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## **DRAFT MITIGATED NEGATIVE DECLARATION OF ENVIRONMENTAL IMPACT** **AND INITIAL STUDY**

**PROJECT TITLE:** Conditional Use Permit (CUP) 2024-06; Telecom Plan Update (TPU) 2024-02/Verizon-Sequoia-Lone Pine

**PROJECT LOCATION:** The proposed project site is located at 1203 Lubken Canyon Road, Lone Pine, CA, on property owned by Scott and Mary Kemp, with Tax Assessor Parcel Number (APN) 026-150-30 (please see attached map).

**PROJECT DESCRIPTION:** The applicant has applied for a CUP and TPU to install a 105-foot monopole telecommunications tower to house six 6-foot panel antennas, three 3-foot panel antennas, along with six remote radio units, two surge suppressors and two 4-foot microwave dishes. The project includes three cabinets, one GPS antenna, five service lights, a fiber teleco box, two surge suppressors and a 30KW backup generator on concrete pads within a 900 square feet lease area contained within an eight-foot chain link fence. Fiber will come through approximately 750 feet of underground trenching. The project is to increase the capacity of the existing Verizon Wireless network in the area, as well as offload usage on an existing site and add capacity to the outdoor recreation areas to the west of the site which includes Mount Whitney Portal.

### **FINDINGS:**

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

*The proposed project is consistent with the County General Plan designation of 'Agriculture' (A) as the A designation allows for public and quasi-public uses. The Verizon antennas will provide a service use of a public/quasi-public nature by extending the capacity of the existing Verizon Wireless network in the area, which will improve phone and wireless internet service as well as to upgrade these services to customers in the area.*

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

*The proposed project is consistent with the County Zoning Ordinance designation of 'Open Space' (OS) as the OS designation allows, as a conditional use, public and quasi-public uses. These include buildings and uses that are of a recreation, religious, cultural or public service nature. Telecommunications antennas are considered a use of a public service nature.*

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

*Based on the information provided by the applicant, and staff's review, the tower could have aesthetic and biological impacts. However, with the incorporation of the mitigation measure recommended below, it has been found that the project will not result in significant adverse impacts.*

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

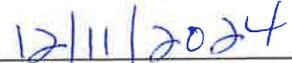
*Aesthetic and biological mitigation measures will be designed into the project, as conditions of approval for the proposed future telecommunications tower, as follows:*

- 1. The monopole tower shall have a low finish polish to prevent glare.*
- 2. Prior to construction, a botanical survey shall be conducted during the appropriate blooming period to determine the presence or absence of sensitive plant species, specifically *Sidalcea covillei* (Owens Valley Checkerbloom). If this species is identified within the proposed project area and cannot be avoided, necessary permits shall be obtained before proceeding.*
- 3. Prior to Construction, the applicant shall perform a wetlands area and wetlands delineation.*
- 4. Construction activity should avoid the avian nesting season (February- August). If construction activity must occur during the nesting season, a qualified biologist shall perform a pre-construction clearance survey to determine the presence/absence of nesting activity onsite and in the vicinity of the project site. The survey shall address impacts to nesting birds per the Migratory Bird Treaty Act. If no nesting activity is observed, no further action is required. If nesting activity is observed on or in the immediate vicinity of the project site, construction activity may proceed after the nestlings have fledged. If the facility must be installed in the vicinity of an active nest, a biological monitor shall be present during all construction activities, and construction activity shall be conducted at the discretion of the monitor to ensure that it does not directly or indirectly cause a nest to fail.*

The 30-day public review period for this Draft Mitigated Negative Declaration will expire on January 13, 2025. Inyo County is not required to respond to any comments received after this date.

Additional information is available from the Inyo County Planning Department. Please contact Project Planner if you have any questions regarding this project.

  
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Cathreen Richards  
Director, Inyo County Planning Department

  
\_\_\_\_\_  
Date

# INYO COUNTY PLANNING DEPARTMENT

## CEQA APPENDIX G: INITIAL STUDY & ENVIRONMENTAL CHECKLIST FORM

### EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, “Earlier Analyses,” may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

- a) the significance criteria or threshold, if any, used to evaluate each question; and
- b) the mitigation measure identified, if any, to reduce the impact to less than significance issues.



