significance threshold of 900 metric tons per year of carbon dioxide equivalent (MT/yr CO_2e). Additionally, the proposed Project would not conflict with any applicable plans, policies, or regulations.

IX. Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

DISCUSSION

a) **Less Than Significant Impact.** Disposal of hazardous materials is strictly prohibited by permit conditions for the three Inyo County Landfills. Mitigation measures identified in the 1999 MNDs (see Table 1) have been implemented to detect and discourage hazardous waste disposal,

including gate attendants and a load checking program. The Bishop-Sunland Landfill accepts non-friable asbestos for disposal under specific state permit requirements issued by the LRWQCB. Septage is randomly sampled and dried, treated septage sludge is also sampled before disposal as required by the ICEHD and LRWQCB. Landfill operation activities would continue to require short-term use of heavy construction equipment involving limited quantities of potentially hazardous materials, including transportation and use of fuel, oil, and other common hazardous materials. Short-term uses of limited quantities of hazardous materials would continue to be confined to the landfill lease areas. The use of potentially hazardous materials would be regulated by health and safety requirements under federal, state, and local regulations, including handling, storage, and disposal of the materials, as well as emergency spill response.

Asbestos and gasoline impacted soils are accepted at Bishop-Sunland. Impacts are less than significant due to the acceptance procedures and following of state (CalRecycle and LRWQCB) regulations designed to minimize impacts.

Hazardous waste is not accepted at any of the landfills, except on designated Household Hazardous Waste (HHW) days where licensed hauling and removal of HHW occurs. This category of waste is not landfilled and is disposed of off-site at authorized facilities.

No new mitigation measures are currently proposed, since Inyo County is committed to continuing the prevention and minimization measures in compliance with current regulations prohibiting the disposal of hazardous materials at these three Class III Landfills.

b) Less than Significant Impact. As discussed above in Section IX.a, disposal of hazardous materials is strictly prohibited by permit conditions for the three landfills. The proposed Project would not have a negative or positive impact on the risk to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c) No Impact. Landfilling of hazardous materials is prohibited at the existing landfills. Additionally, the sites are more than 1 mile from any existing or proposed school. Therefore, there is no potential for the proposed Project to affect an existing or proposed school.

d) No Impact. The sites associated with this proposed Project are not on any list of hazardous materials sites.

e) Less Than Significant Impact. The location and operation of the landfills are consistent with the County's adopted Airport Comprehensive Land Use Plan. Bishop-Sunland Landfill is over 2 miles from the Bishop Airport, Independence Landfill is approximately 1.9 miles from the Independence Airport, and the Lone Pine Landfill is approximately 0.5 miles from the Lone Pine Airport.

f) No Impact. There are no private airstrips within 2 miles of the sites.

g) No Impact. The acquisition and continued operation of the Landfills are not expected to impact, or physically interfere with an adopted emergency response or evacuation plan.

h) No Impact. The existing Landfills are located in relatively undeveloped areas of un-incorporated Inyo County. The large areas of bare soil cover on site surfaces and roads should

inhibit rather than enhance fire propagation. The continued operation of the Landfills by the County under the proposed Project would not increase or otherwise affect wildfire risk.

X. Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☒	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a failure of a levee or dam?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami or mudflow?	☐	☐	☐	☒

DISCUSSION

a, f) **Less Than Significant Impact With New Mitigation Incorporated.** LRWQCB has issued WDRs, which include quarterly (for Bishop-Sunland) and semi-annual (for Independence and Lone Pine) monitoring and reporting programs for each of the landfills. Inyo County operates these three existing facilities in general compliance with these WDRs, with semi-annual compliance reporting to the LRWQCB. The Bishop-Sunland and Lone Pine Landfills currently exceed water quality standards for VOCs, which according to the WDRs has elevated these sites to Corrective Action and Evaluation Monitoring Programs, respectively. The Bishop-Sunland Landfill has one or more monitoring wells which exceed Maximum Contaminant Levels (MCLs) for Drinking Water, most notably the wells in a hydraulically up-gradient direction (west) of the landfill which could indicate contamination from LFGs migrating in an up-gradient direction, as well as the potential for contamination from adjacent properties. Bishop-Sunland is under an active Corrective Action Program, with venting of landfill gas the primary mechanism to reduce VOCs in groundwater. Lone Pine Landfill is under an Evaluation Monitoring Program due to low-level VOC impacts to groundwater. LFG extraction, or other corrective action, may be required (by LRWQCB) or proposed at the Lone Pine Landfill, to alleviate potential impacts to groundwater from the generation of landfill gas. Monitoring programs and mitigation measures required in the 1999 MNDs are in place and are currently being implemented by the County to minimize the potential for leachate and LFG impacts to groundwater at the landfills (see Table 1). These measures include load checking, application and compaction of daily cover soil, grading surfaces to promote lateral drainage and active vents to reduce impacts from LFG to groundwater. With the proposed Project (change of property ownership and continued operation by Inyo County), water quality standards would continue to be exceeded, monitored, and addressed according to the active WDRs. However, with the ownership of title for these properties, the County would be able to more effectively work with the LRWQCB to update and prove compliance with the WDRs, as well as implementing appropriate corrective actions, if necessary, in a more appropriate timeline than previous lease conditions have allowed.

As unlined Class III Landfills, impacts to groundwater by VOCs and other regulated compounds could be considered an unavoidable impact of continued landfill operations. The significance of this impact is dependent on implementation of key mitigation and corrective action measures over the life of the landfills and for a 30-year post-closure period. As the County is committed to continued operation of these landfills in compliance with permit conditions established by the WDRs and other regulations, implementation of MM HYD-1 would reduce the potential impacts to groundwater from the proposed Project to a less-than-significant level.

b) **Less Than Significant Impact.** No new groundwater production to supply water for the landfill facilities is proposed as part of the proposed Project. However, the purchase agreement would

include an exchange of water to LADWP for the continued use of the supply well at the Bishop-Sunland Landfill, in an amount of approximately 7 AFY. An evaluation of pumping impacts from this proposed water exchange agreement by LADWP, provided in Appendix A, indicated no significant impact from pumping of the additional amounts within the same recharge basin. Groundwater pumped by the County to replace water supplied to the Bishop-Sunland Landfill will be used by LADWP on LA-owned lands downstream of the well on the Bishop Cone as required by the Hillside Decree and the Inyo County/Los Angeles Long Term Water Agreement.

For the Independence and Lone Pine Landfill sites, the source of water used at these facilities (for dust control only) is groundwater pumped to supply the town water systems at Independence and Lone Pine. This water is currently trucked to the sites, but the purchase of easements to allow for the construction of waterlines and connection to the town water systems would allow the County to continue to use the same water source, but to discontinue trucking. in the future. No significant increase in the amount of groundwater pumping is proposed, and thus impacts would be less than significant.

c, d) **Less Than Significant Impact.** The proposed Project would not result in the course alteration of any streams or rivers. The landfills have been in existence for over 50 years (57 years for the Independence and Lone Pine Landfills and 67 years for the Bishop-Sunland Landfill). As a result, localized drainage patterns have been established. Stormwater Pollution Prevention Plans (SWPPPs) are in place and measures have been implemented (e.g., compacting soil surfaces and installing retention basins to minimize erosion and the quantity of suspended solids discharged off site). Upon closure, the sites would be revegetated to minimize erosion.

e) **No Impact**. The capacity of on-site drainage systems would not be exceeded at the Landfills. Drainage controls have been analyzed, designed, and implemented at the landfills, including installation of retention basins.

g) **No Impact.** The construction of housing is not proposed and the implementation of the proposed Project would not facilitate future growth.

h, i, j) **No Impact.** The Landfills are not located within an identified 100-year flood hazard area. The continued operation of the Landfills would not increase or otherwise affect flood hazard in the area.

MITIGATION MEASURES

HYD-1: WATER QUALITY MONITORING AND CORRECTIVE ACTION

With the change in ownership of the Landfills, Inyo County shall operate in compliance with permit conditions established by WDRs and monitor the underlying groundwater basin using methodologies and at locations developed in consultation with LADWP and in coordination with the LRWQCB. If maximum contaminant levels, water quality standards, or water quality objectives are exceeded, Inyo County shall be required to develop corrective action(s) necessary to bring the water quality into compliance with applicable standards and avoid adverse effects on regional water quality. Corrective measures may include, at a minimum, venting of landfill gas to reduce VOCs, expansion of the landfill gas extraction systems, or other corrective action as may be required by the LRWQCB.

XI. Land Use and Planning

	Potentially Significant Impact	Less Than Significant with New Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

DISCUSSION

a) **No Impact.** As previously described the Landfills are located in generally undeveloped areas of the unincorporated County. The proposed Project would be limited to the acquisition of fee title by the County for the subject properties, operation of each of these essential public facilities would be continued by the County. No expansion of the Landfills is proposed.

b) **Less Than Significant Impact.** The operation of the Landfills was previously evaluated in the 1999 MNDs, and the change in ownership is not anticipated to have a significant impact on Land Use or Planning in Inyo County. Existing and continued landfill operations are in compliance with the County General Plan; however, rezoning and issuance of a Conditional Use Permit for each site may also be necessary to remain in compliance once the transfer of property ownership is complete. The definition of easements along existing roads, and sale by LADWP to Inyo County of these easements, is not anticipated to conflict with any other land use designations.

For Independence Landfill, the western boundary of the proposed parcel for sale to Inyo County has been modified (from the current LADWP lease), to exclude mineral extraction and mixing-table areas to the West of the landfill that are regulated under SMARA. A modification of the SMARA boundary may also be necessary once the parcel definition and purchase agreement(s) are finalized.

c) **No Impact.** As previously described, the proposed acquisition would require rezoning; however, rezoning and continued operation of the exiting landfills would not affect the implementation of any habitat conservation plan or natural community conservation plan. With the exception of the Owens Valley Land Management Plan (LADWP 2010), no habitat conservation plan or natural community conservation plans exist at the Project locations. The Lower Owens River Project, a Habitat Restoration Project, occurs in close proximity to, but not at, the Lone Pine Landfill. The proposed Project does not conflict with the Owens Valley Land Management Plan.

XII. Mineral Resources

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

DISCUSSION

a) **Less Than Significant.** Saleable minerals (e.g., decomposed granite, sand/gravel) are located on and around the landfills. Use of this material on-site for daily cover soil will limit the availability for other uses regionally. However, the material is in local abundance in the areas around the landfills. The amount of soil necessary for operations and closure are not proposed to change as a result of the proposed Project.

b) **Less Than Significant.** No locally important mineral resource recovery sites are identified on the existing landfills. Each of the existing landfills is in compliance with the County General Plan and is consistent with surrounding land uses (or will be with zoning changes). For Independence Landfill, the western boundary of the proposed parcel for sale to the County has been modified (from the current LADWP lease), to exclude mineral extraction and mixing-table areas to the West of the landfill that are regulated under SMARA. A modification of the SMARA boundary may also be necessary once the parcel definition and purchase agreement are finalized. Impacts to the availability of the local resource (sand and gravel) from the proposed Project, including the modification of the SMARA boundary in Independence, is considered to be less than significant.

XIII. Noise

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or of applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

DISCUSSION

a) **Less Than Significant Impact.** The potential impact due to noise from heavy equipment during landfill operations was evaluated in the original MNDs for the landfill facilities. The only impact identified was to workers operating the heavy equipment, and the impacts were determined to be less than significant contingency on a Worker Protection Program that includes the following measures:

- Operators of heavy equipment and other employees shall be provided and trained in the proper use of appropriate noise attenuation safety devices, and
- Inyo County shall implement this measure over the active life of the landfills.

The agencies that are responsible for worker protection programs are the Inyo County Recycling and Waste Management, Inyo County Risk Manager, and the California Occupational Safety and Health Administration (Cal-OSHA). No new mitigation measures are necessary to keep impacts due to noise less-than-significant.

b) **No Impact.** The use of heavy equipment to apply cover may result in some localized groundborne vibration. However, given the lack of development in the surrounding area and the lack of sensitive receptors, localized groundborne vibration would not result in significant impacts.

c, d) **Less Than Significant.** The continued operation of the Landfills would not result in increases in noise levels. The County would continue to ensure operational activities are conducted in compliance with Policy NOI-1.7 in the Public Safety Element of the 2001 Inyo County General Plan (Inyo County 2001). For example, in accordance with Implementation Measure 5.0, landfill operation activities would be limited to the hours 7:00am and 7:00pm to avoid noise impacts to sensitive receptors within 500 feet of maintenance activities. Consequently, noise generated

during routine maintenance activities would not substantially affect the current ambient noise level in the vicinity. There are no residences within 0.75 miles of the Bishop-Sunland Landfill, within 1 mile of the Independence Landfill, and within 0.15 miles of the Lone Pine Landfill.

e, f) **No Impact.** The Bishop-Sunland Landfill is located over 2 miles from the Bishop Airport, the Independence Landfill is located approximately 1.9 miles from the Independence Airport and the Lone Pine Landfill is located approximately 0.5 miles from the Lone Pine Airport. The existing landfills would neither be affected by nor have any effect on airport operations.

XIV. Population and Housing

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

DISCUSSION

a, b, c) **No Impact.** No expansion of the existing boundaries and operations are proposed as part of the proposed Project. Therefore, the implementation of the proposed Project would not increase landfill capacity in a way that would promote growth in the region.

XV. Public Services

	Potentially Significant Impact	Less Than Significant with New Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services.				
a) Fire protection?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

DISCUSSION

a, b, c, d) **No Impact.** The proposed Project would include acquisition and continued operation of the Landfills and would not generate changes in population that would affect public service ratios, school enrollment figures, parkland, etc.

e) **No Impact.** The proposed Project would include acquisition and continued operation of the Landfills. The continued operation of the Landfills would ensure that solid waste services in the County would continue in compliance with current regulations under the authority of three primary permitting agencies: 1) ICEHD, serving as LEA; 2) CalRecycle; and 3) LRWQCB.

XVI. Recreation

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒
c) Substantially conflict with the area's established recreational uses?	☐	☐	☐	☒

DISCUSSION

a, b, c) **No Impact.** The acquisition and continued operation of the Landfills would not impact recreational resources given that there are no existing or proposed recreational facilities within the vicinity of the Landfills.

XVII. Transportation

	Potentially Significant Impact	Less Than Significant with New Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	☒
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

DISCUSSION

a–f) **No Impact**. Traffic volume and patterns related to the proposed Project would remain similar to existing conditions. Inyo County has no current plans to change operating days or hours so no impacts or change to impacts from current conditions are expected as a result of the proposed Project. The construction of waterlines between the town systems and the Landfills has the potential to have a beneficial impact on traffic with the reduction of water truck use for dust control at the Independence and Lone Pine Landfills.

XVIII. Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code § 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	☐	☒	☐	☐
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	☐	☒	☐	☐

a, i, ii) **Less Than Significant Impact With New Mitigation Incorporated.** The Patsiata (Owens Lake) Historic District is eligible for listing in the California Register of Historical Resources as a Traditional Cultural Property, and the boundaries of the proposed historic district include the Lone Pine Landfill and a multi-component site along the Lone Pine Landfill waterline easement route. The Lone Pine Landfill is not considered to be a contributing resource to the Tribal cultural resources that make up the proposed historic district, but the multi-component site is listed as a contributing resource. Tribal monitoring of waterline trench excavation from Lone Pine to the Lone Pine Landfill would ensure no significant impacts to the proposed Historic District as a result of the proposed project.

AB 52, passed in September 2014, has added several sections to the Public Resources Code which pertain to tribal cultural resources and a formal consultation process. The primary purpose of consultation and the changes to CEQA under AB 52 is to allow tribes, who may have "expertise in tribal history and tribal knowledge about land and tribal cultural resources at issue" to be included in environmental assessments for projects that may have a significant impact on those resources. As of July 1, 2015, Public Resources Code Section 21080.3.1 and Section 21080.3.2 require public

agencies to consult with California Native American tribes identified by the NAHC for the purpose of mitigating impacts to tribal cultural resources. On February 1, 2022, Inyo County sent letters inviting formal tribal consultation to the eight tribal governments identified by the NAHC as having traditional lands or cultural places located within the boundaries of the County, through direct mailing in accordance with the Inyo County Tribal Consultation Policy. No formal requests for tribal consultation were received in response to the notification, which Included the NOP and Notice of Public Scoping Meeting. In October 2023, the County sent out an update on the Project Description to local and interested tribes, with an additional offer of formal consultation. No formal consultation has been requested, however Fort Independence Tribe and Lone Pine Paiute-Shoshone Tribe expressed interest in the results of archaeological surveys of the proposed waterline easements, and the opportunity for tribal monitoring during trenching and other non-routine excavation activities associated with waterline construction and landfill operations.

The purchase of easements along the existing access roads would not in itself have the potential to cause significant impacts on Tribal cultural resources. There is no indication along the proposed Independence easement of buried cultural resources, and no pre-contact Indigenous artifacts were encountered in the proposed Lone Pine easement corridor. Nevertheless, the Lone Pine waterline would cross a previously recorded site that is considered a contributor to the Patsiata Historic District. Monitoring of the Lone Pine trenching by a Tribal monitor, and implementation of standard avoidance measures should anything significant be encountered, would help ensure the trenching causes no significant impacts to tribal resources.

The proposed Project does not include any expansion of the landfill facilities into areas of undisturbed ground, with the exception of borrow areas that are necessary for waste cover and landfill closure activities. The approved closure plans detail any areas designated for future excavation and borrow soils, and are required to be reviewed and updated periodically through the life and closure period for these landfills. Waste disposed at the landfills is also required to be covered with soil for daily and intermediate cover, most of which is excavated from designated areas of the landfills (or disposed as clean fill).

Because of these routine and non-routine excavation activities associated with continued operation as waste disposal facilities, there is the potential for inadvertent discoveries of tribal cultural resources which are not currently known. To assure that potential impacts to Tribal cultural resources remain less than significant from the proposed Project, the County is committed to implementing a Worker Awareness and Notification Plan. Additionally, the County is committed to notifying the local Tribe(s), at least 2 weeks prior to any non-routine ground-disturbing activities, to provide an opportunity for Tribal monitoring during construction.

MITIGATION MEASURES

TRI-1: WORKER AWARENESS AND NOTIFICATION PLAN

With the proposed change in ownership of the Landfills, standard avoidance and minimization measures, and proper notification procedures if suspected Tribal cultural resources are inadvertently discovered, should be developed or updated by the County. A Worker Awareness Program, including clarification of laws and regulations governing cultural and tribal resources, shall be implemented by the County. This Worker Awareness Program should include a list of

activities that may require notification to local tribes and an opportunity for Tribal monitoring, as well as an inadvertent discovery plan in case resources are discovered during trenching or other excavation activities.

TRI-2: TRIBAL NOTIFICATION AND MONITORING DURING EXCAVATION

The County shall notify the Lone Pine Paiute-Shoshone Reservation once the construction designs for extension of the waterlines have been developed, and at least 2 weeks prior to trenching for the water lines so that Tribal monitors can be scheduled, if requested by the tribe. The County shall coordinate with the Lone Pine Paiute-Shoshone Reservation to monitor trenching of the waterlines to ensure no Tribal resources are impacted, and that proper procedures are followed in the case of inadvertent discovery of Tribal resources. If human burials are encountered, standard protection and avoidance measures would apply.

Based on the proposed Project and the archaeological survey of the proposed waterline easement, no impacts to tribal cultural resources are anticipated at Bishop-Sunland and Independence Landfill. However, if landfill operations or compliance activities require significant excavation in previous areas, or excavation of previously undisturbed ground, efforts should be made to notify the Bishop Paiute Tribe or the Fort Independence Tribe with an opportunity for Tribal monitoring of excavation activities at the Bishop-Sunland and Independence Landfill and waterline easements (respectively), if requested.