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## INYO COUNTY PLANNING DEPARTMENT

### APPENDIX G: CEQA INITIAL STUDY & ENVIRONMENTAL CHECKLIST FORM

1. Project title: Conditional Use Permit (CUP) 2024-06; Telecom Plan Update (TPU) 2024-02/Verizon-Sequoia-Lone Pine
2. Lead agency name and address: Inyo County Planning Department, PO Drawer L, Independence, CA 93526
3. Contact person and phone number: Danielle Visuaño: 760-878-0268
4. Project location: The proposed project site is located at 1203 Lubken Canyon Road, Lone Pine, CA, Tax Assessor Parcel Number (APN) 026-150-30
5. Project sponsor's name and address: Verizon Wireless – c/o Armando Montes with Sequoia Development Services, 1 Spectrum Pointe, Lake Forest, CA 92630
6. General Plan designation: Agriculture (A)
7. Zoning: Open Space (OS)
8. Description of project: The applicant has applied for a CUP and TPU to install a 105-foot monopole telecommunications tower to house six 6-foot panel antennas, three 3-foot panel antennas, along with six remote radio units, two surge suppressors and two 4-foot microwave dishes. The project includes three cabinets, one GPS antenna, five service lights, a fiber teleco box, two surge suppressors and a 30KW backup generator on concrete pads within a 900 square feet lease area contained within an eight-foot chain link fence. Fiber will come through approximately 750 feet of underground trenching. The project is to increase the capacity of the existing Verizon Wireless network in the area, as well as offload usage on an existing site and add capacity to the outdoor recreation areas to the west of the site which includes Mount Whitney Portal.
9. Surrounding land uses and setting: The property is surrounded by mostly undeveloped land and mostly flat desert terrain. To the north is a pet cemetery, the Lone Pine Pheasant Club and the Lone Pine Fire District training facility. The Project area and surrounding vicinity are lightly distributed with road and paths.

Location:	Use:	Gen. Plan Designation	Zoning
North	Residential, Vacant	(RRM) Rural Residential Medium, (NR) Natural Resources, (PF) Public Service Facilities	(P) Public District, (RR) Rural Residential, (OS) Open Space
South	Vacant	(SFL) State and Federal Lands, (RP) Rural Protection Designation	(OS) Open Space

East	Residential, Vacant	(RRM) Rural Residential Medium, (OSR) Open Space and Recreation, (NR) Natural Resources	(RR) Rural Residential, (OS) Open Space
West	Tuttle Creek Rd.	NA	NA

**10. Other public agencies whose approval is required:** Inyo County Building and Safety, Inyo County Public Works, Inyo County Airports, Great Basin Air Pollution Control District, Edwards Air Force Base, China Lake Naval Air Weapons Station, Bicycle Lake Army Airfield at Fort Irwin, and the Ownes Valley Radio Observatory.

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?** Inyo County started the 30-day Tribal Consultation opportunity period according to Public Resource code section 21080.31 by sending out a certified written notices on July 25, 2024, inviting the Tribes to consult on the project. The tribes that were notified are: Big Pine Tribe of Owens Valley, Bishop Paiute Tribe, Fort Independence Indian Community of Paiutes, Lone Pine Paiute-Shoshone Tribe, Timbisha Shoshone Tribe, Twenty-Nine Palms Band of Mission Indians, Cabazon Band of Mission Indians and the Torrez Martinez/Desert Cahuilla Indians and the Kern Valley Indian Community.