XIX. Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☒	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider that 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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With New Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state and local statutes and regulations related to solid waste?	☐	☐	☐	☒

DISCUSSION

a) **No Impact.** The Bishop-Sunland Landfill has an existing on-site septic system with no leach field that stores domestic wastewater. In contrast, the Independence and Lone Pine Landfills do not have a septic system. This system would be continued to be utilized for the permanent workers at the site and is not proposed to be expanded. Should one of the facilities choose to expand the system, they would be required to follow standard County procedures for septic system development as provided for by the ICEHD.

b) **Less than Significant With New Mitigation Incorporated.** As discussed previously, the proposed Project includes the establishment and purchase of easements, along existing roads in Independence and Lone Pine, to allow for the future extension of the town water supply system to the respective landfills. The excavation of trenches for these waterlines has the potential to have adverse impact on sensitive biological, cultural, and/or Tribal cultural resources if mitigation measures are not implemented. Impacts related to the extensions of waterlines to the Independence and Lone Pine Landfills are anticipated to be less than significant because the County has agreed to the mitigation measures discussed above in Sections IV, *Biological Resources*, V, *Cultural Resources*, and XVIII, *Tribal Cultural Resources*.

c) **No Impact.** The acquisition and continued operation of the Landfills would not result in any changes to stormwater management at any of the Landfills. Implementation of the proposed Project would not require the construction of any new stormwater facilities.

d) **Less Than Significant Impact.** The Bishop-Sunland Landfill would have sufficient water supplies available because the current proposed Project would include continued use of the current supply well that supplies water for on-site uses. However, it should be noted that the water source for the Bishop-Sunland Landfill is designated as non-potable, and that continued use of the current supply well will be contingent on an exchange of equivalent amounts from County-owned property in the City of Bishop, to the LADWP aqueduct conveyance system (canals). For Independence and Lone Pine Landfills, the proposed waterline easements would allow the County to extend the town water supplies to enhance water supply at the Independence and Lone Pine Landfills, replacing the current practice of trucking water to the sites (from the same water source). It is not expected that the limited use of groundwater used at these facilities will impact regional supply wells, LADWP production wells or groundwater dependent resources.

e, f, g) **No Impact.** The continued operation of the existing landfills would comply with all applicable regulations related to solid waste at the federal, state, and local level. Acquisition of the landfills by the County would ensure that the County has the ability to continue to meet all

permit requirements. The proposed Project would not negatively impact the waste management structure of Inyo County, rather, it would ensure the continued availability of solid waste disposal facilities within the region.

XX. Wildfire

	Potentially Significant Impact	Less Than Significant with New Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

DISCUSSION

a, b, d) **No Impact.** The proposed acquisition and continued operation of the existing landfills would not result in any new ignition sources or otherwise, and no changes to operations are considered which would increase the risk of wildfire above existing conditions. Financial assurance mechanisms are required for the Landfills, through non-water release corrective cost estimates that include wildfire damage to the Landfills as a potential causal event. The Landfills are mostly devoid of vegetation and thus should reduce fire risk due to lack of combustible material at the project locations.

c) **Less Than Significant Impact.** Installation of new waterlines in easements to connect the town water supply wells to the Independence and Lone Pine Landfills are not anticipated to cause significant impacts to the environment. The limited use of groundwater from the town water supply wells on-site at the Independence and Lone Pine Landfills will not impact regional supply wells or LADWP production wells.

XXI. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 wild-life population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
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.	☐	☐	☒	☐
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

DISCUSSION

a) **Less Than Significant Impact.** As described in Section IV, *Biological Resources*, the proposed Project is not expected to impact wildlife, fish, or plant resources of the area. Potential impacts to cultural and Tribal cultural resources are discussed above in Section V, *Cultural Resources*. Continued operation of these properties as landfill facilities does have the potential for degradation of the quality of the environment over time, but impacts are considered to be less than significant to biological and historic resources.

b) **Less Than Significant Impact.** The proposed Project is primarily an ownership change, with no significant operational changes proposed which would cause immediate, direct physical impacts beyond the baseline conditions. However, the proposed Project also includes the continued operation of these three sites as landfill facilities for long-term operational periods, plus a pre-defined closure and post-closure period. The reduction of cumulative impacts, to a less-than-significant level, depends on the consistent implementation of mitigation measures and minimization measures over the life of the facilities.

c) **Less Than Significant Impact.** As described in the individual resource area analyses above, with the implementation of mitigation measures identified in the 1999 MNDs, permit conditions, and other best management practices to comply with applicable federal, state, and local regulations,

the proposed acquisition and continued operation of the three existing landfills would not result in environmental effects that would cause substantial adverse effects on human beings.

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TABLES

TABLE 1
Summary of Established and New Mitigation Measures

Category	Original Mitigation Required (1999 MNDs)	New Mitigation Measures Proposed
Aesthetics	None	None
Agriculture and Forestry Resources	None	None
Air Quality	None	None
Biological Resources	None	BIO-1: Nesting Bird Survey and Monitoring
Cultural Resources	None	CUL-1: Tribal Monitoring of Excavation for the Lone Pine Waterline CUL-2: Worker Awareness Training
Energy	N/A	None
Geology/Soils	Landfill slopes and features designed to withstand maximum probably earthquake without significant failure. Slopes designed at 4:1 per slope stabilty analysis, no structures within 25 feet of waste limits. Bishop-Sunland only: No habitable structures will be located on areas where waste has been placed, nor will any structures be placed within 50 feet of the fault zone or waste limits. Site-specific Alquist-Priolo investigation to be conducted. In erosion-prone areas, soil surfaces will be compacted, and a retention basin, detention basin and/or soil berms will be contructed.	None None None
Greenhouse Gas Emissions	N/A	None
Hazards and Hazardous Materials	Use of gate attendants, installation of perimeter fencing, implementation of a load-checking program to avoid disposal of hazardous material. Bishop-Sunland only: Asbestos disposal requirements, dictated by the ICEHD and RWQCB - immediate disposal in an area segregated from the main disposal area, application of soil cover once the material is disposed.	None None
Hydrology/Water Quality	Application and compaction of daily cover to minimize precipitation infiltration, implementation of a load-checking program to detect and remove liquids from the waste stream, and grading of site surfaces to provide proper drainage and eliminate the potential for ponding of surface water. Continued implementation of RWQCB-mandated groundwater monitoring and reporitng period	HYD-1: Water Quality Monitoring and Corrective Action
Land Use/Planning	N/A	None
Mineral Resources	None	None
Noise	Operators of heavy equipment and other employees shall be provided and trained on the propoer use of appropriate noise attenuation safety devices.	None
Population/Housing	N/A	None
Public Services	N/A	None
Recreation	None	None
Transportation	N/A	None
Tribal Resources	N/A	TRI-1: Worker Awareness and Notification Plan TRI-2: Tribal Notification and Monitoring During Excavation
Utilities and Service Systems	N/A	None
Wildfire	N/A	None
Mandatory Findings of Significance	None	None

Notes: N/A = Not Analyzed

TABLE 2
Existing Facility Conditions

	Bishop-Sunland Landfill	Independence Landfill	Lone Pine Landfill
Permitting Component	**Description**	**Description**	**Description**
SWFP Facility ID	14-AA-0005	14-AA-0004	14-AA-0003
Date of Permit	2017	2000	2000
Facility Area	118.53 acres	50.89 (proposed)	60.57 acres
Permitted Disposal Area (Footprint)	75.08 acres	14.92 acres	26.13 acres
Design Capacity (cu yds) (1)	6,016,716	695,679	1,228,988
Waste-in-Place (cu yds) (2)	3,297,653	519,045	690,507
Remaining Airspace (cu yds) (2)	2,719,063	176,634	538,481
Estimated Closure Year (3)	2066	2048	2058
Permitted Maximum Tonnage	160 Tons per Day Total (135 TPD waste disposal, including C&D, 25 TPD re-use/recycling)	10 Tons per Day (permit), to be revised to reflect current waste disposal rates	22 Tons per Day (permit), to be revised to reflect current waste disposal rates
Waste Discharge Requirements	Board Order No. 6-01-34, WDID No. 6B140300002, MRP No. 01-34	Board Order No. 6-95-116, WDID No. 6B140300004, MRP No. 95-116	Board Order No. 6-95-70, WDID No. 6B140300006, MRP No. 95-70
WDR Condition or Monitoring Phase	Corrective Action Program - Landfill Gas Extraction	Detection Monitoring Program	Evaluation Monitoring Program
Other Facility Components	Class III Asbestos Monofill, Class II Septage Ponds, Petroleum-contaminated Soil Landfarm	Waste oil, Periodic HHW Collection (with off-site disposal)	Waste oil, Periodic HHW Collection (with off-site disposal)
LFG monitoring wells	Perimeter wells per Title 27, LFG Extraction Vents	Perimeter wells per Title 27	Perimeter wells per Title 27
Operating Days/hours	7 days per week, 7:30-3:30	2 days per week, 7:30-3:30	5 days per week, 7:30-3:30
Maximum Vehicles-per-day (permitted)	235	50	75

Notes:

1) Design capacities revised in 2010 to reflect accurate waste in place topographic surveys and final grades at closure.

2) Waste in Place, Remaining Airspace, and Estimated Closure Year are calculated through June 30, 2023. Volumes include waste and cover soil at waste-to-soil ratios and operational densities identifed in the Preliminary Closure and Post-Closure Plans and Permit Review Packages (GLA, 2022/2023).

3) Site Estimated Closure Year accounts for organic waste reductions as required by SB1383 and described in the Status Impact Reports (GLA, 2022/2023).

FIGURES

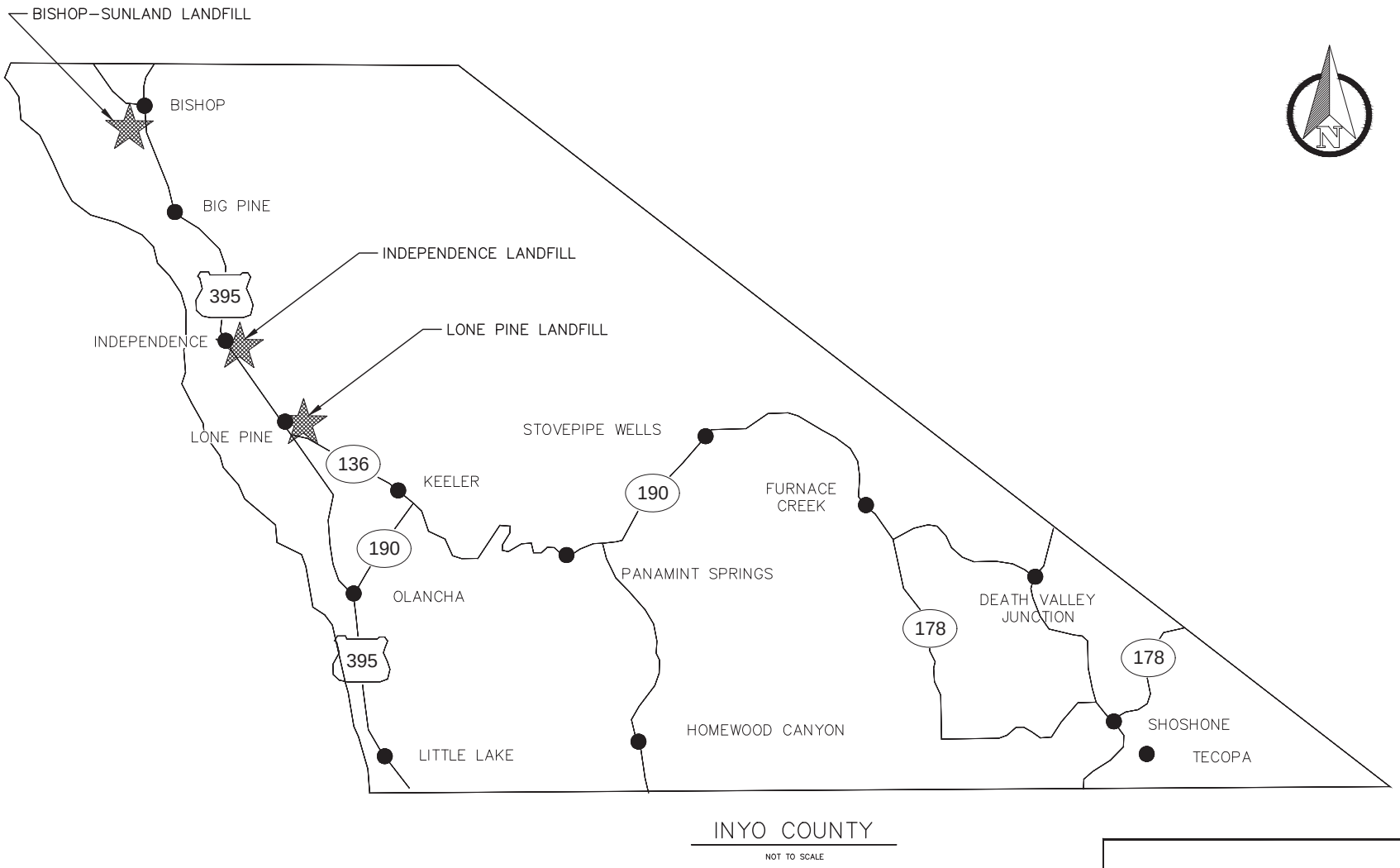

FIGURE 1
SITE LOCATIONS

Inyo County

N:\INYO COUNTY\PROJECT DOCUMENTS\BISHOP-SUNLAND LANDFILL\CAD - GENERAL\EXHIBITS\THREE SITE REGIONAL MAP\FIGURE 1.DWG January 27, 2022 - 4:45 PM BY: GLA USER

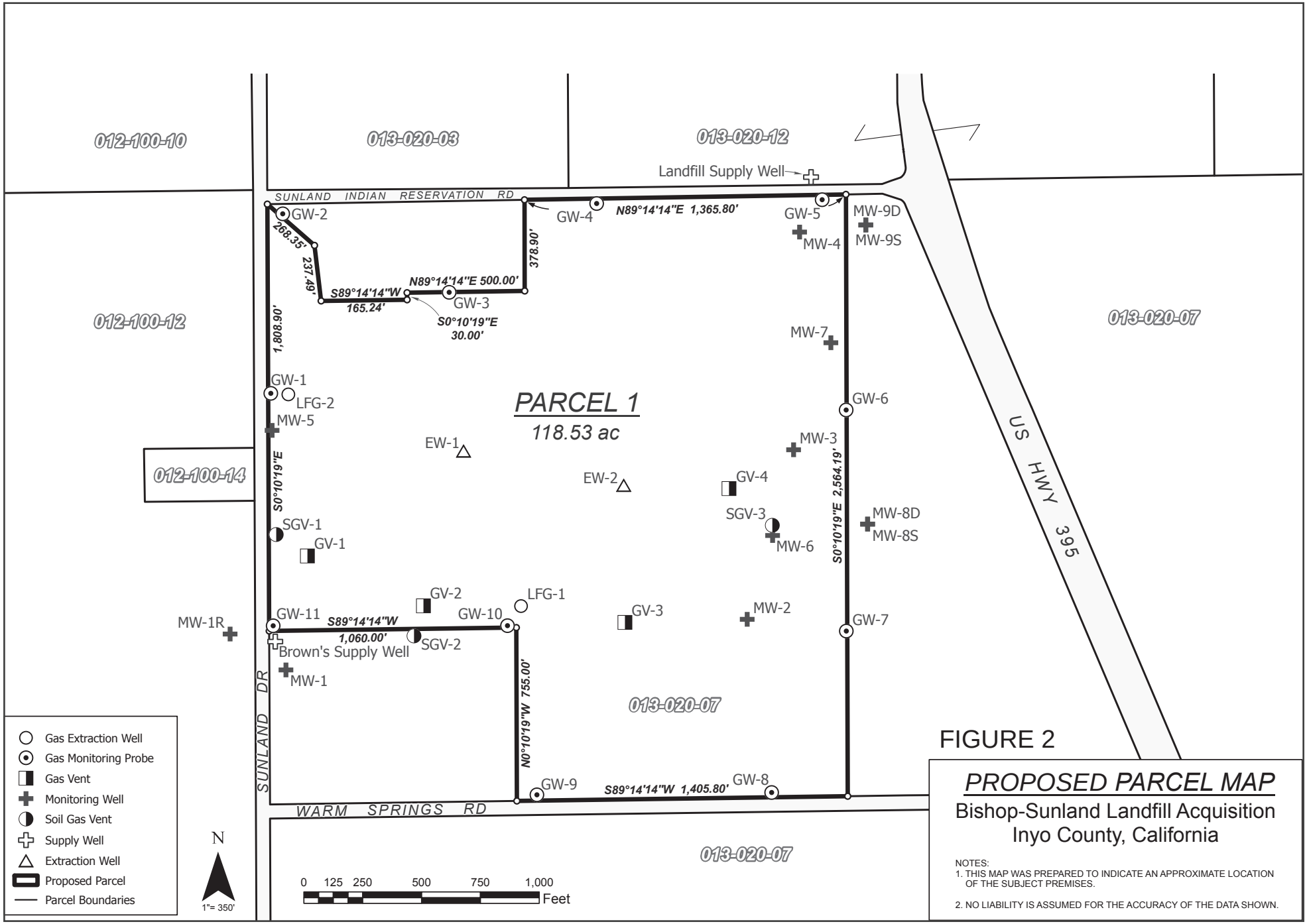

FIGURE 2

PROPOSED PARCEL MAP

Bishop-Sunland Landfill Acquisition
Inyo County, California

NOTES:
1. THIS MAP WAS PREPARED TO INDICATE AN APPROXIMATE LOCATION OF THE SUBJECT PREMISES.