*Inyo County did not receive any requests for consultation.*

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

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

**DETERMINATION**

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

  
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Danielle Visuaño, Senior Planner  
Inyo County Planning Department

12/11/24  
\_\_\_\_\_  
Date

# INYO COUNTY PLANNING DEPARTMENT ENVIRONMENTAL CHECKLIST FORM

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

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

*No, the site proposed for the 105-foot monopole tower already has utility poles and wires in the immediate vicinity and the surrounding area is mostly vacant with the exception of a pet cemetery, the Lone Pine Pheasant Club and Lone Pine Fire District training facility to the north. There are single family dwellings located to the distant north and northeast, however, none exist in the immediate north, west, south or east of the project location. The site selection took into consideration the challenging terrain, lack of accessible adjacent utilities, the developed properties and to provide expansion of the overall coverage to the surrounding communities. There are views of the mountains in all directions, but the tower will not significantly interfere with views from the surrounding residences. The tower shall be conditioned to have a low finish polish to prevent glare. Therefore, this project will not 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?

*No, the proposed tower and antennas will not damage scenic resources as the surrounding terrain is flat desert and it will not block the view of nearby trees or important rock outcroppings. The tower is a monopole tower. There are no historic buildings in the general area and the proposed tower and antennas are not located within a state scenic highway.*

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

*No, the site proposed for the 105-foot monopole tower already has utility poles and wires in the immediate vicinity and is the surrounding area is mostly vacant with the exception of the Lone Pine Pheasant Club. There are views of the mountains in all directions but the tower will not significantly interfere with views from traffic on the surrounding roads or other public views. This includes the views from the Pheasant Club which is slightly northwest of the tower. The south, west and northern views of the Sierra Mountain from the club are not impacted by the tower, and the view of the Inyo Mountains to east are also not impacted by the tower. Therefore, this project will not have a substantial adverse effect on the existing visual character or quality of the site or surroundings.*

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

*No, the tower and antennas will not create a new source of substantial light or glare that would adversely affect day or nighttime views. There are five maintenance lights at the bottom of the tower that will only be utilized when needed during maintenance and have an automatic shutoff. The tower does not require security lighting and does not require any other additional lighting. The tower will also be conditioned to have a low finish polish to prevent glare.*

**II. AGRICULTURE AND FOREST RESOURCES:** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including The Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology Provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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? <i>No, the Project is not located on land designated as Farmland.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? <i>No, the Project is not located on land zoned exclusively for agriculture. Inyo County has no Williamson Act contracts.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))? <i>No, the Project is not zoned for forest or timberland.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use? <i>No, the Project is not located on forestland.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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? <i>No, the Project is not located on Farmland.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**III. AIR QUALITY:** Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

**Would the project:**

a) Conflict with or obstruct implementation of the applicable air quality plan? <i>No, the Project consists of a telecommunications tower. There is not an air quality plan for the area in which the Project is proposed. The Project will be required to follow best management practices for dust control during short-term construction. Once the construction is complete, dust from the operations will be minimal and primarily from personnel vehicle use.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? <i>No, the Project consists of a telecommunications tower and will not cause a violation of an air quality standard.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? <i>No, the Project consists of a telecommunications tower and will not cause a violation of an air quality standard. No additional projects within the vicinity of this Project have been identified that are likely to be under construction during the same time period as this Project that would result in cumulatively significant impacts due to particulate matter.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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d) Expose sensitive receptors to substantial pollutant concentrations?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project will not expose sensitive receptors to any new substantial pollutant concentrations. The Project site is in a remote and rural location surrounded by vacant desert terrain. Due to the remote location, construction and operation of the Project will not impact sensitive receptors.*

e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project consists of a telecommunications tower and will not cause objectionable odors.*

**IV. BIOLOGICAL RESOURCES: Would the project:**

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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*No, less than Significant with Mitigation Incorporated. A biological survey was conducted by Trileaf Corporation (Trileaf) biologist Mr. Manfred Ntoven on July 31, 2024, and a biological report was completed September 24, 2024. Information regarding biological resources in the project vicinity were obtained through a literature review to document existing conditions of the biological resources. The literature review included using the following resources: California Natural Diversity Data Base (CNDDB); the U.S. Fish and Wildlife's (USFWS) Information for Planning and Consultation (IPaC); and the California Native Plant Society (CNPS) Inventory for Rare and Endangered Plants. According to the report, the project site is lightly developed located within generally desert land with fencing, dirt trails, and other facilities for ranching. Mr. Manfred Ntoven performed the biological survey to document the existing conditions and determine potential impacts to sensitive biological resources based on the current site plans. The biological survey was conducted on foot while making note of biological resources such as plant and wildlife species with special attention paid to any flora or fauna in the immediate project site area to determine the presence or potential presence of any sensitive species that may occur on the site. For the biological report completed after the survey, the terms "sensitive" or "special status" species are considered to be "those plant or wildlife species that are officially listed or proposed for listing under state and/or federal endangered species acts, considered by the CDFW to be a Species of Special Concern (SSC), considered biologically rare, restricted in distribution, or declining throughout their range or within the state of California, or are associated with a habitat that is declining in California at a significant rate." According to the report, there are several sensitive-special status plants or wildlife with the potential to occur on the site, but no sensitive or special status species were observed during the survey conducted on July 31, 2024.*

*For special status plants, while the biologist did not observe any sensitive or special plant species due to the survey occurring outside the typical blooming period for sensitive plant species, the biologist concluded that one sensitive plant species has the potential to occur within one mile of the project area. Although the Owens Valley Checkerbloom (*Sidalcea covillei*) was not identified on the site during the survey, the proposed project footprint will extend directly into mapped habitat for this species. Since there is potential for the Owens Valley Checkerbloom to be present on the project site, prior to construction a botanical survey shall be conducted during the appropriate blooming period to determine the presence or absence of the sensitive plant species Owens Valley Checkerbloom (*Sidalcea covillei*). If this species is identified within the proposed Project area and cannot be avoided, necessary permits shall be obtained before continuing with construction.*

*For sensitive wildlife species, although the biologist did not observe any sensitive wildlife species during the survey, the biologist determined that four sensitive wildlife species have the potential to occur at the site. These species are listed as the: Fisher (*Pekania pennanti*); California Condor (*Gymnogyps californianus*); Yellow-billed Cuckoo (*Coccyzus americanus*); and the Monarch Butterfly (*Danaus Plexippus*). Additionally, the biologist did not observe on or within the immediate vicinity of the project site and small mammal burrows. The biologist concluded no portions of the project footprint contain the important habitat suitability elements for any of the sensitive wildlife species and none are likely to occur and there would be no direct impacts anticipated. As a result, the biologist has recommended no further action is needed for mitigation with regard to sensitive wildlife species.*

*As for any nesting birds, the biologist determined the Project site is not located within a principal migratory bird flyway and no nests or nesting activity was observed during the survey. Although there are no trees that will be removed during construction there are trees that exist in the vicinity of the Project site that could provide suitable avian nesting habitat. As a result, pursuant to the Migratory Bird Treaty Act, construction activity should be avoided during avian nesting season between February and August. If construction activity cannot avoid this nesting season, then a qualified biologist shall perform a pre-construction clearance survey to determine the presence/absence of nesting activity onsite and within the vicinity of the Project. If no activity is observed no further*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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action is required. If nesting activity is observed, construction activity may proceed after the nestlings have fledged. However, if the facility must be installed in the vicinity of an active nest, then a biological monitor shall be present during all construction activity during which construction shall be only conducted at the discretion of the monitor to ensure there is no direct or indirect cause of a nest to fail due to construction.

During the survey, the biologist identified that a portion of the proposed utility route for the Project runs through a mapped wetland area north of the proposed Project site which could potentially be impacted by the Project. Given this potential impact, prior to construction a wetland areas and a wetland delineation shall be conducted prior to construction to mitigate any impacts.

The biological report can be found at: <https://www.inyocounty.us/services/planning-department/current-projects>

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

No, the Project is not located within an aquatic environment according to the biological report.

The biological report can be found at: <https://www.inyocounty.us/services/planning-department/current-projects>

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No, although the biological report identified that a portion of the proposed utility route for the Project runs through a mapped wetland north area of the proposed Project site, prior to construction a wetland areas survey and a wetland delineation shall be conducted to mitigate any impacts.