2. NO LIABILITY IS ASSUMED FOR THE ACCURACY OF THE DATA SHOWN.

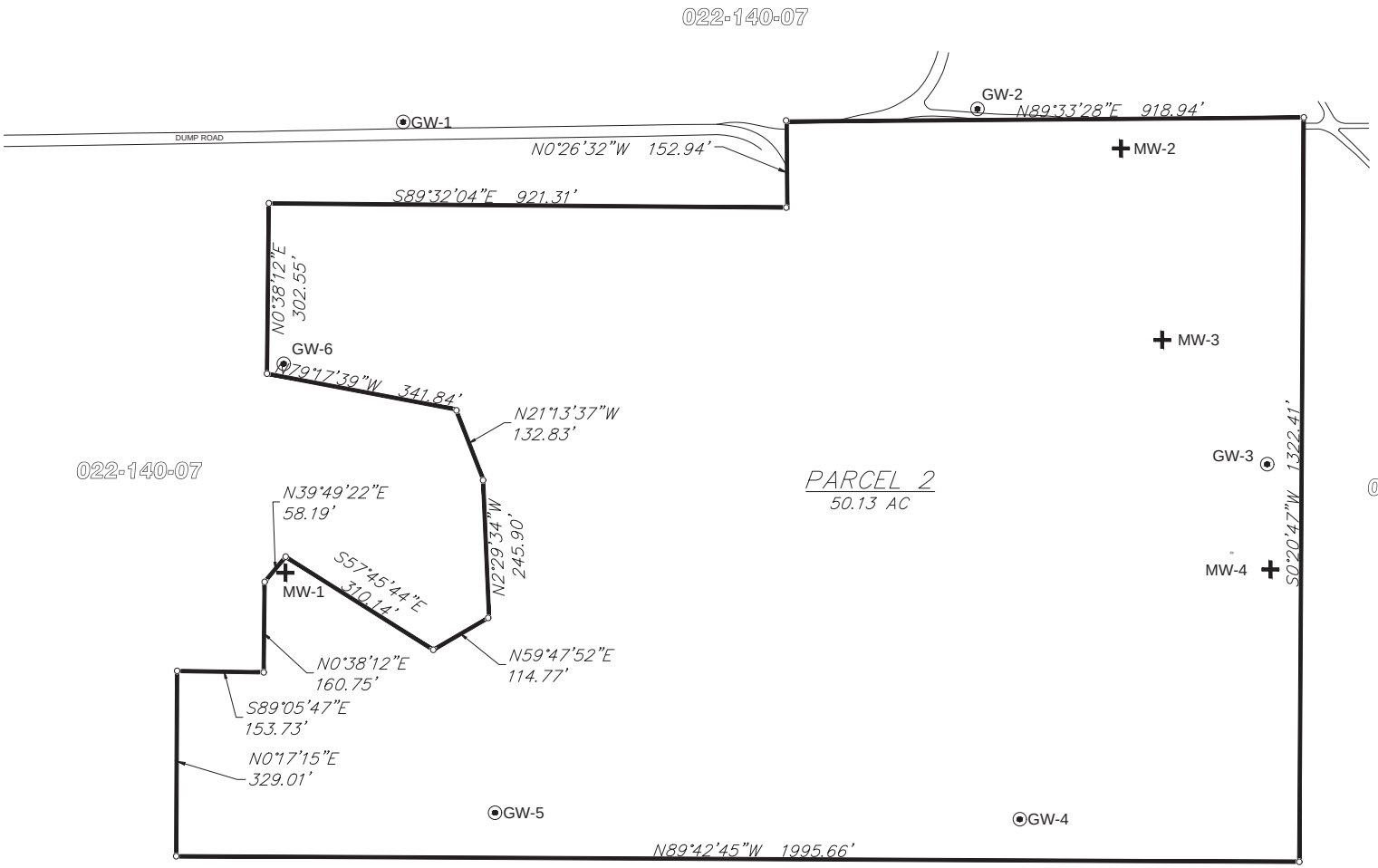

FIGURE 3

INDEPENDENCE LANDFILL ACQUISITION **PROPOSED PARCEL MAP** INYO COUNTY, CALIFORNIA **PROPOSED PARCEL**		**FIGURE NO.** **3** **PROJECT NO.** **AU21.1202.02**
DATE OF ISSUE: 12/11/2023	**DRAWN BY:** RDD	**APPROVED BY:** NC

NOTES:
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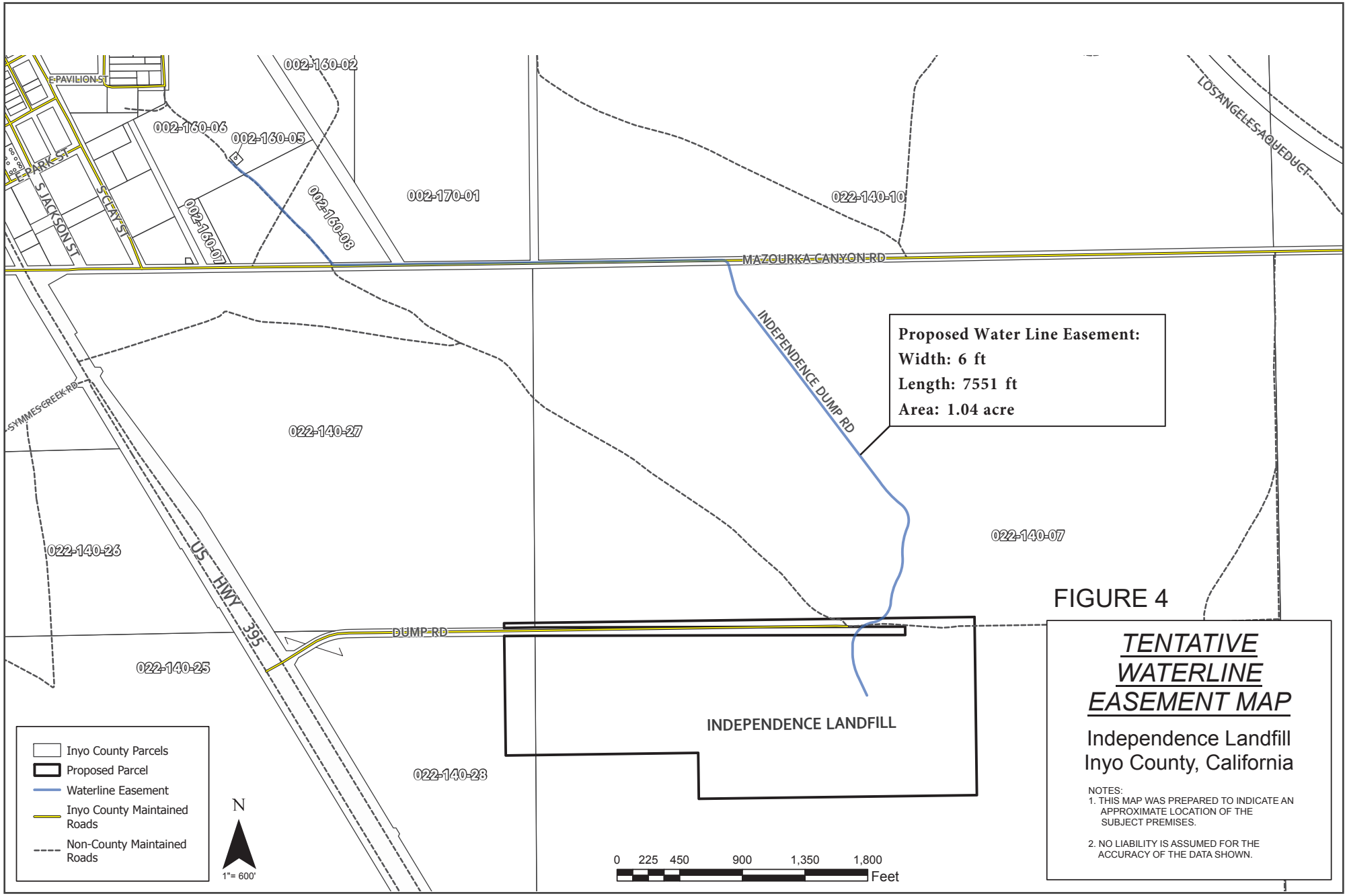

FIGURE 4

TENTATIVE WATERLINE EASEMENT MAP

Independence Landfill
Inyo County, California

NOTES:
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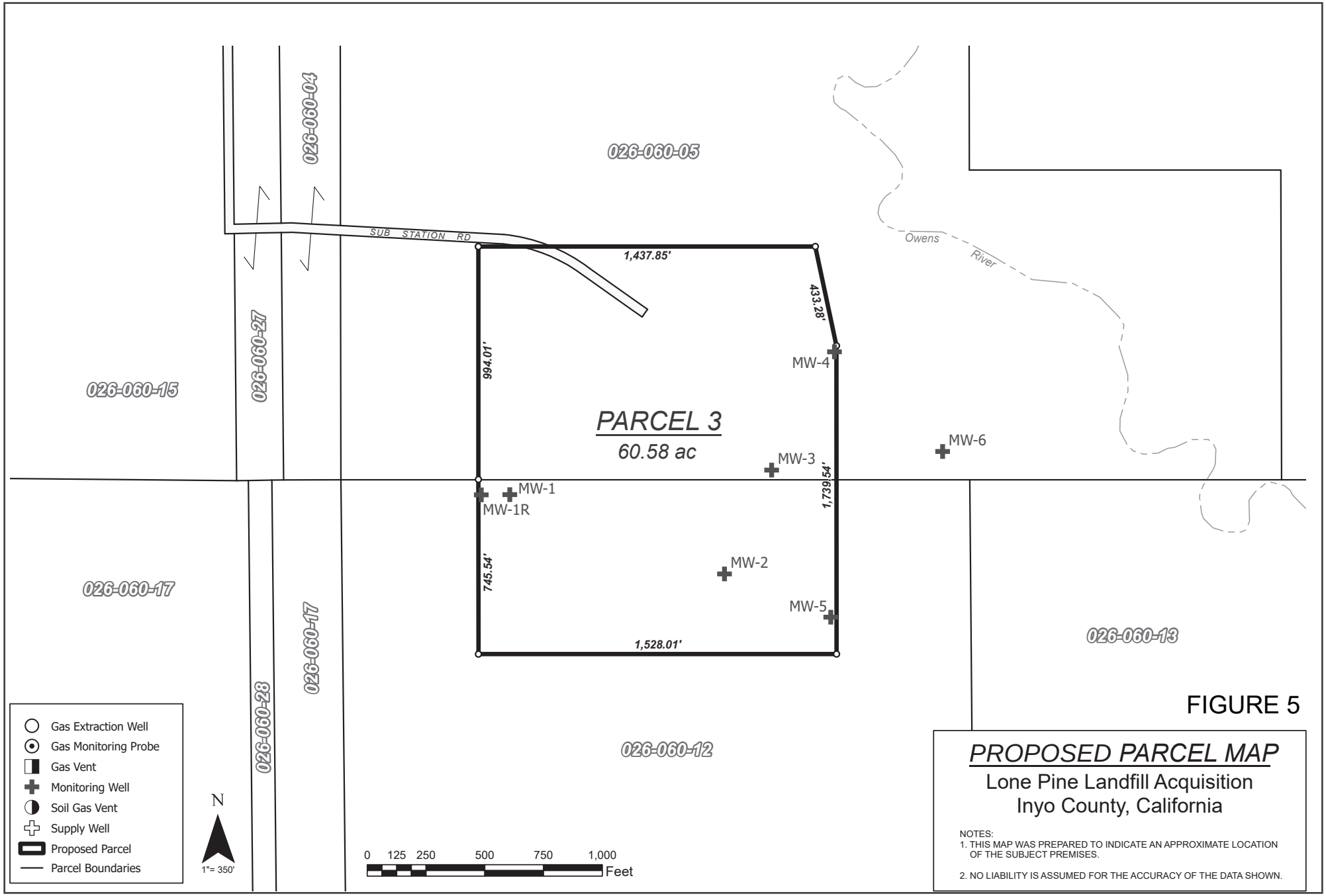


FIGURE 5

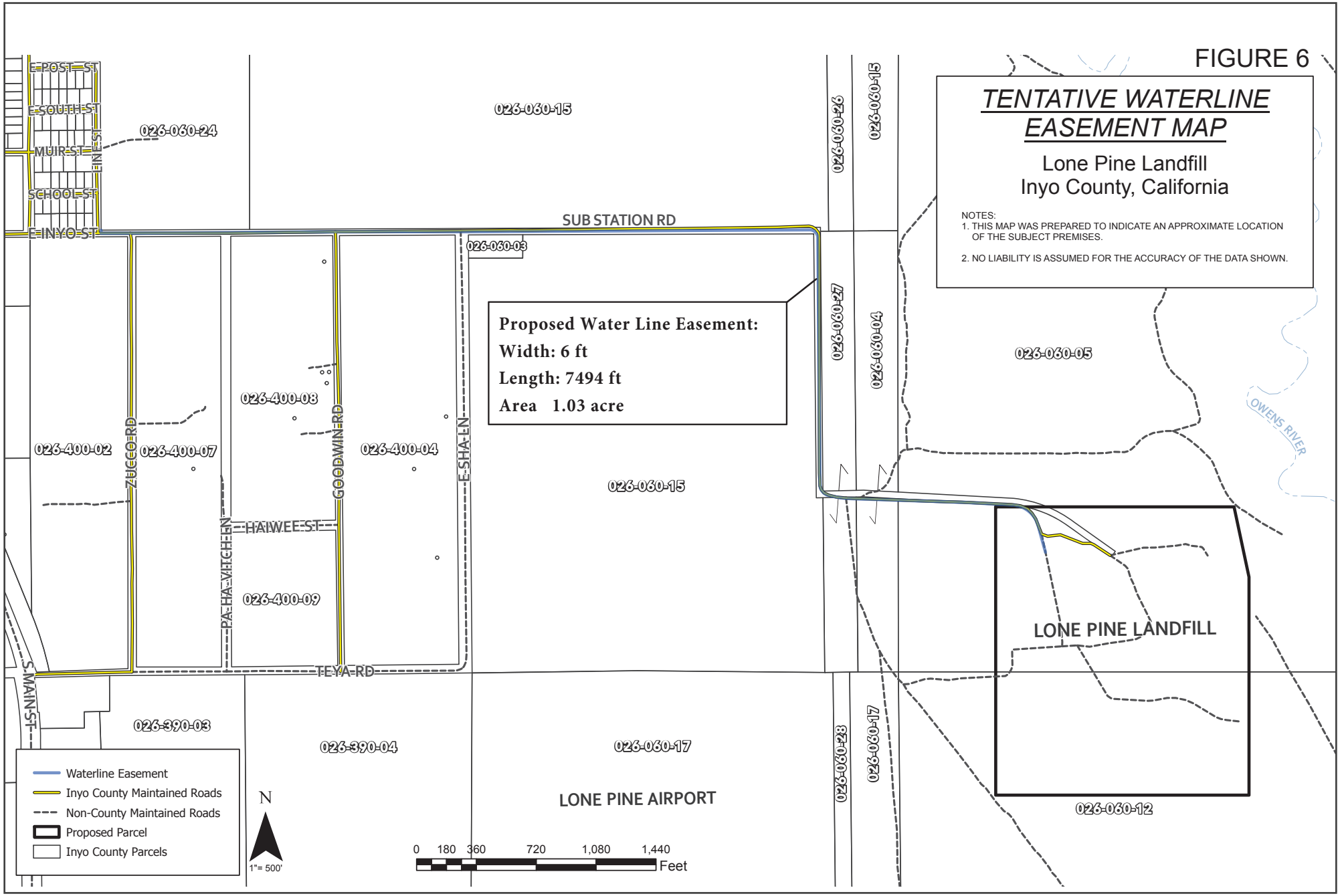
PROPOSED PARCEL MAP

Lone Pine Landfill Acquisition
Inyo County, California

NOTES:
1. THIS MAP WAS PREPARED TO INDICATE AN APPROXIMATE LOCATION OF THE SUBJECT PREMISES.

2. NO LIABILITY IS ASSUMED FOR THE ACCURACY OF THE DATA SHOWN.

FIGURE 6


TENTATIVE WATERLINE EASEMENT MAP
Lone Pine Landfill
Inyo County, California
NOTES:
1. THIS MAP WAS PREPARED TO INDICATE AN APPROXIMATE LOCATION OF THE SUBJECT PREMISES.
2. NO LIABILITY IS ASSUMED FOR THE ACCURACY OF THE DATA SHOWN.
Proposed Water Line Easement:
Width: 6 ft
Length: 7494 ft
Area 1.03 acre
E POST ST
E SOUTH ST
MUIR ST
SCHOOL ST
E INYO ST
N IRA ST
SUB STATION RD
ZUCCO RD
GOODWIN RD
E SHA LN
PA HA VI CHE LN
HAIWEE ST
TE YA RD
S MAIN ST
026-060-24
026-030-15
026-030-03
026-030-26
026-030-27
026-030-07
026-030-05
026-400-02
026-400-07
026-400-03
026-400-04
026-400-09
026-030-15
026-390-03
026-390-04
026-030-17
026-030-23
026-030-12
LONE PINE LANDFILL
LONE PINE AIRPORT
OWENS RIVER
Waterline Easement
Inyo County Maintained Roads
Non-County Maintained Roads
Proposed Parcel
Inyo County Parcels
N
1"= 500'
0 180 360 720 1,080 1,440
Feet

APPENDIX A

EVALUATION OF PUMPING
INYO COUNTY YARD WELL TO
REPLACE THE WATER USED AT BISHOP LANDFILL

LADWP, MAY 2023

Evaluation of Pumping Inyo County Yard Well to Replace the Water Used at Bishop Landfill

Prepared by ESE Group, LADWP

May 2023

Background

The Bishop Landfill (Landfill) is located south of Bishop and covers approximately 120 acres of City-owned land. The land is leased by Inyo County (County) from the City of Los Angeles Department of Water and Power (LADWP). The Landfill uses approximately 7 acre-feet/year (AFY) of groundwater for operational purposes.

The County and LADWP have agreed that the water used at the Landfill will be replaced using a nearby well located in one of the County's yards, approximately two miles north of the Landfill (Figure 1). The water from this well will be delivered via the North Indian Ditch and the Bishop Creek Canal to Owens River. This document evaluates the potential effect on nearby resources from operating the replacement well.

Analysis

The construction specifications of the County well and the results of a pumping test according to a contractor invoice are summarized in Table 1.

Table 1 – Inyo County Well Construction Summary and Capacity

Total Depth (feet below ground surface, ft-bgs)	94
Diameter (inch)	8
Estimated Perforated Interval (ft-bgs)	80 to 94
Pumping Capacity (gpm)	48

Note: The total depth, screen interval, and pumping capacity are approximate values

To replace the 7 AF of groundwater used by Inyo County on the Landfill, assuming a pumping capacity of 48 gpm, the well must continuously operate for 33 days. Analytical and numerical modeling was performed to evaluate this scenario. Aquifer property data used as model inputs are from the USGS Water Supply Paper 2370-H by Wesley Danskin. The County well is located in the shallow aquifer, which has a transmissivity of 16,000 ft^2/day and a storage coefficient of 0.1, as reported in the USGS report.

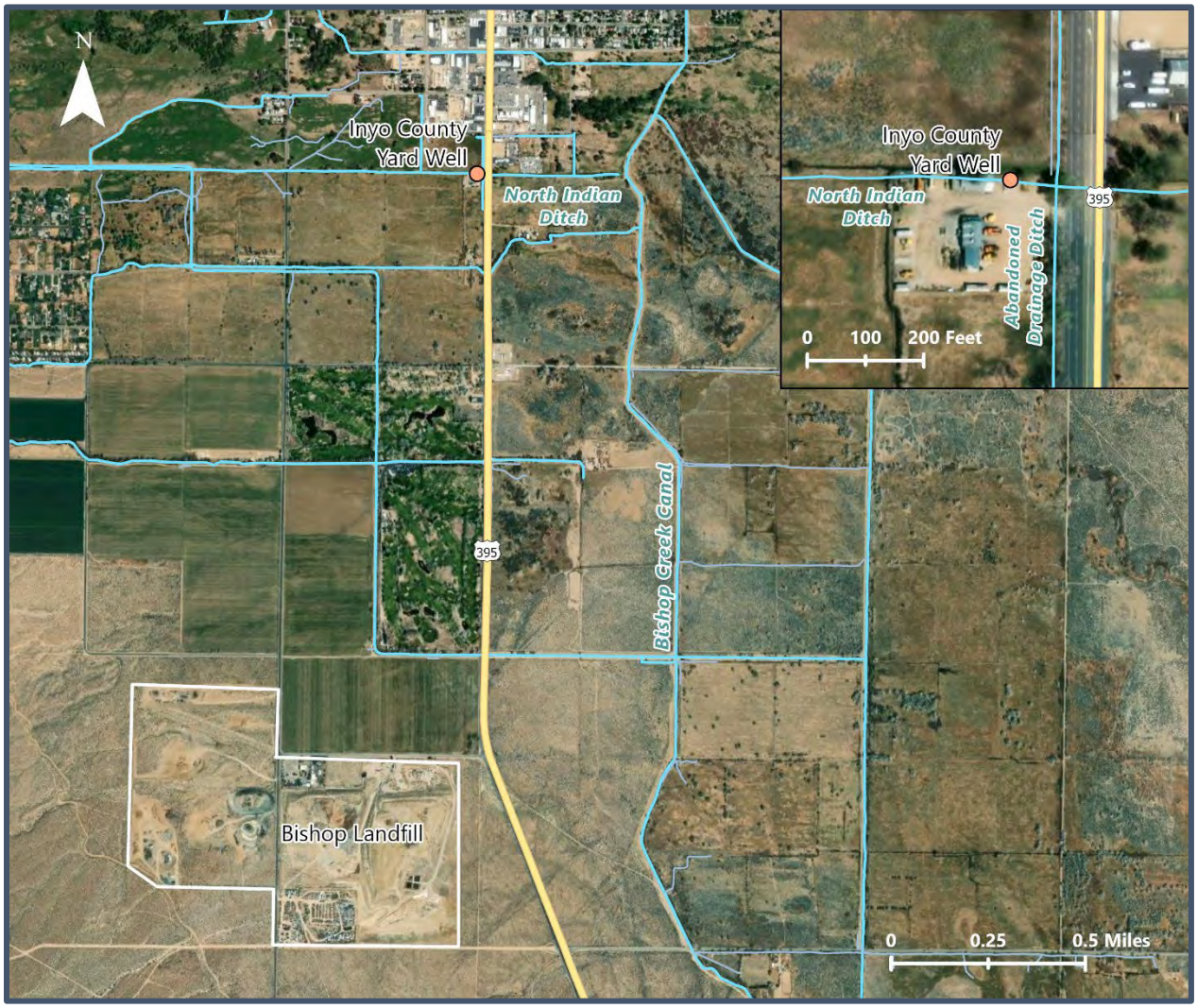


Figure 1 - Map of southern Bishop area with Inyo County yard well and Bishop Landfill labeled

Analytical Model

Given the well depth, homogeneous shallow aquifer, and relatively low pumping capacity, the Theis model is an appropriate tool to estimate the drawdown resulting from pumping this well for 33 days. As shown in the graphs in Figures 2 and 3 below, the total drawdown is approximately 4.5 feet inside the pumping well, 1.8 feet at a 100-foot radius from the well, and 1.3 feet at a 200-foot radius from the well at the end of 33 days of pumping. The drawdown in the shallow aquifer fully recovers in about 37 days.