The biological report can be found at: <https://www.inyocounty.us/services/planning-department/current-projects>

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?

No, there is no interference with any native resident or migratory fish, or wildlife species with established native resident corridors. Nor will the Project impede the use of native wildlife nursery sites. None of the impacts were identified.

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

No, there are no local policies or ordinances protecting biological resources that pertain to the Project site.

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

No, the Project area is not subject to a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

**V. CULTURAL RESOURCES:** Would the project:

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

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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15064.5?

*No, a cultural study was conducted by Trileaf Corporation (Trileaf) on the project site on September 24, 2024 with the resulting report dated September 30, 2024. During this time the Eastern Information Center (EIC) of the California Historical Resources Information System (CHRIS) in Riverside was closed and the records were being transferred to the Southern San Joaquin Valley Information Center (SSJVIC) in Bakersfield making the records not accessible. However, Trileaf stated the California State Historic Preservation Office (CASHPO) Built Environment Resource Directory (BERD) informed them that there are zero (0) National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or National Historic Landmarks (NHL) listed properties in the Project area of Potential Effect-Direct Effects or Area of Potential Effect-Visual Effects.*

The study can be found at: <https://www.inyocounty.us/services/planning-department/current-projects>

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

*No, a cultural and archaeological study was conducted by Trileaf Corporation (Trileaf) on the project site on September 24, 2024 with the resulting report dated September 30, 2024. During this time the Eastern Information Center (EIC) of the California Historical Resources Information System (CHRIS) in Riverside was closed and the records were being transferred to the Southern San Joaquin Valley Information Center (SSJVIC) in Bakersfield making the records not accessible. However, Trileaf stated the California State Historic Preservation Office (CASHPO) Built Environment Resource Directory (BERD) informed them that there are zero (0) National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or National Historic Landmarks (NHL) listed properties in the project Area of Potential Effect-Direct Effects or Area of Potential Effect-Visual Effects. No archeological resources as defined in Section 15064.5 were found. Therefore, the Project will not cause an adverse change in the significance of an archaeological resource pursuant to Section 15064.5. In the event a concentration of artifacts or culturally modified soil deposits (including trash pits older than 50 years) are encountered at any time during construction activities, all work shall immediately stop until a qualified archaeologist views the finds and makes a preliminary evaluation. Additionally, Inyo County staff shall immediately be notified per Inyo County Code Chapter 9.52-Disturbance of Archaeological, Paleontological and Historical Features.*

The study can be found at: <https://www.inyocounty.us/services/planning-department/current-projects>

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

*No, there are no known human remains or burial sites within the Project area. Refer to the response to (V b) for the potential for archaeological resources. While unlikely, human remains are a potential archaeological resource, and will be handled similar to other archaeological resources, as outlined in (V b).*

**VI. ENERGY:** Would the project:

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

*No, the Project is a monopole telecommunications tower with antennas that use only a small amount of energy and is required to meet California building standards including green and Title 24 standards.*

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

*No, the Project is not located in one of the County's Solar Energy Development Areas (SEDA), as identified by the General Plan.*

**VII. GEOLOGY AND SOILS:** Would the project:

a) Directly or indirectly cause substantial adverse effects, including the risk of loss injury, or death involving:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No. According to the Geotechnical Engineering Investigation report section 8.1 prepared by Salem Engineering Group, Inc. (Salem) dated July 17, 2024, the Project is not within a currently established State of California Earthquake Fault zone for surface fault rupture hazards nor within an Alquist-Priolo Fault Zone, and the Project site does not include any habitable structures.

The study can be found at: <https://www.inyocounty.us/services/planning-department/current-projects>

ii) Strong seismic ground shaking?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, as discussed above (VII. a), the Project would not include any habitable structures and is not located within a fault zone. The Uniform Building Code ensures that future structures shall be constructed to required seismic standards in order to withstand such shaking, and so this potential impact is considered to have no impact.