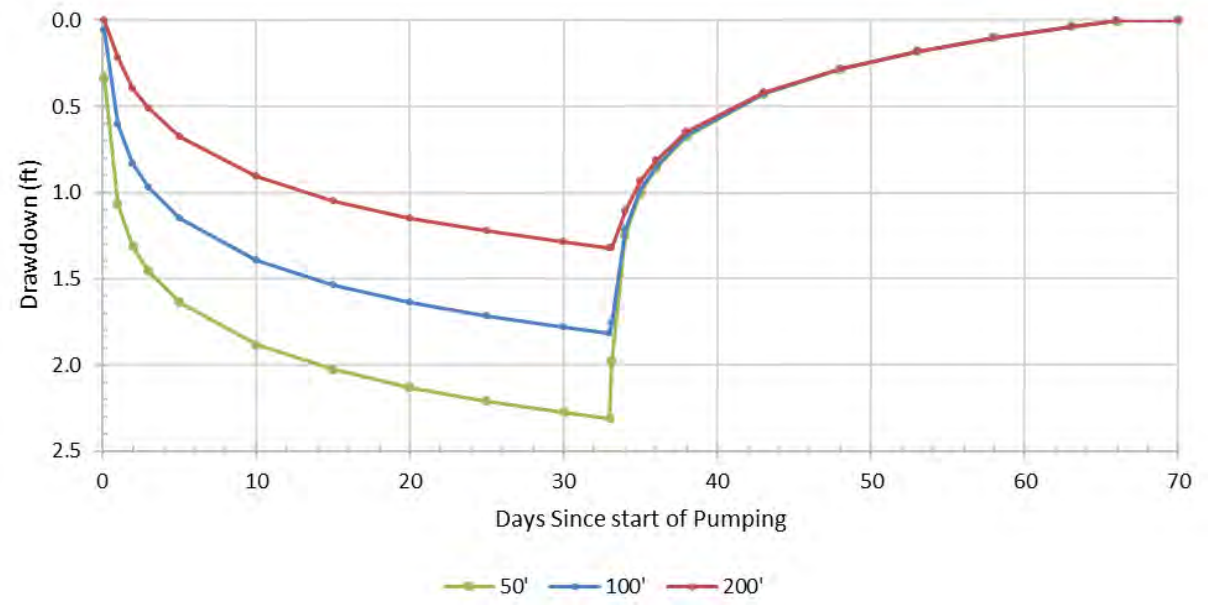


Figure 2 - Estimated drawdown from operating the County well at 48 gpm for 33 days at 50, 100, and 200 feet distance from the well.

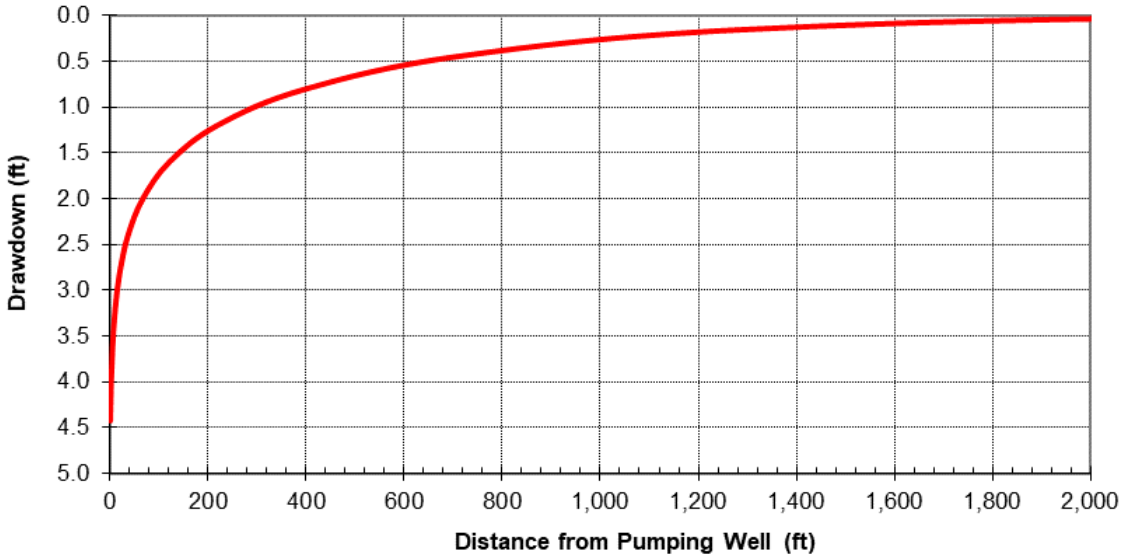


Figure 3 – Graphical representation of the cone of depression from the County well operation

Numerical Model

LADWP has developed a wellfield-specific groundwater flow model based on the USGS's valley-wide MODFLOW model for the Bishop-Laws area, which covers the area where the Landfill and Inyo County maintenance yard well are located. The Bishop-Laws model includes 3 model layers with 500 feet by 500 feet cells. The top model layer is approximately 100 feet thick, representing the shallow aquifer, from which the County well draws water. The 33 days of pumping was simulated using this groundwater flow model. The resulting drawdown contours did not exhibit any drawdown in the vicinity of the County well. This is primarily because of the model cell size and that the estimated nearby North Indian Ditch leakage rate (118 gpm) into the shallow aquifer is more than twice the pumping rate. As such, no graphical contour maps of drawdown in the shallow aquifer are included in this report.

Nearby Non-LADWP Wells and Vegetation

Based on available well completion reports, there are three well nearby, with the closest well located approximately 320 feet northeast of the County well (Figure 4). The well is screened from 65 to 82 feet-bgs. The nearby wells and the County well draw water from the same shallow aquifer, although perforated at different depths.

The vegetation parcels in the vicinity of the County well are either non-groundwater-dependent vegetation Type A or irrigated vegetation Type E, with the nearest Groundwater-dependent vegetation Type B or C parcels being over 800 feet from the County well. No long-term effects on nearby resources are expected according to the results of either model.

Results

The estimated amount of pumping to replace the water used at the Landfill is 7 acre-feet per year. The replacement water from a nearby County well will be pumped at a rate of approximately 48 gpm for a period of 33 days. It is expected that pumping will occur during the summer season. The pumping well will draw water from the shallow aquifer.

Based on the analytical model described above, approximately 1 foot of drawdown in the closest well is expected from pumping after 33 days at this distance. Groundwater levels in the shallow aquifer are expected to recover 37 days after completion of pumping (Figure 2). However, based on the numerical model described above, no drawdown is expected, considering the leakage from the nearby North Indian Ditch into the shallow aquifer.

Results of both the analytical and numerical modeling showed that the low pumping capacity and the short pumping duration will result in minimal shallow groundwater drawdown, which is expected to fully recover in about 37 days after the pumping stops. The closest nearby well to the Inyo County Maintenance Yard well is over 300 feet away. The closed groundwater-dependent vegetation is about 800 feet away from the County well. No significant effects due to pumping are expected in the nearby wells after 33 days and no long-term effects on nearby

resources from pumping the Inyo County well to replace the water used at the Landfill are expected.

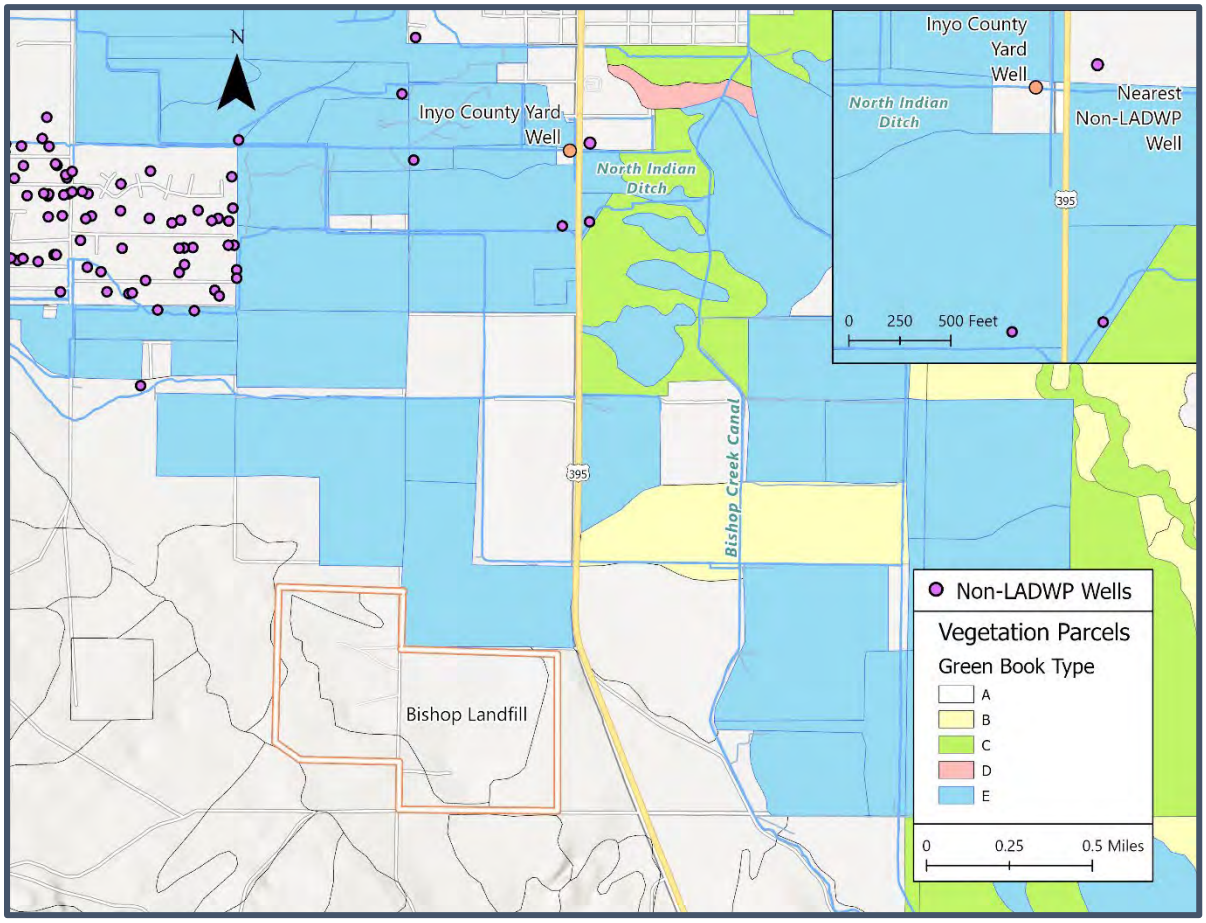


Figure 4 – Map of vegetation parcels and nearby wells in southern Bishop Area

APPENDIX B

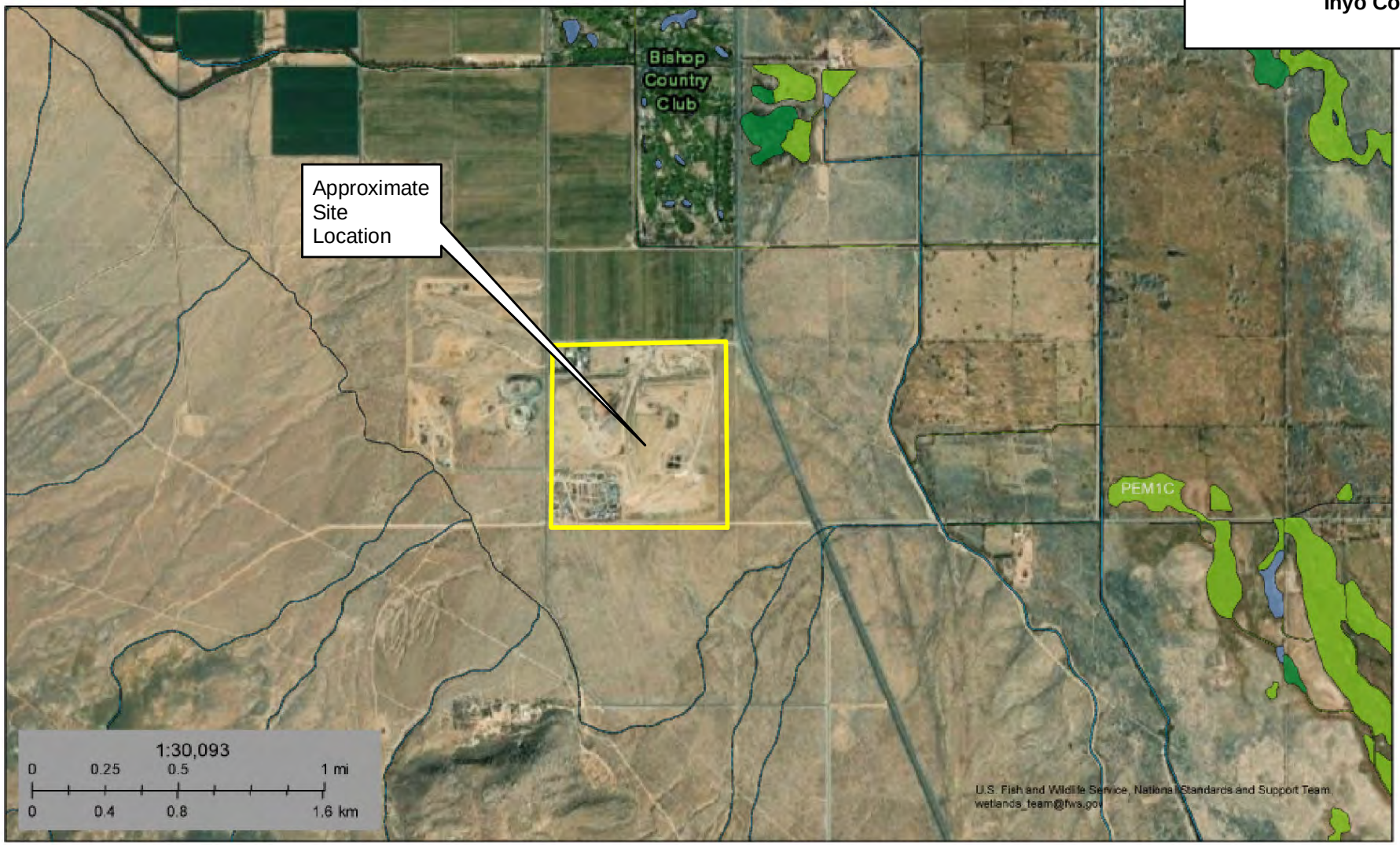
NATIONAL WETLAND INVENTORY MAPS

U.S. Fish and Wildlife Service
National Wetlands Inventory

Bishop-Sunland Landfill

U.S. FISH & WILDLIFE SERVICE
NATIONAL WETLAND INVENTORY MAP

Bishop-Sunland Landfill
Inyo County



June 17, 2022

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

Wetland data based on 1985 color imagery

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

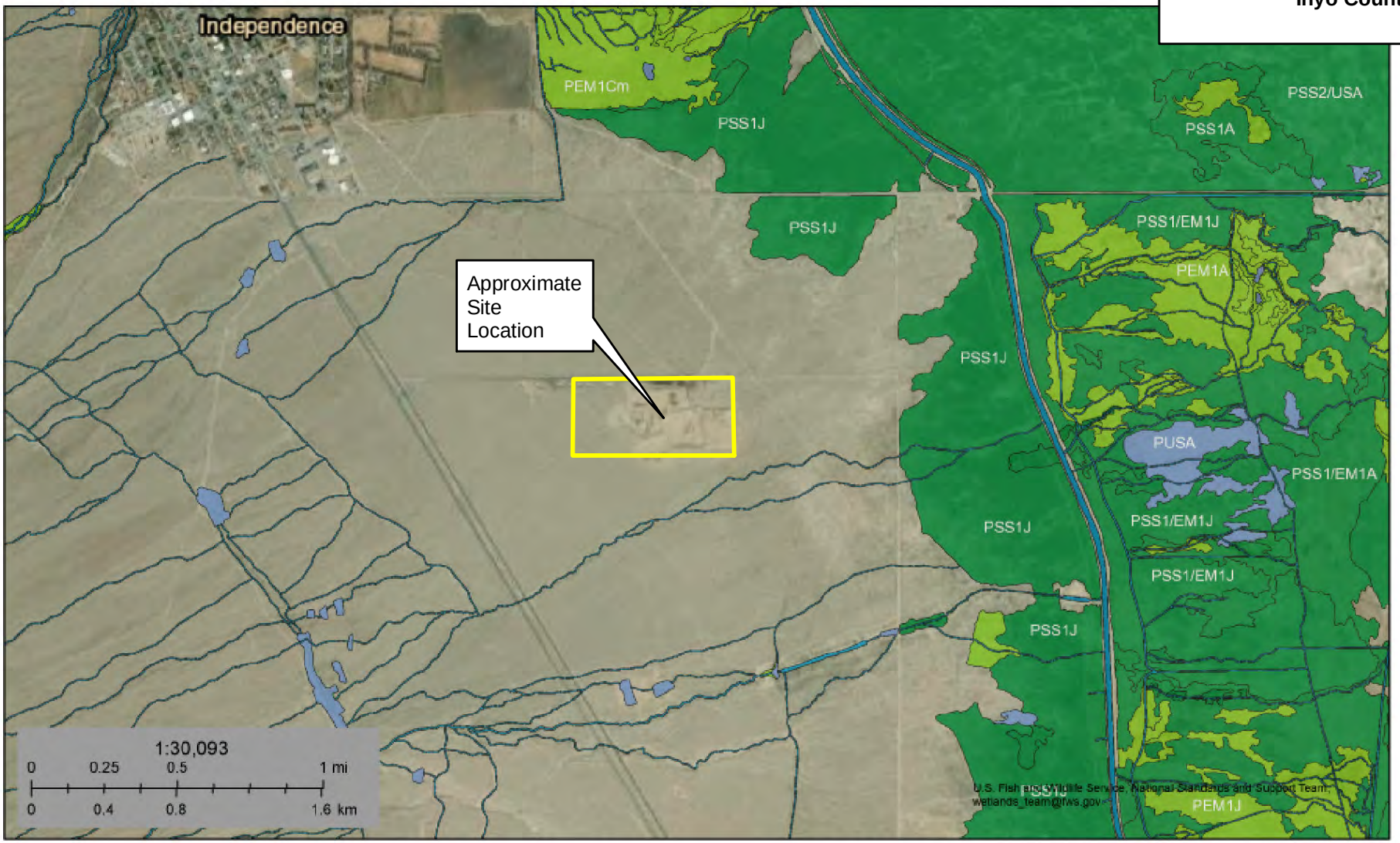
U.S. Fish and Wildlife Service

National Wetlands Inventory

Independence Landfill

U.S. FISH & WILDLIFE SERVICE
NATIONAL WETLAND INVENTORY MAP

Independence Landfill
Inyo County



June 17, 2022

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Wetland data based on 1985 color imagery

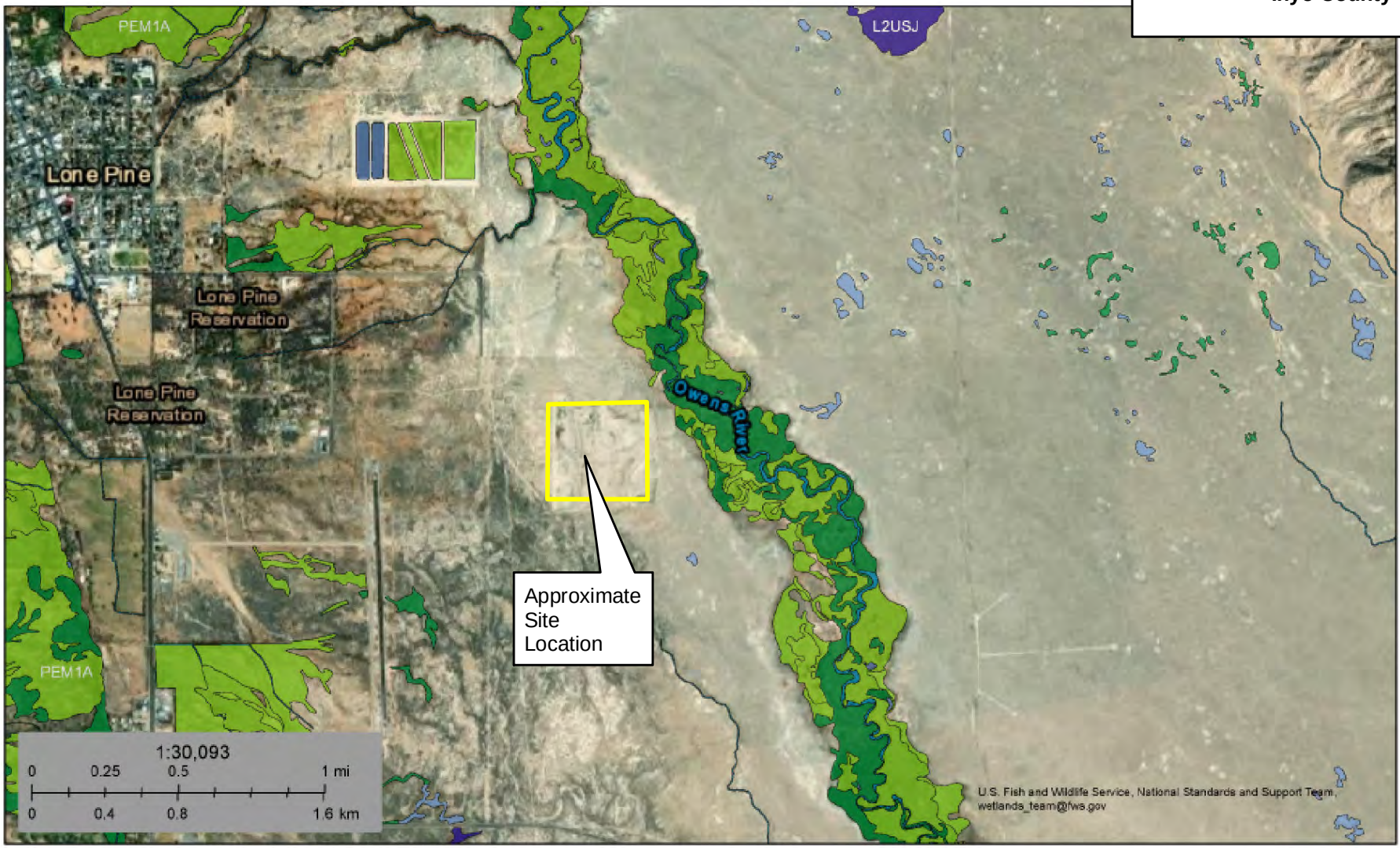
National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

U.S. Fish and Wildlife Service
National Wetlands Inventory

Lone Pine Landfill

U.S. FISH & WILDLIFE SERVICE
NATIONAL WETLAND INVENTORY MAP

Lone Pine Landfill
Inyo County



June 17, 2022

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
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Wetland data based on 1985 color imagery

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

APPENDIX C

CNDDB QUERY TABLES AND MAPS

Table C-1
Listed Species with the Potential to Occur at the Bishop-Sunland Landfill

	Scientific Name	Common Name	Status State	Status Fed	Status Other	General Habitat Description	Potental to occur	Rationale
Invertebrates								
	Bombus morrisoni	Morrison bumble bee			IUCN_VU-Vulnerable	Food plant genera include Cirsium, Cleome, Helianthus, Lupinus, Chrysothamnus, and Melilotus.	Low	Site is mostly bare disturbed ground, food plants not abundant on site
Fishes								
	Catostomus fumeiventris	Owens sucker	SSC			Aquatic, Great Basin flowing waters	None	No wetlands or surface water features at the subject site
	Siphateles bicolor snyderi	Owens tui chub	Endangered	Endangered		Aquatic, Great Basin flowing waters, Great Basin standing waters	None	No wetlands or surface water features at the subject site
	Rhinichthys osculus ssp. 2	Owens speckled dace	SSC			Aquatic, Great Basin flowing waters	None	No wetlands or surface water features at the subject site
Amphibians								
	Lithobates pipiens	northern leopard frog	SSC			Freshwater marsh | Great Basin flowing waters | Great Basin standing waters | Marsh & swamp | Wetland	None	No preferred habitat on site
Mammals								
	Corynorhinus townsendii	Townsend's big-eared bat		SSC		Chenopod scrub, Great Basin grassland, Great Basin scrub, Joshua tree woodland, Meadow & seep, Mojavean desert scrub, Riparian forest, Riparian woodland	Low	Potential foraging habitat on and around site. Natural roosting habitat absent on site
	Euderma maculatum	spotted bat		SSC		Occupies a wide variety of habitats from arid deserts and grasslands through mixed conifer forests.	Low	Potential foraging habitat on and around site. Natural roosting habitat absent on site
	Lasionycteris noctivagans	silver-haired bat				Primarily a coastal and montane forest dweller, feeding over streams, ponds and open brushy areas.	Low	No preferred habitat on site
	Lepus townsendii townsendii	western white-tailed jackrabbit		SSC		Sagebrush, subalpine conifer, juniper, alpine dwarf shrub and perennial grassland.	Unlikley	No preferred habitat on site
	Vulpes vulpes necator pop. 2	Sierra Nevada red fox - Sierra Nevada DPS	Endangered	Threatened		Use multiple habitat types in the alpine and subalpine zones including high-elevation conifer dominated by whitebark pine, mountain hemlock and lodgepole pine, as well as meadows and fell-fields; typically in areas of heavy snow cover.	Unlikley	Outside of Known Range, No preferred habitat on site
Plants								
	Boechera dispar	pinyon rockcress			2B.3			
	Calochortus excavatus	Inyo County star-tulip			1B.1	Chenopod scrub, Meadow & seep, Wetland	Low	Potential habitat along waterline route
	Crepis runcinata	fiddleleaf hawksbeard			2B.2	Mojavean desert scrub, pinyon and juniper woodland.	Low	Potential habitat along waterline route
	Fimbristylis thermalis	hot springs fimbristylis			2B.2	Meadows and seeps (alkaline).	Low	No preferred habitat on site
	Plagiobothrys parishii	Parish's popcornflower			1B.1	Great Basin scrub, Joshua tree woodland	Low	Potential habitat along waterline route
	Ranunculus hydrocharoides	frog's-bit buttercup			2B.1	Marshes and swamps.	None	Potential habitat along waterline route
	Sidalcea covillei	Owens Valley checkerbloom		Endangered	1B.1	Chenopod scrub, Meadow & seep, Wetland	Low	Potential habitat along waterline route
Sensitive Natural Communities								
	Alkali Meadow	Alkali Meadow				Meadow & seep | Wetland	Low	Potential Alkali Meadow habitat along waterline route

Note: The list of special-status species with the potential to occur was determined using the California Natural Diversity Database (CNDDB). Search based on USGS Independence 15-minute quadrangle map.

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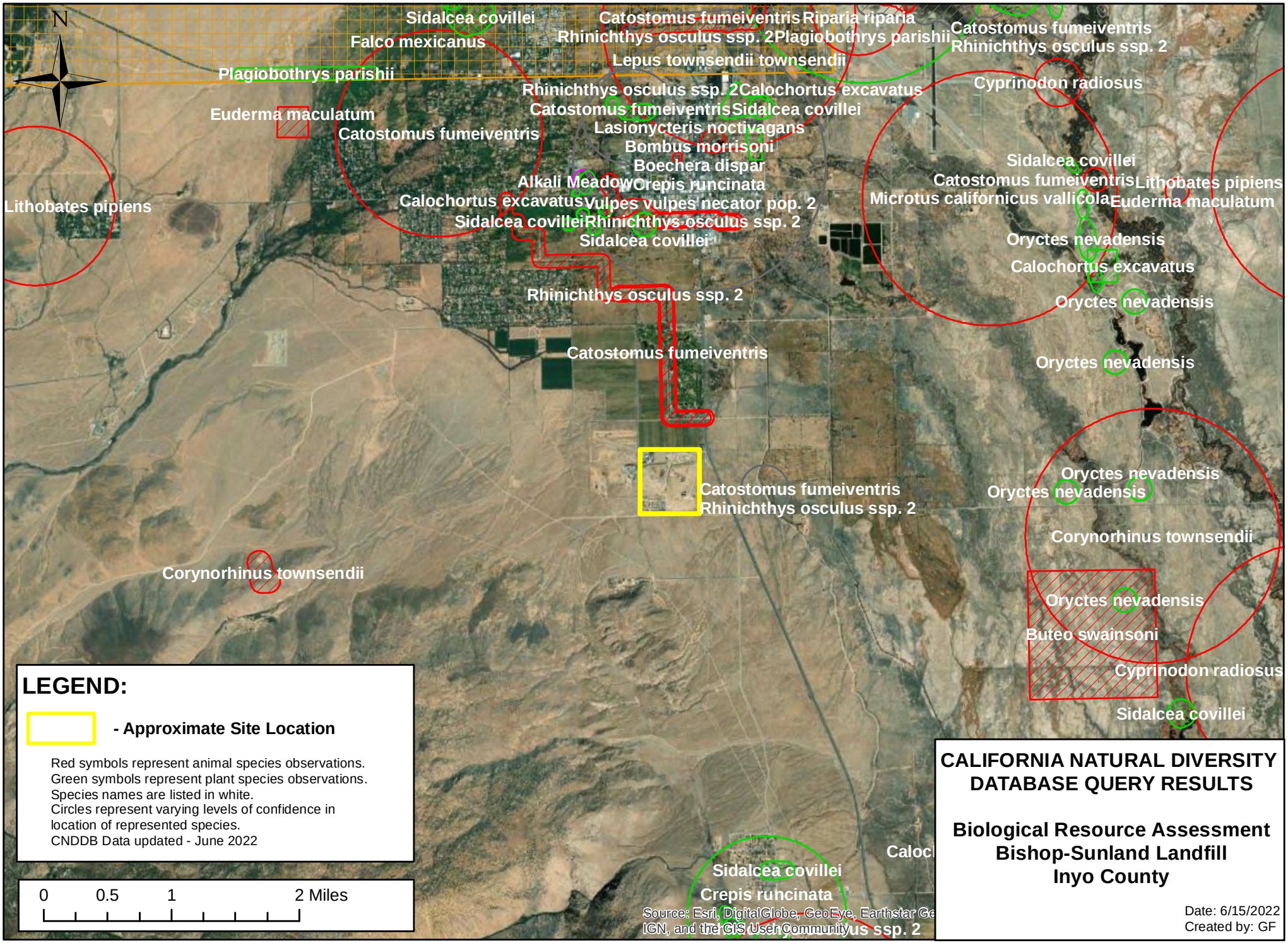
N
Sidalcea covillei
Falco mexicanus
Plagiobothrys parishii
Euderma maculatum
Catostomus fumeiventris
Lithobates pipiens
Catostomus fumeiventris Riparia riparia
Rhinichthys osculus ssp. 2 Plagiobothrys parishii
Lepus townsendii townsendii
Rhinichthys osculus ssp. 2 Calochortus excavatus
Catostomus fumeiventris Sidalcea covillei
Lasionycteris noctivagans
Bombus morrisoni
Boechera dispar
Alkali Meadow Crepis runcinata
Calochortus excavatus Vulpes vulpes necator pop. 2
Sidalcea covillei Rhinichthys osculus ssp. 2
Sidalcea covillei
Rhinichthys osculus ssp. 2
Catostomus fumeiventris
Catostomus fumeiventris
Rhinichthys osculus ssp. 2
Corynorhinus townsendii
Sidalcea covillei
Crepis runcinata
Caloch
us ssp. 2
Catostomus fumeiventris
Rhinichthys osculus ssp. 2
Cyprinodon radiosus
Sidalcea covillei
Catostomus fumeiventris Lithobates pipiens
Microtus californicus vallicola Euderma maculatum
Oryctes nevadensis
Calochortus excavatus
Oryctes nevadensis
Oryctes nevadensis
Oryctes nevadensis
Corynorhinus townsendii
Oryctes nevadensis
Buteo swainsoni
Cyprinodon radiosus
Sidalcea covillei
LEGEND:
- Approximate Site Location
Red symbols represent animal species observations.
Green symbols represent plant species observations.
Species names are listed in white.
Circles represent varying levels of confidence in location of represented species.
CNDDB Data updated - June 2022
0 0.5 1 2 Miles
Source: Esri, DigitalGlobe, GeoEye, Earthstar Ge
IGN, and the GIS User Community
CALIFORNIA NATURAL DIVERSITY DATABASE QUERY RESULTS
Biological Resource Assessment
Bishop-Sunland Landfill
Inyo County
Date: 6/15/2022
Created by: GF

Table C-2
Listed Species with the Potential to Occur at the Independence Landfill

	Scientific Name	Common Name	Status State	Status Fed	Status Other	General Habitat Description	Potental to occur	Rationale
Invertebrates								
	Bombus morrisoni	Morrison bumble bee			IUCN_VU-Vulnerable	Food plant genera include Cirsium, Cleome, Helianthus, Lupinus, Chrysothamnus, and Melilotus.	Low	Site is mostly bare disturbed ground, food plants not abundant on site
Fishes								
	Cyprinodon radiosus	Owens pupfish	Endangered	Endangered		Aquatic, Great Basin flowing waters, Great Basin standing waters	None	No wetlands or surface water features at the subject site
	Siphateles bicolor snyderi	Owens tui chub	Endangered	Endangered		Aquatic, Great Basin flowing waters, Great Basin standing waters	None	No wetlands or surface water features at the subject site
Amphibians								
	Hydromantes platycephalus	Mount Lyell salamander	Watch List			Massive rock areas in mixed conifer, red fir, lodgepole pine, and subalpine habitats, 4000 to 11,600 feet in elevation.	None	No preferred habitat on site
Birds								
	Buteo swainsoni	Swainson's hawk		Threatened		Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees.	Low	Potential foraging habitat on and around site. Nesting habitat absent on site
	Coccyzus americanus occidentalis	western yellow-billed cuckoo	Threatened	Endangered		Riparian forest nester, along the broad, lower flood-bottoms of larger river systems.	Low	No preferred habitat on site
	Empidonax traillii extimus	southwestern willow flycatcher	Endangered	Endangered		Riparian woodland	Low	No preferred habitat on site
	Icteria virens	yellow-breasted chat	SSC			Summer resident; inhabits riparian thickets of willow and other brushy tangles near watercourses.	Low	No preferred habitat on site
	Ixobrychus exilis	least bittern	SSC			Colonial nester in marshlands and borders of ponds and reservoirs which provide ample cover.	Low	No preferred habitat on site
Mammals								
	Antrozous pallidus	pallid bat		SSC		Chaparral, Desert wash, Great Basin grassland, Great Basin scrub, Mojavean desert scrub	Low	Potential foraging habitat on and around site. Natural roosting habitat absent on site
	Corynorhinus townsendii	Townsend's big-eared bat		SSC		Chenopod scrub, Great Basin grassland, Great Basin scrub, Joshua tree woodland, Meadow & seep, Mojavean desert scrub, Riparian forest, Riparian woodland	Low	Potential foraging habitat on and around site. Natural roosting habitat absent on site
	Microtus californicus vallicola	Owens Valley vole		SSC		Meadow & seep, Wetland	None	There are no wetlands or surface water features at the site
Plants								
	Aliciella triodon	coyote gilia			2B.2	Great Basin scrub, pinyon and juniper woodland.	Possible	Potential habitat on site, however no undisturbed habitat on site
	Calochortus excavatus	Inyo County star-tulip			1B.1	Chenopod scrub, Meadow & seep, Wetland	Low	There are no wetlands or surface water features at the subject site
	Eremothera boothii ssp. boothii	Booth's evening-primrose			2B.3	Joshua tree woodland, pinyon and juniper woodland.	Low	No preferred habitat on site
	Eremothera boothii ssp. intermedia	Booth's hairy evening-primrose			2B.3	Great Basin scrub, pinyon and juniper woodland.	Possible	Potential habitat on site, however no undisturbed habitat on site
	Mentzelia torreyi	Torrey's blazing star			2B.2	Great Basin scrub, Mojavean desert scrub, pinyon and juniper woodland.	Possible	Potential habitat on site, however no undisturbed habitat on site
	Orobanche ludoviciana var. arenosa	Suksdorf's broom-rape			2B.3	Great Basin scrub.	Possible	Potential habitat on site, however no undisturbed habitat on site
	Plagiobothrys parishii	Parish's popcornflower			1B.1	Great Basin scrub, Joshua tree woodland	Low	No preferred habitat on site
	Sidalcea covillei	Owens Valley checkerbloom		Endangered	1B.1	Chenopod scrub, Meadow & seep, Wetland	Low	No preferred habitat on site
Sensitive Natural Communities								
	Water Birch Riparian Scrub	Water Birch Riparian Scrub				Riparian scrub	None	There are no wetlands or surface water features at the subject site

Note: The list of special-status species with the potential to occur was determined using the California Natural Diversity Database (CNDDB). Search based on USGS Independence 15-minute quadrangle map.

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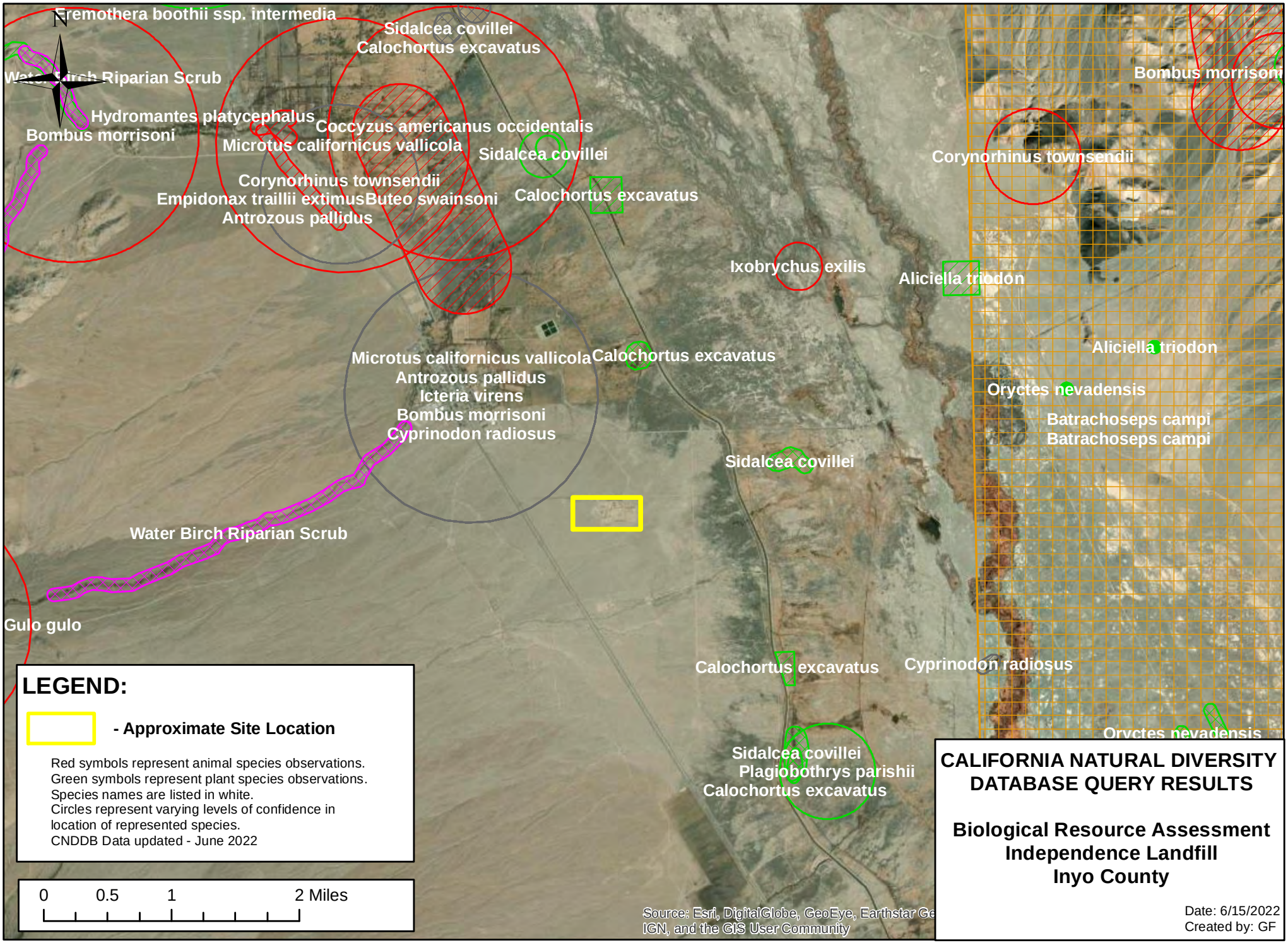
Eremothera boothii ssp. intermedia
Sidalcea covillei
Calochortus excavatus
Water Birch Riparian Scrub
Hydromantes platycephalus
Bombus morrisoni
Coccyzus americanus occidentalis
Microtus californicus vallicola
Sidalcea covillei
Corynorhinus townsendii
Empidonax traillii extimus
Buteo swainsoni
Antrozous pallidus
Calochortus excavatus
Ixobrychus exilis
Aliciella triodon
Bombus morrisoni
Corynorhinus townsendii
Aliciella triodon
Microtus californicus vallicola
Calochortus excavatus
Antrozous pallidus
Icteria virens
Bombus morrisoni
Cyprinodon radiosus
Oryctes nevadensis
Batrachoseps campi
Batrachoseps campi
Sidalcea covillei
Water Birch Riparian Scrub
Gulo gulo
Calochortus excavatus
Cyprinodon radiosus
Oryctes nevadensis
Sidalcea covillei
Plagiobothrys parishii
Calochortus excavatus
N
LEGEND:
- Approximate Site Location
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CNDDB Data updated - June 2022
0 0.5 1 2 Miles
Source: Esri, DigitalGlobe, GeoEye, Earthstar Ge
IGN, and the GIS User Community
CALIFORNIA NATURAL DIVERSITY
DATABASE QUERY RESULTS
Biological Resource Assessment
Independence Landfill
Inyo County
Date: 6/15/2022
Created by: GF

Table C-3
Listed Species with the Potential to Occur at the Lone Pine Landfill

	Scientific Name	Common Name	Status State	Status Fed	Status Other	General Habitat Description	Potental to occur	Rationale
Invertebrates								
	Bombus morrisoni	Morrison bumble bee			IUCN_VU-Vulnerable	Food plant genera include Cirsium, Cleome, Helianthus, Lupinus, Chrysothamnus, and Melilotus.	Low	Site is mostly bare disturbed ground, food plants not abundant on site
	Pyrgulopsis wongi	Wong's springsnail			USFS_S-Sensitive	Great Basin flowing waters, Meadow & seep	None	No wetlands or surface water features at the subject site
Fishes								
	Cyprinodon radiosus	Owens pupfish	Endangered	Endangered		Aquatic, Great Basin flowing waters, Great Basin standing waters	None	No wetlands or surface water features at the subject site
	Siphateles bicolor snyderi	Owens tui chub	Endangered	Endangered		Aquatic, Great Basin flowing waters, Great Basin standing waters	None	No wetlands or surface water features at the subject site
Amphibians								
	Rana sierrae	Sierra Nevada yellow-legged frog	Endangered	Threatened		Aquatic, Great Basin flowing waters, Great Basin standing waters	None	No preferred habitat on site
Reptiles								
	Gopherus agassizii	desert tortoise	Threatened	Threatened		Joshua tree woodland, Mojavean desert scrub, Sonoran desert scrub	Low	Potential Habitat exists on site, perimeter fence should be sufficient to exclude from site
Birds								
	Charadrius montanus	mountain plover		SSC		Chenopod scrub, Valley & foothill grassland	Low	Preferred habitat marginal on site
	Charadrius nivosus nivosus	western snowy plover		Threatened		Great Basin standing waters, Sand shore, Wetland	Low	No preferred habitat on site
	Vireo bellii pusillus	least Bell's vireo	Endangered	Endangered		Riparian forest, Riparian scrub, Riparian woodland	Low	No preferred habitat on site
Mammals								
	Antrozous pallidus	pallid bat		SSC		Chaparral, Desert wash, Great Basin grassland, Great Basin scrub, Mojavean desert scrub |	Low	Potential foraging habitat on and around site. Natural roosting habitat absent on site
	Corynorhinus townsendii	Townsend's big-eared bat		SSC		Chenopod scrub, Great Basin grassland, Great Basin scrub, Joshua tree woodland, Meadow & seep, Mojavean desert scrub, Riparian forest, Riparian woodland	Low	Potential foraging habitat on and around site. Natural roosting habitat absent on site
	Euderma maculatum	spotted bat		SSC		Occupies a wide variety of habitats from arid deserts and grasslands through mixed conifer forests.	Low	Potential foraging habitat on and around site. Natural roosting habitat absent on site
	Microtus californicus vallicola	Owens Valley vole		SSC		Meadow & seep, Wetland	None	Potential habitat along waterline route
	Ovis canadensis sierrae	Sierra Nevada bighorn sheep	Endangered	Endangered		Alpine, Alpine dwarf scrub, Chaparral,Chenopod scrub, Great Basin scrub	Low	No preferred habitat on site
Plants								
	Astragalus hornii var. hornii	Horn's milk-vetch			1B.1	Alkali playa, Meadow & seep, Wetland	Low	Potential habitat along waterline route
	Calochortus excavatus	Inyo County star-tulip			1B.1	Chenopod scrub, Meadow & seep, Wetland	Low	Potential habitat along waterline route
	Oryctes nevadensis	Nevada oryctes			2B.1	Chenopod scrub, Desert wash, Mojavean desert scrub	Possible	Potential Habitat exists on site
	Phacelia inyoensis	Inyo phacelia			1B.2	Meadow & seep	Low	Potential habitat along waterline route
	Plagiobothrys parishii	Parish's popcornflower			1B.1	Great Basin scrub, Joshua tree woodland	Low	Potential habitat along waterline route
	Sidalcea covillei	Owens Valley checkerbloom		Endangered	1B.1	Chenopod scrub, Meadow & seep, Wetland	Low	Potential habitat along waterline route
Sensitive Natural Communities								
	Alkali Seep	Alkali Seep				Meadow & seep, Wetland	None	Potential habitat along waterline route

Note: The list of special-status species with the potential to occur was determined using the California Natural Diversity Database (CNDDB). Search based on Lone Pine 15-minute quadrangle map.

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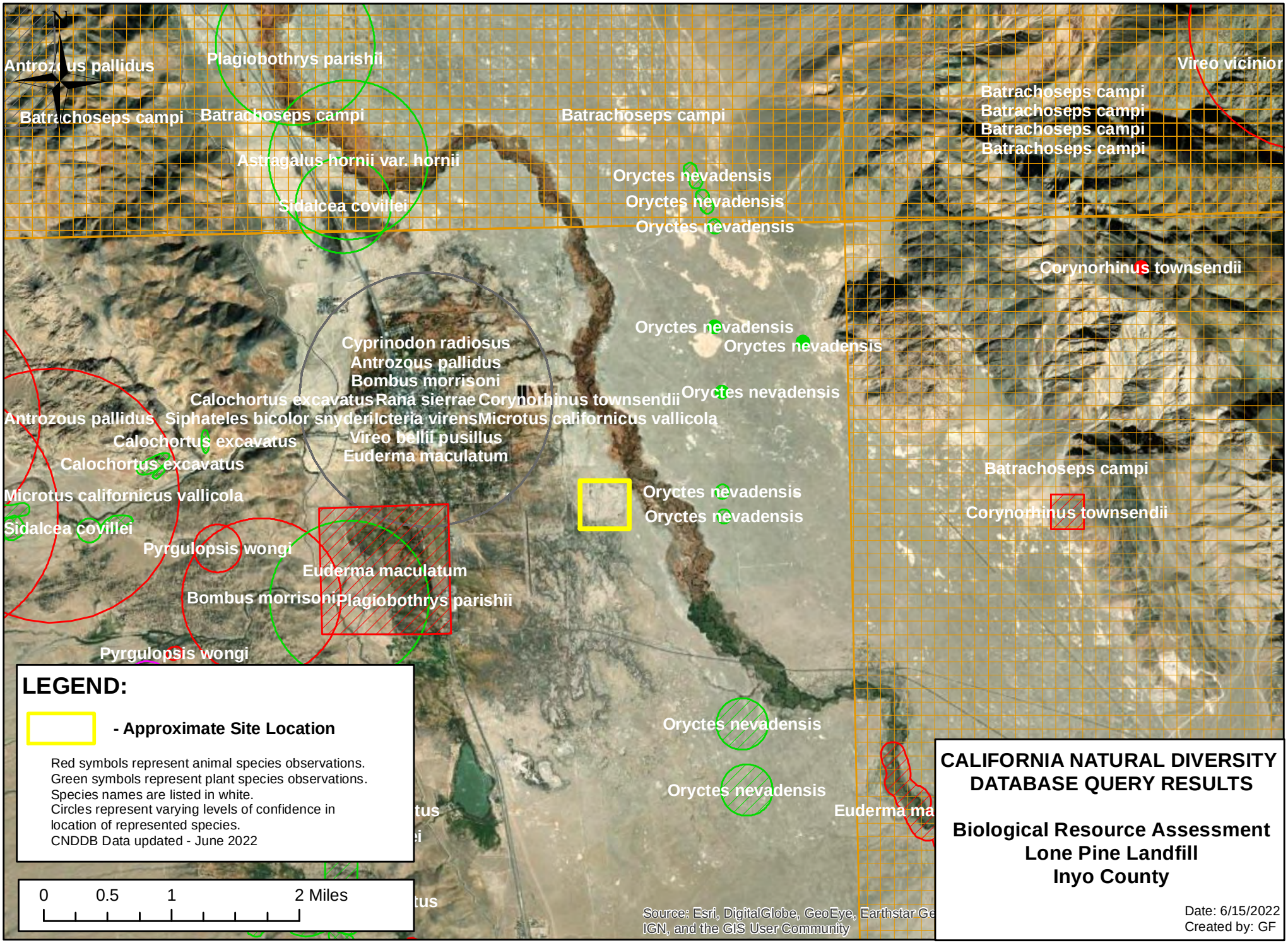
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Vireo vicinior
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Corynorhinus townsendii
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Euderma maculatum
Bombus morrisoni
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Pyrgulopsis wongi
Oryctes nevadensis
Oryctes nevadensis
Euderma ma
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CNDDB Data updated - June 2022
0
0.5
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2 Miles
Source: Esri, DigitalGlobe, GeoEye, Earthstar Ge
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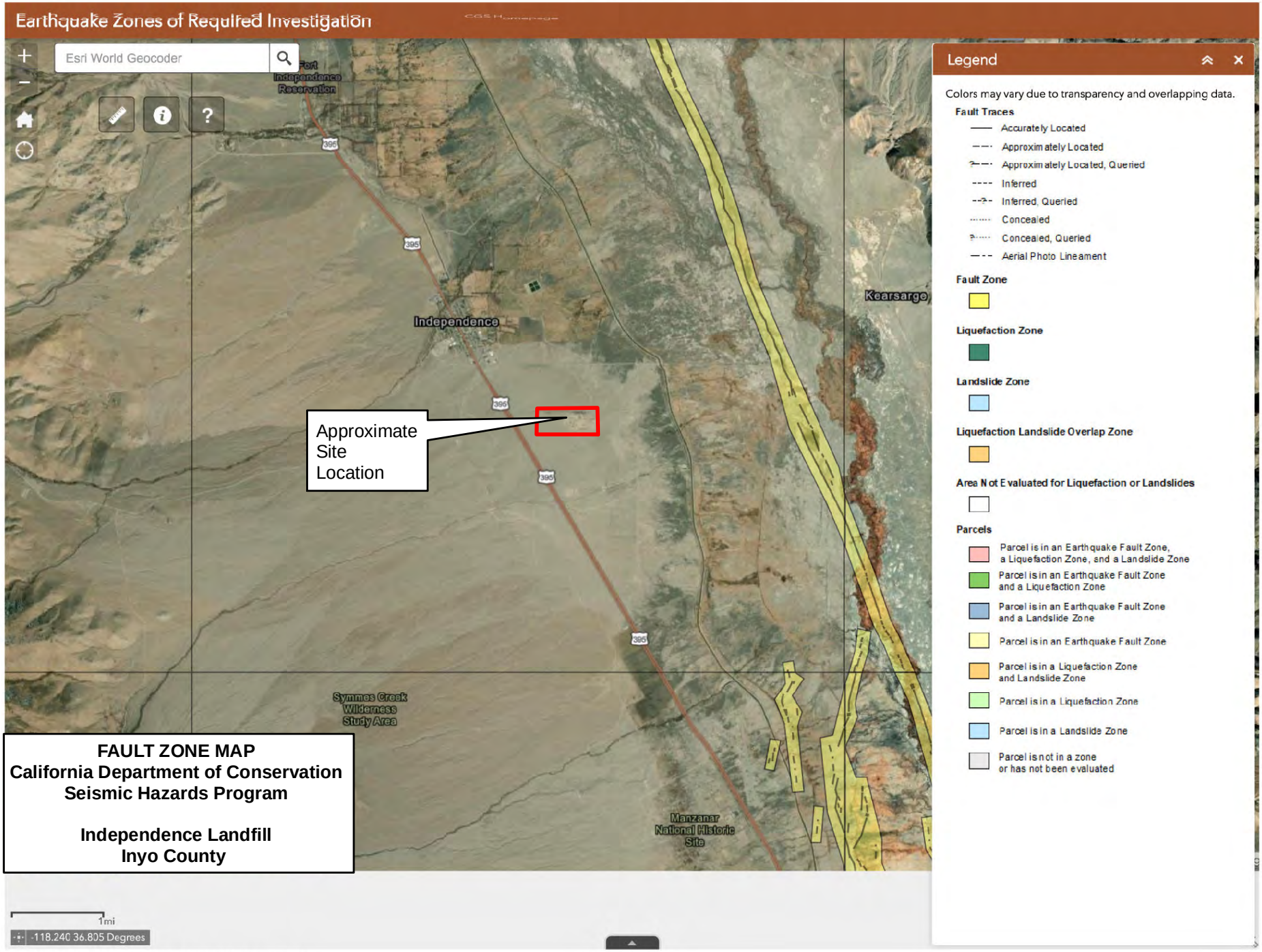
CALIFORNIA NATURAL DIVERSITY
DATABASE QUERY RESULTS
Biological Resource Assessment
Lone Pine Landfill
Inyo County
Date: 6/15/2022
Created by: GF

APPENDIX D

EARTHQUAKE FAULT ZONE MAPS

FAULT ZONE MAP
California Department of Conservation
Seismic Hazards Program

Bishop-Sunland Landfill
Inyo County


Earthquake Zones of Required Investigation
Esri World Geocoder
Fort Independence Reservation
Independence
Kearsarge
Approximate Site Location
Symmes Creek Wilderness Study Area
Manzanar National Historic Site
FAULT ZONE MAP
California Department of Conservation
Seismic Hazards Program
Independence Landfill
Inyo County
1mi
-118.240 36.805 Degrees
Legend
Colors may vary due to transparency and overlapping data.
Fault Traces
Accurately Located
Approximately Located
Approximately Located, Queried
Inferred
Inferred, Queried
Concealed
Concealed, Queried
Aerial Photo Lineament
Fault Zone
Liquefaction Zone
Landslide Zone
Liquefaction Landslide Overlap Zone
Area Not Evaluated for Liquefaction or Landslides
Parcels
Parcel is in an Earthquake Fault Zone, a Liquefaction Zone, and a Landslide Zone
Parcel is in an Earthquake Fault Zone and a Liquefaction Zone
Parcel is in an Earthquake Fault Zone and a Landslide Zone
Parcel is in an Earthquake Fault Zone
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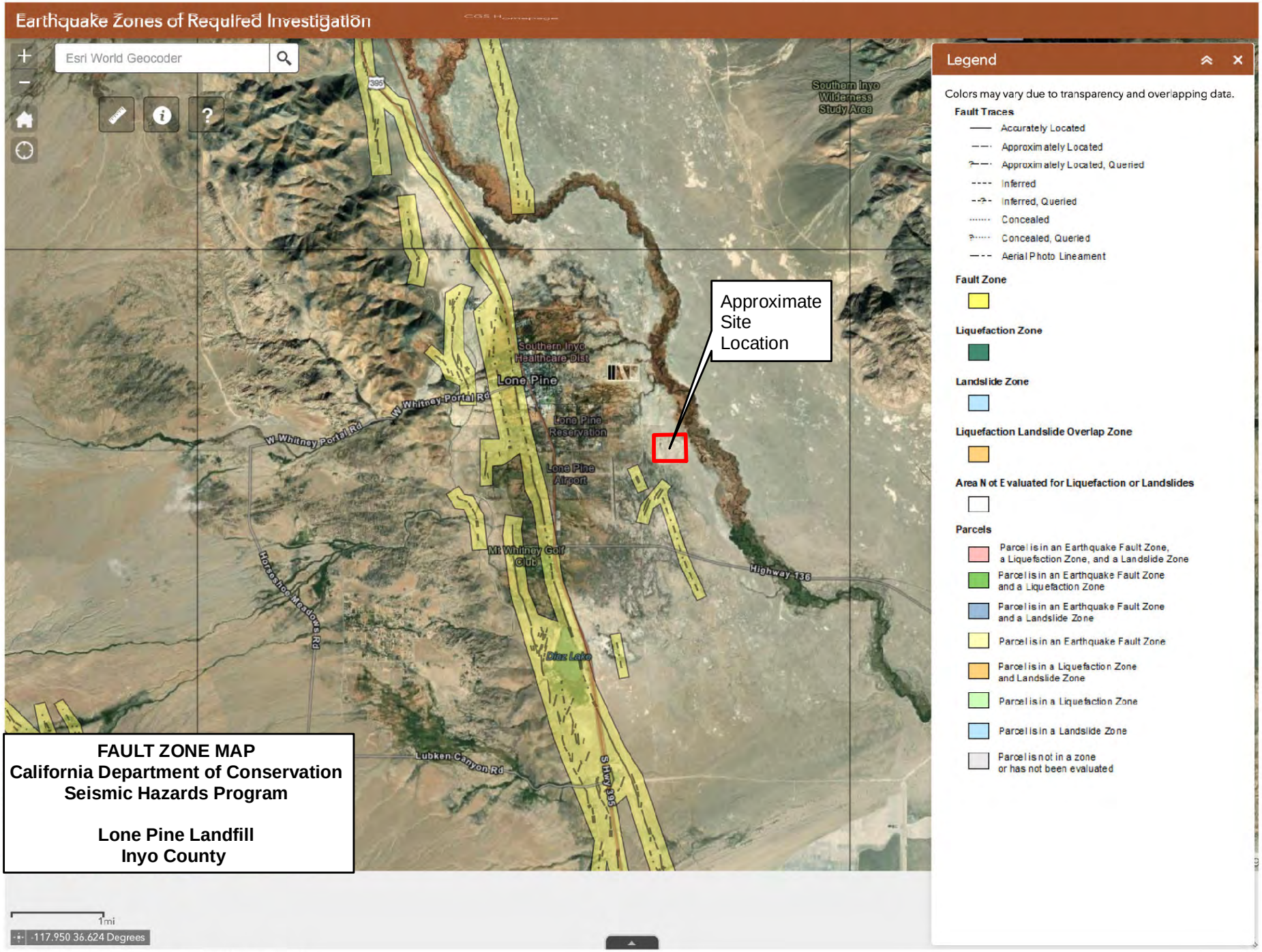
Parcel is in a Landslide Zone
Parcel is not in a zone or has not been evaluated


Earthquake Zones of Required Investigation
Esri World Geocoder
Legend
Colors may vary due to transparency and overlapping data.
Fault Traces
Accurately Located
Approximately Located
Approximately Located, Queried
Inferred
Inferred, Queried
Concealed
Concealed, Queried
Aerial Photo Lineament
Fault Zone
Liquefaction Zone
Landslide Zone
Liquefaction Landslide Overlap Zone
Area Not Evaluated for Liquefaction or Landslides
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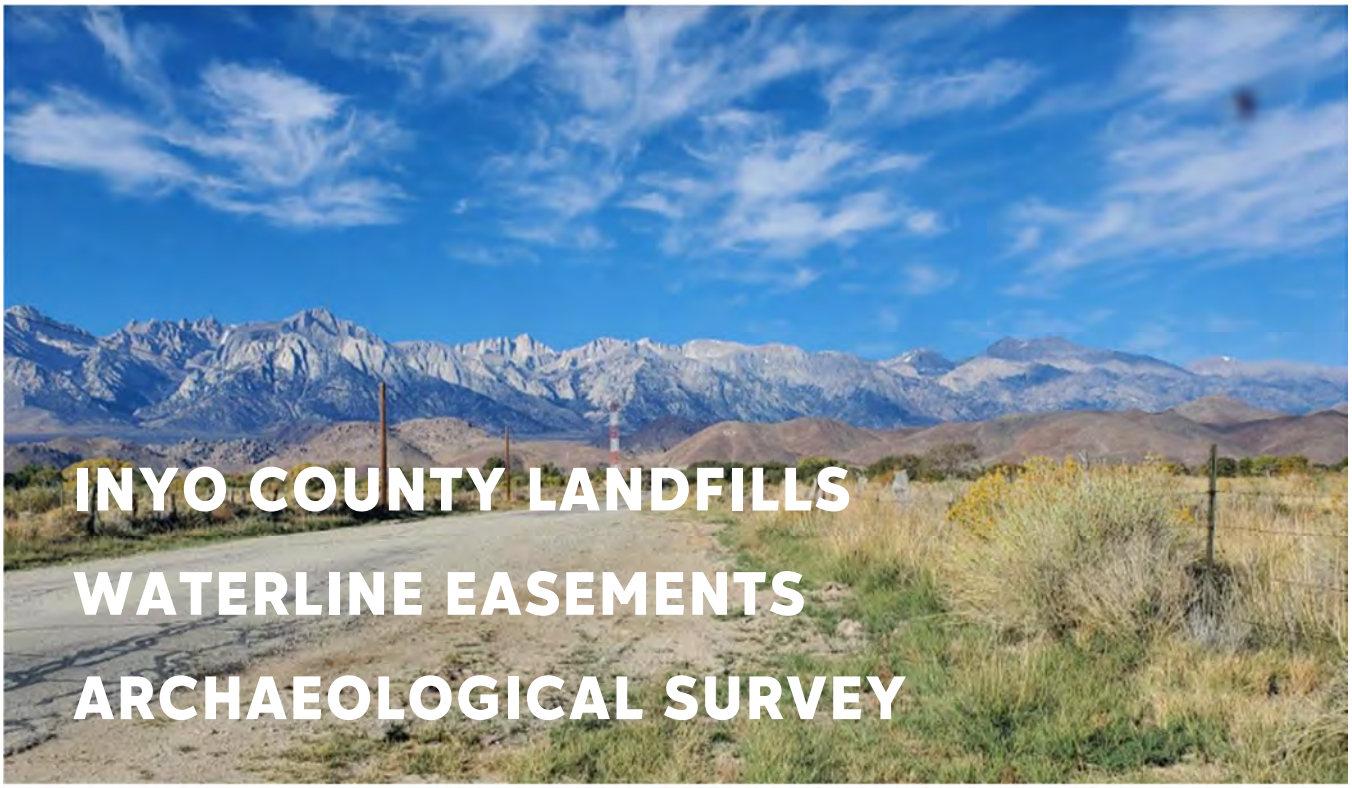
Parcel is in an Earthquake Fault Zone, a Liquefaction Zone, and a Landslide Zone
Parcel is in an Earthquake Fault Zone and a Liquefaction Zone
Parcel is in an Earthquake Fault Zone and a Landslide Zone
Parcel is in an Earthquake Fault Zone
Parcel is in a Liquefaction Zone and Landslide Zone
Parcel is in a Liquefaction Zone
Parcel is in a Landslide Zone
Parcel is not in a zone or has not been evaluated
Approximate Site Location
Southern Inyo Wilderness Study Area
Southern Inyo Healthcare Dist
Lone Pine
W Whitney Portal Rd
Lone Pine Reservation
Lone Pine Airport
Mt Whitney Golf Club
Horseshoe Meadows Rd
Diaz Lake
Highway 136
Lubken Canyon Rd
US Hwy 395
FAULT ZONE MAP
California Department of Conservation
Seismic Hazards Program
Lone Pine Landfill
Inyo County
1mi
-117.950 36.624 Degrees

APPENDIX E

SUMMARY OF ARCHAEOLOGICAL SURVEY
OCTOBER 2023

TEAMENVIRONMENTAL.COM
760-872-1033
459 W. Line Street, Suite A
Bishop, CA 93514



INYO COUNTY LANDFILLS WATERLINE EASEMENTS ARCHAEOLOGICAL SURVEY

OCTOBER 2023

Lone Pine and Independence Landfill Access Roads
Inyo County, California

Prepared For:
Inyo County Department of Public Works
168 North Edwards Street
Independence, CA 93526

Contents

EXECUTIVE SUMMARY

This report describes the results of an archaeological investigation conducted to assess whether the establishment and purchase of easements along existing roads in Independence and Lone Pine for extension of the town water systems to the respective landfills would have potential to impact cultural and tribal resources. TEAM Environmental, Inc., conducted both a records search and a field survey of the proposed easement alignments.

To minimize new ground disturbance, trenches for the waterlines would be placed in areas previously disturbed by road construction. Along paved roads, the waterline would be placed in the road shoulder. Along dirt roads, the waterline would be placed in the center of the road. The Independence waterline easement is expected to be 6 ft wide and 7,551 ft long. The Lone Pine waterline easement is expected to be 6 ft wide and 7,494 ft long.

Results are detailed in the appendix, which is not included with the public version of this report. To summarize, several pre-contact Indigenous artifacts and dense scatters of twentieth-century trash had been previously recorded in the vicinity of both proposed easements. None of the previously recorded Independence archaeological resources occur in the proposed easement, but the Lone Pine easement would cross one multi-component (historic and Indigenous) site that is considered a contributing element of the Patsiata Historic District. The Patsiata Historic District is a traditional cultural property for five Tribes with ties to the Owens Valley and is pending listing in the National Register of Historic Places.

The field survey included a corridor 40 to 50 ft wide (including the roads themselves) along the proposed easement corridors. A variety of artifacts were encountered, including beverage cans, bottle fragments, concrete fragments, miscellaneous metal and pipe sections. Most appear to be the result of trash disposal rather than camping or other occupation. The only Indigenous artifacts encountered were two isolated obsidian flakes along the Independence corridor. However, visibility of the ground surface along much of the Lone Pine corridor was obscured by dense grass. That reduced visibility and the fact that the Lone Pine easement would cross a previously recorded site suggest that an additional measure is warranted: monitoring by a Tribal monitor or archaeologist is recommended to ensure no cultural resources are impacted when the Lone Pine waterline trench is excavated.

PROPOSED PROJECT

The archaeological survey described in this report was conducted in support of a project titled "Purchase of Three Parcels from the City of Los Angeles by Inyo County, Without Water Rights, for Continued Operation of Bishop–Sunland, Independence, and Lone Pine Landfills." As the project title indicates, the project entails a change in property ownership to facilitate Inyo County's continued operation of the three existing landfills and its compliance with applicable laws and regulations.

Both landfills have been operated by the County since at least 1965. Although the change in ownership would not alter current management or expand the footprint of the three landfills, one aspect of the project could potentially disturb previously undisturbed land, and thus has the potential to affect cultural resources. Currently, Inyo County trucks water to the Independence and Lone Pine landfills. As part of the project, Inyo County would purchase easements which would allow Inyo Public Works to extend the Independence and Lone Pine water systems to each of their landfills in the future. The County would place the waterlines in the existing shoulders of paved roads or along the centerline of existing dirt roads, but it is possible that trenching for the water lines could reach undisturbed sediments. At present, the easement is expected to be 6 ft wide and 7,551 ft from the town of Independence to the Independence Landfill (Figures 1 and 2), and 6 ft wide and 7,494 ft long from the town of Lone Pine to the Lone Pine Landfill (Figure 3 and 4).

The archaeological survey was conducted to identify archaeological sites that might be in the proposed easements, and to determine if mitigation and/or monitoring will be necessary to avoid adverse impacts.

Figure 1. Portion of the proposed Independence waterline easement route, view toward SW.

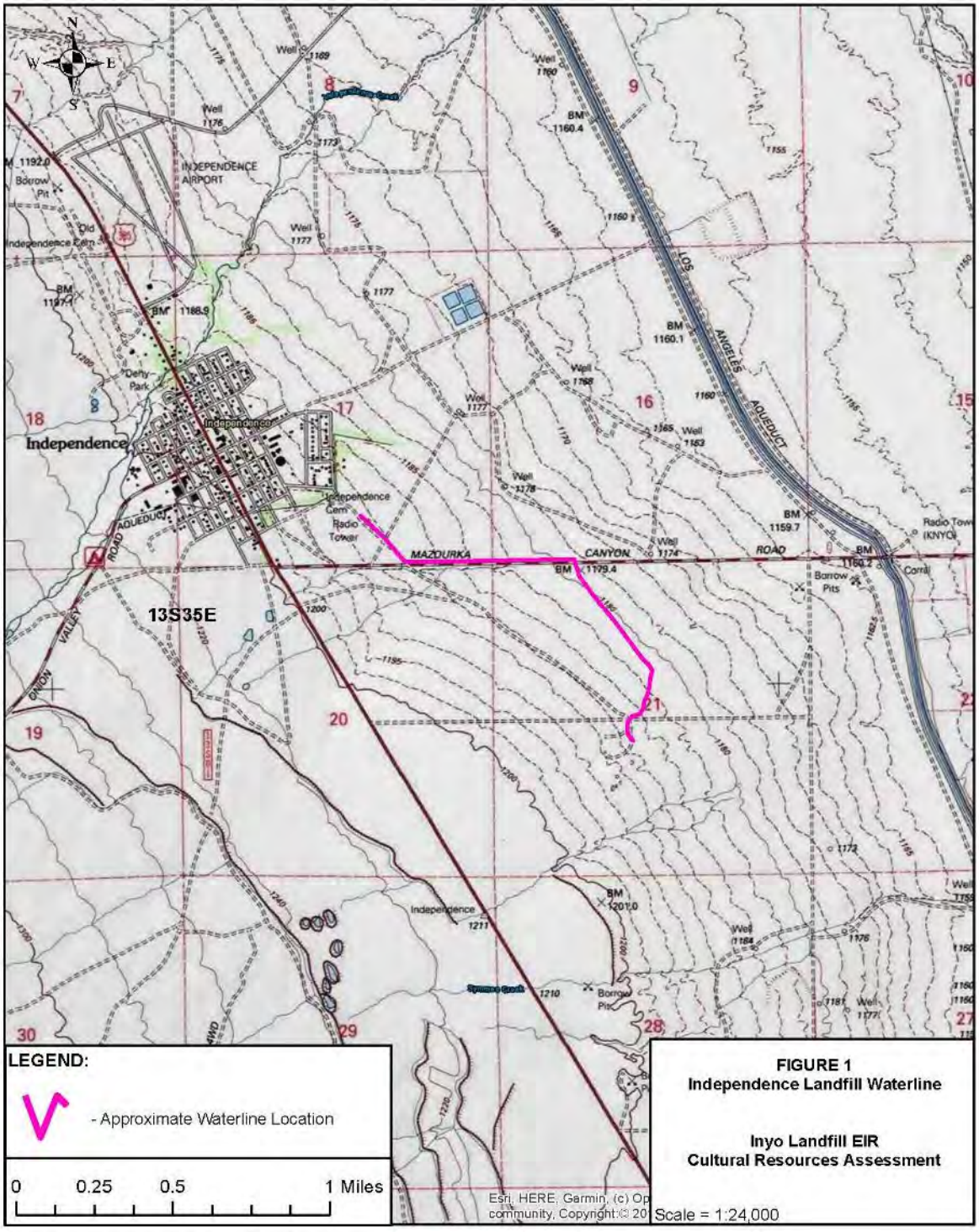


Figure 2. Location map, proposed Independence Landfill Waterline easement.

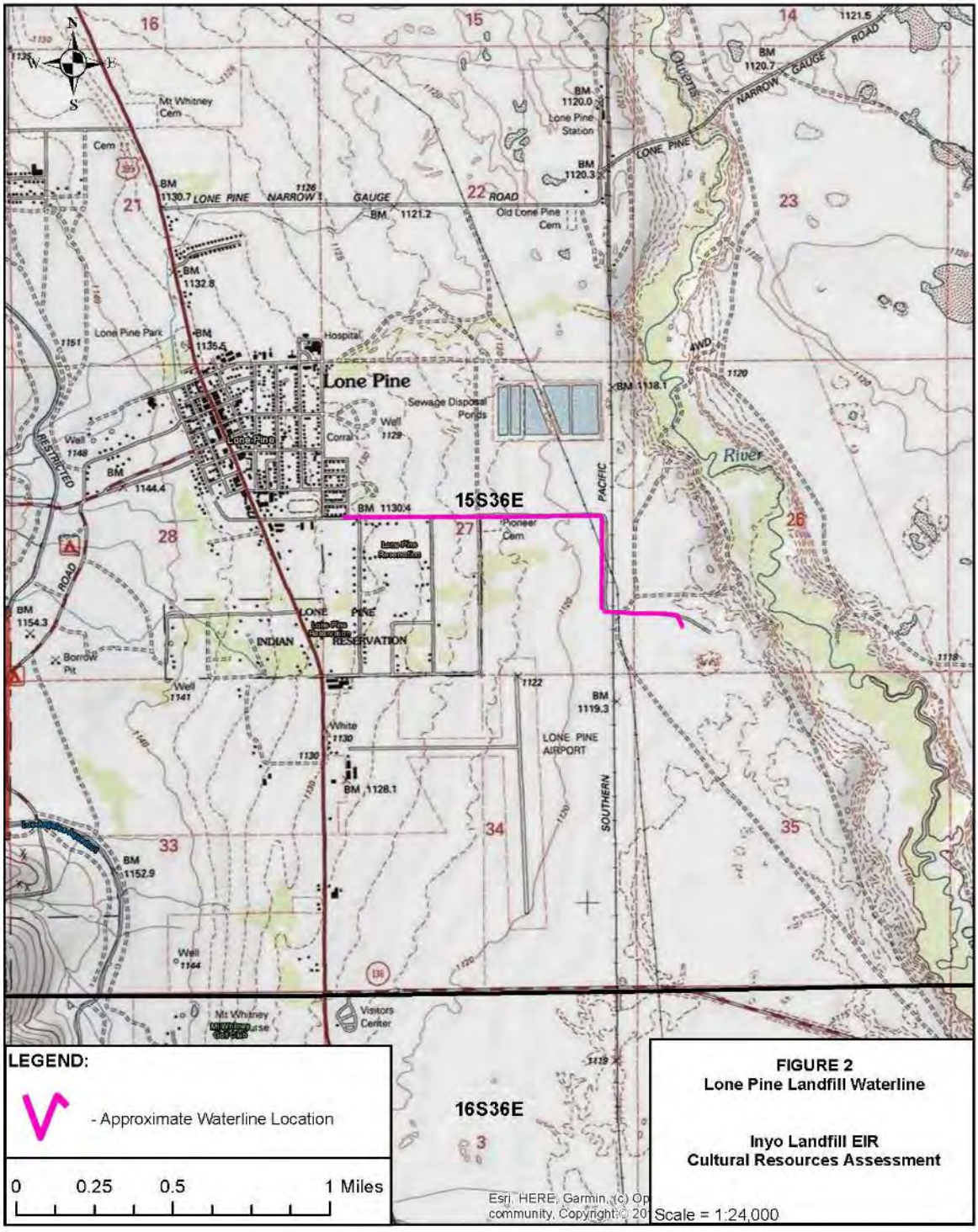


Figure 3. Location map, proposed Lone Pine Landfill Waterline easement.

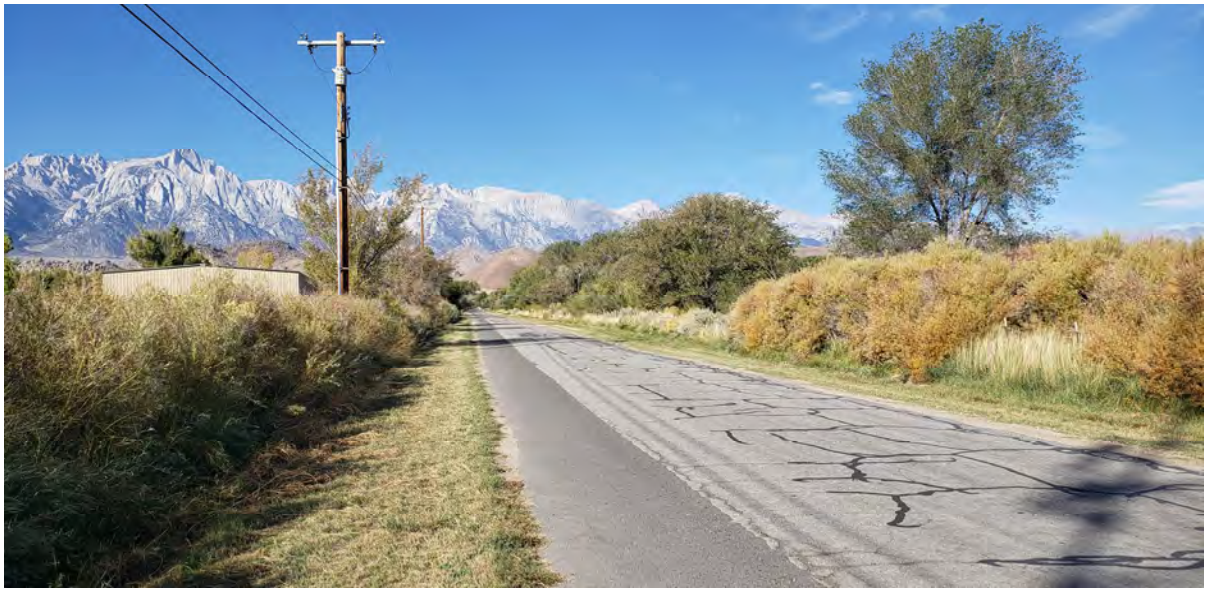


Figure 4. Portion of the proposed Lone Pine waterline easement, view to west. Part of the Lone Pine Paiute-Shoshone Reservation is left of the road. Dense grass and other vegetation obscure ground visibility along Sub Station Road. Note also the strip of newer asphalt along the left edge of the pavement that indicates previous trenching.

BACKGROUND AND ENVIRONMENTAL SETTING

Both proposed easements are located on the floor of the Owens Valley, in the desert scrub vegetation community. Slopes are nearly level in both easement areas, and soils are composed mostly of sands, silts, and gravels derived from the Sierra Nevada, which rises up to 14,000 ft elevation less than 15 miles to the west. The environmental setting has been a rich environment for humans since time immemorial: the region is the traditional home of the Owens Valley Paiute or Nüümü, whose oral histories place them in Owens Valley (Payahuunadü) and the surrounding mountains since the beginning of time. Euroamericans began settling in Owens Valley in the nineteenth century, and they too have left traces of their occupation in archaeological sites and features.

Rabbitbrush *(Ericameria nauseosa)*, buckwheat (*Eriogonum*), and saltbush (*Atriplex*) dominate the majority of both waterline routes, but the Lone Pine waterline would pass through heavy grass adjacent to irrigated lawns and pastures that also support landscape vegetation as well as willows and cottonwood trees. Russian thistle (Salsola) grows densely in some parts of project area. Both easements, while well-outside of the riparian vegetation associated with the river, are near enough to be associated with previous areas of riparian vegetation and traditional tribal uses of the Owens River corridor. If surface water were available closer to the proposed easements in pre-contact times, this would increase the likelihood of finding cultural resources in the area.

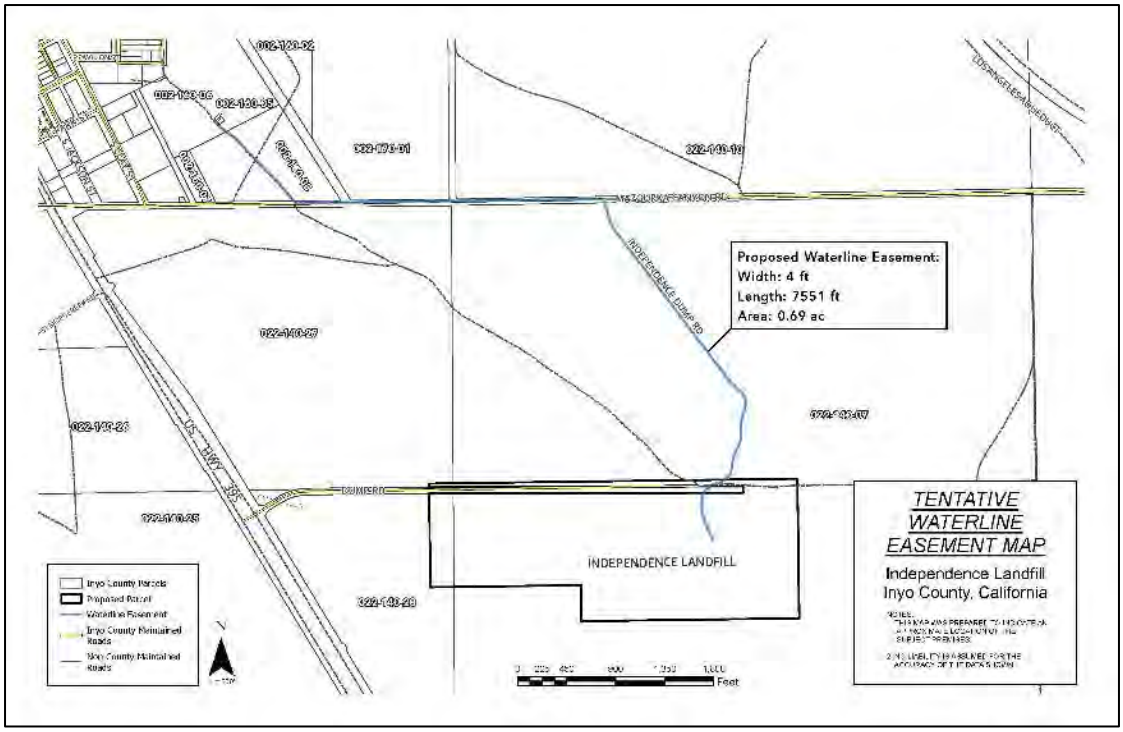


Figure 5. Parcel map for Independence Waterline Easement.

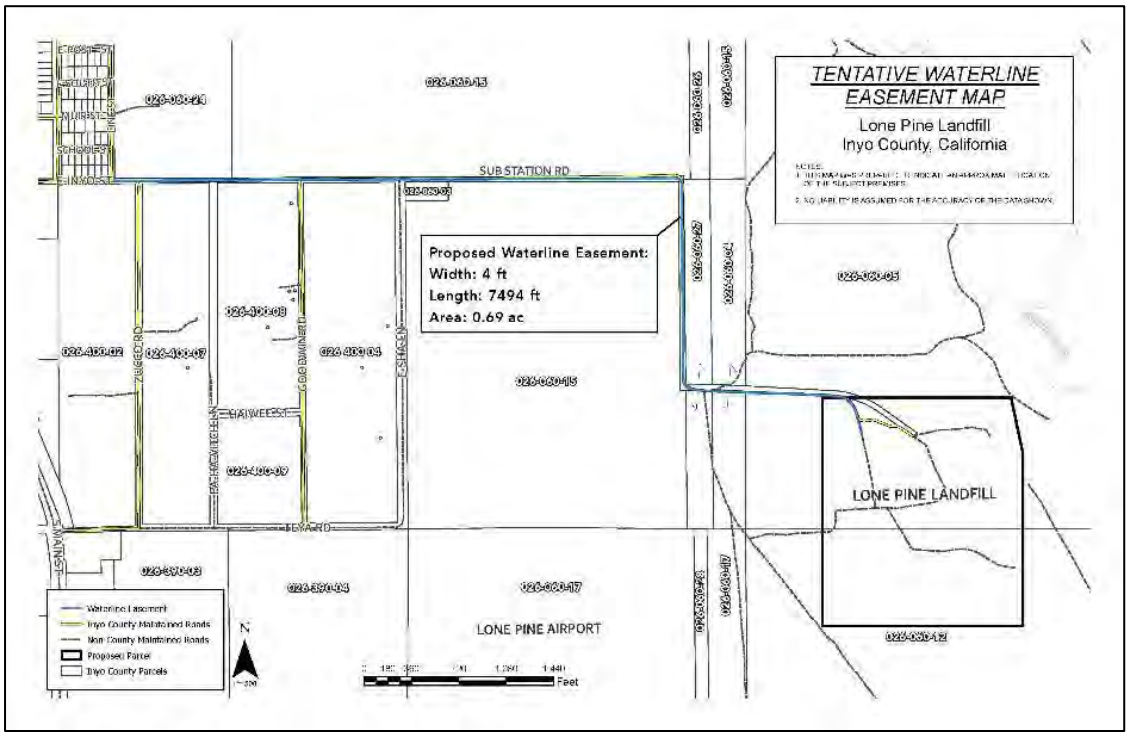


Figure 6. Parcel map for Lone Pine waterline easement.

The waterline easement for Independence Landfill, depicted in Figure 5, would extend from the existing waterline at Parcel 002-160-05, across parcel 002-160-08, along the shoulder of Mazourka Canyon Road, down the centerline of existing (dirt) Independence Dump Road, for a total length of approximately 7551 ft (1.43 miles).

The waterline easement for Lone Pine Landfill, depicted in Figure 6, would extend from the existing waterline at the intersection of E. Inyo Street and Line Street, along the shoulder of Sub Station Road, for a total length of approximately 7494 ft (1.42 miles). The Lone Pine route borders part of the Lone Pine Paiute-Shoshone Reservation and is crossed by Southern California Edison's 115 kV transmission line, constructed in 1912. Towers T462, T463, and T465 are adjacent to the project area. Part of the route parallels an abandoned track of the Southern Pacific Railroad, built from 1908-1910 to support the Los Angeles Aqueduct construction. The Lone Pine Pioneer Cemetery is south of Sub Station Road, adjacent to the project area.

RECORDS SEARCH RESULTS

On September 7, 2023, a records search was initiated with the regional office of the California Historical Resources Inventory System (CHRIS) at the Eastern Information Center (EIC), University of California, Riverside. As the designated information center for Inyo, Mono, and Riverside counties, the Eastern Information Center maintains copies of archaeological reports and site records for the area. The results, which included archaeological site and survey information for both project areas and an adjacent quarter-mile buffer, are included in a Confidential appendix and summarized below.

Independence Records

Two sites adjacent to the proposed easement route along Mazourka Canyon Road were recorded as part of a survey for the Digital 395 Project. CA-Iny-8391 (P14-10961) is a multicomponent scatter with historic trash, 8 flakes, and 13 Owens Valley Brownware sherds, located 20 m north of Mazourka Canyon Road. CA-Iny-8392 (P14-10962) is another multi-component site, with a lithic scatter, pottery sherds, and 20th-century trash, located 40 meters north of the road. As part of the SCE 112 kV transmission line survey, SWCA recorded three brownware sherds 13m north of Mazourka Canyon Road (P14-014225/CA-Iny-010660). To the west of the project area is another 20th-century refuse scatter (P14-12764/ LADWP0027) interpreted as a dumping location for residents of Independence. Urbana recorded the Mazourka Canyon Road itself as P14-14322, and considered the road significant for its role in the Euroamerican development of the Owens Valley and Inyo Mountains. Urbana's site record also notes that A.W. Von Schmidt mapped an "Indian Rancheria" in Section 16, a little over half a mile from the project area.

Lone Pine Records

Previous archaeological surveys had been conducted in the vicinity to record archaeological sites on the Lone Pine Paiute-Shoshone Reservation (Brooks et al. 1977) and for various projects: fuels treatment (Velasquez 2010a, b); a sewer line (Chaloupka 1977); the Owens River Water Trail Project (Vader and Lockwood 2019); and proposed replacement of the SCE transmission line (SWCA 2020). A variety of pre-contact Indigenous artifacts were found, including flaked stone, ground stone, and pottery. Post-contact features include the railroad grade (previously recorded as CA-INY-4607H), some cut-off telephone or telegraph pole remnants associated with the train, and a livestock pen. Not surprisingly for an area on the outskirts of a small town and adjacent to the modern landfill, the surveys encountered an enormous amount of trash, most of it interpreted as trash dumps of domestic household refuse. After a detailed pedestrian survey conducted for proposed upgrades to the transmission line, SWCA combined several of the sites into one large multicomponent site, CA-INY-5296H (P14-005649), which is over a mile in length and up to almost a half mile wide. This site is listed as a contributing resource in the Patsiata Historic District National Register nomination.

Sub Station Road itself was recorded as a site by Urbana Preservation and Planning (14-14347). Urbana interpreted historic maps to indicate that Sub Station Road was constructed prior to 1907 as a main wagon road. It later provided access to the SCE Control-Haiwee-Inyokern 115kV Transmission Line and the SCE Control-Coso-Haiwee-Inyokern 115kV Transmission Line (modern-day segments of the SCE Bishop Creek to San Bernardino 89kV "Tower Line") and the Owens River. The road was found ineligible for the National Register of Historic Places and the California Register of Historical Resources.

H.S. Riddell recorded sites in the vicinity in the 1950s, with pottery, ground stone, obsidian, slate, steatite bead, ceramic pipe, projectile points, and mussel shell, but subsequent visits to verify the locations found much-reduced artifact assemblages.

FIELD SURVEY METHODS AND RESULTS

Waterline installation would be planned to minimize disturbance: Inyo County would install the waterlines along the shoulder of paved roads, or in the center of unpaved roads. Although the easement is expected to be only 6 feet wide, a corridor approximately 50 feet wide centered on the access roads was surveyed to provide some flexibility in placement and to ensure adequate survey coverage. The Independence waterline easement was surveyed by Mary Farrell and Beth Deaton of TEAM Environmental, Inc., on October 7, 2023; the same two archaeologists surveyed the Lone Pine waterline easement on October 21, 2023. One traverse was walked along both sides of the paved roads. When an artifact or feature was encountered, additional areas were surveyed around it to determine if it was associated with a larger archaeological resource or an isolated find.

Both access routes have a fair amount of modern roadside litter, much of it apparently falling out from unsecured loads on the way to the landfills. Features and artifacts deemed modern were noted but not recorded in detail; these included aluminum cans, beverage cans with aluminum tops, cardboard, clothing, Styrofoam, plastic, modern bottle and bottle fragments, window glass, wire, lumber fragments, concrete block, glazed tile fragments, cinders, flagstone, and tires.

Each artifact or feature encountered that had diagnostic characteristics indicating it was more than 50 years old was plotted with an Android GIS mapping program. Along the Lone Pine road, the points were connected to a Geode Sub-Meter GPS Receiver. No permanent field datums were established and no artifacts were collected. A selection of artifacts and features were photographed.

Independence Waterline Easement Survey Results

Along the unpaved road segments, vegetation is sparse and ground visibility was good, with an estimated 60 to 90 percent of the ground surface visible. Along the paved road segments, there was little vegetation, and recent grading of shoulders provided a fresh surface to inspect.

There is evidence of extensive dumping along the Independence easement, especially immediately adjacent to the pumping station and most abundantly as the road nears the landfill. Little of the latter was recorded as it was judged to be an extension of dumping activity at the landfill itself. Artifacts are listed and mapped in the Appendix. All are consistent with roadside dumping, with three exceptions:

- Two obsidian flakes were found approximately 168 m apart (location in Confidential Appendix). The locations are not associated with any previously recorded sites, nor were other artifacts found in the immediate area. They appear to be isolates.

- A scatter of stones, some partially and shallowly buried, was different in size and distribution than what was observed in the rest of the area. No associated artifacts were found. While this is likely a natural feature, it was recorded out of an abundance of caution. Most of this unusual stone scatter is pictured in Figure 7. It is located only 7 ft (2.2 m) from the edge of the dirt road south of Mazourka Canyon Road, but the trench would be in the center of the road, so would be unlikely to impact this feature.

- The fill dirt around a telephone pole was filled with dozens of tiny clam shells, suggesting the dirt was brought in from the river or another nearby watercourse or flooded area (Figures 8 and 9).

Figure 7. Scatter of stones, with tape measure for scale. Located approx. 7 ft from the dirt road edge, this possible feature is outside the proposed waterline easement.

Figure 8. Utility pole where shell fragments were noted, suggesting previous flooding or that flood deposits or stream banks were used as fill.

Figure 9. Detail of shell.

Lone Pine Waterline Easement Survey Results

In Lone Pine, a limited number of historic artifacts were found. Most appear to be associated with previously recorded sites and are consistent with episodes of domestic refuse disposal. Artifacts and features are listed and mapped in the Appendix. A few small fragments of pre-1918 sun-colored amethyst bottle glass were likely the oldest artifacts encountered; they were found in a small concentration of glass and metal fragments, but the presence of plastic in the same area suggests the feature represents multiple decades of sporadic roadside dumping. Approximately 20 ft from the paved road edge, the concentrated dump feature containing pre-1918 glass is outside of the proposed waterline easement. There are irrigation ditches throughout the area and one ditch crosses under the road through a culvert with concrete headwalls (Figure 10). No pre-contact Indigenous artifacts, such as pottery or flaked or ground stone, were observed. The fence for the Lone Pine Pioneer Cemetery is over 10 ft from the pavement edge (Figure 11).

Figure 10. Irrigation ditch that crosses under Sub Station Road. View toward SSW.

Figure 11. White picket fence bounds the Lone Pine Pioneer Cemetery, south of Sub Station

Road. View to SW.

EVALUATION

None of the artifacts or features found during the field survey would be considered significant cultural resources in themselves, nor do they appear to be important parts of the previously recorded archaeological sites. Beverage cans with bullet holes along the Independence waterline easement corridor suggest target practice (and maybe camping or picnicking) occurred on site, but most of the artifacts appear to be secondary deposits of domestic trash, or in some cases, landscaping demolition debris. Survey results suggest that no significant cultural resources would be affected by the Independence waterline easement.

Survey results for the Lone Pine waterline easement are similar: no Indigenous artifacts or features and no artifacts or features clearly over 50 years in age were found in the Sub Station Road shoulder, where the easement would be located. However, the road (and the waterline easement) would pass through the boundaries of a previously recorded multi-component site that consists of Indigenous artifacts as well as twentieth-century trash. This site is considered a contributing element of the Patsiata (Owens Lake) Historic District, which is pending approval for listing in the National Register of Historical Resources as a Traditional Cultural Property. Even though no surface evidence of historic Indigenous occupation was observed in the project area, visibility of the ground surface was limited, and there may be buried cultural deposits obscured by recent disturbance or natural vegetation.

SUMMARY AND RECOMMENDATIONS

Monitoring of the waterline trench excavation from Lone Pine to the Lone Pine Landfill is recommended to ensure no significant impacts to significant cultural resources as a result of the proposed project. Because the waterline passes through a site that is part of the Patsiata Historic District traditional cultural property, monitoring would most appropriately be conducted by a trained Tribal monitor. The Lone Pine Paiute-Shoshone Reservation Tribal Historic Preservation Officer, who coordinates monitor schedules, should be provided at least two weeks' notice as well as funding for the work. Alternatively, an archaeologist could monitor the trenching, with results reported to the Lone Pine Paiute Shoshone Tribe and the County.

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DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION: PURCHASE OF THREE PARCELS FROM THE CITY OF LOS ANGELES BY INYO COUNTY, WITHOUT WATER RIGHTS, FOR CONTINUED OPERATION OF BISHOP-SUNLAND, INDEPENDENCE, AND LONE PINE LANDFILLS

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