The study can be found at: <https://www.inyocounty.us/services/planning-department/current-projects>

iii) Seismic-related ground failure, including liquefaction?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No. In the Geotechnical Engineering Investigation report conducted by Salem in section 8.4, it is concluded that based on review of the California Earthquake Hazard Zone application and the Hazzard Maps, the Project site is not located within a known liquefaction hazard zone.

The study can be found at: <https://www.inyocounty.us/services/planning-department/current-projects>

iv) Landslides?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No. The Geotechnical Engineering Investigation repor, conducted by Salem, in section 8.6 concluded there are no known landslides located at the site, nor is the site in the path of any known or potential landslides nor is there any potential for a landslide to be a hazard to this Project.

The study can be found at: <https://www.inyocounty.us/services/planning-department/current-projects>

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, minimal grading is proposed and limited to the spreading of tower spoils among the lease area and compacting the lease area and access for a suitable sub-base for gravel.

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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No. In the Geotechnical Engineering Investigation report conducte, by Salem, in section 9.1.1, it is concluded the site is suitable for the proposed construction at the site as planned.

The study can be found at: <https://www.inyocounty.us/services/planning-department/current-projects>

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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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No. In the Geotechnical Engineering Investigation report conducted by Salem, in section 9.1.3, it is concluded the near surface soils are considered to have a very low expansion potential.

The study can be found at: <https://www.invocounty.us/services/planning-department/current-projects>

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the Project will not require septic tanks or alternative wastewater disposal systems.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the Project site does not include unique paleontological or geological features.

**VIII. GREENHOUSE GAS EMISSIONS:** Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the Project is a monopole telecommunications tower that will hold cellular service antennas that will not create emissions of greenhouse gases.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the Project is a monopole telecommunications tower that will hold cellular service antennas that will not create emissions of greenhouse gases.

**IX. HAZARDS AND HAZARDOUS MATERIALS:**

**Would the project:**

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the Project is a monopole telecommunications tower that will hold cellular service antennas that does not include the 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the Project is a monopole telecommunications tower that will hold cellular service antennas that will not include the generation of hazardous materials.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the Project is a monopole telecommunications tower that will hold cellular service antennas that will not emit hazardous emissions, or handle or acutely hazardous materials, substances, or waste and it is not within one-quarter of a mile of a school.

d) Be located on a site which is included on a list of	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

*No, the Project location is not included on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.*

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project is not included in an airport land use plan or within two miles of a public airport or public use airport.*

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project is a monopole telecommunications tower that will hold cellular service antennas that will not physically interfere with an adopted emergency plan or emergency evacuation.*

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires,?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project is a monopole telecommunications tower that will hold cellular service antennas that will not expose people or structures to wildland fires.*

**X. HYDROLOGY AND WATER QUALITY:**

**Would the project:**

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project is a monopole telecommunications tower that will hold cellular service antennas that will not affect water quality standards, waste discharge requirements or groundwater quality.*

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Proposed project is a tower and wireless internet antenna that will have no effect on groundwater supplies or interfere with ground-water recharge.*

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

- i) result in a substantial erosion or siltation on- or off-site;
- ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
- iii) create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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systems or provide substantial additional sources of polluted runoff; **or**  
iv) impede or redirect flood flows?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project is not located in or near a flood hazard, tsunami or seiche zone or at risk of release of pollutants due to project inundation.*

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project is not proposed in an area that is included in a water quality control or sustainable ground water management plan.*

**XI. LAND USE AND PLANNING: Would the project:**

a) Physically divide an established community?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project is a monopole tower with cellular antenna and is being built on the edge of community in a rural and undeveloped area that will divide an established community.*

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the proposed telecommunication tower and cellular antennas are consistent with the County's General Plan and Zoning code designations of Agriculture and Open Space that both allow for public, quasi-public uses that include telecommunications towers and cellular antennas with a conditional use permit.*

**XII. MINERAL RESOURCES: Would the project:**

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, according to the State of California Department of Conservation Division of Oil, Gas, and Geothermal Resources, there are no known valuable mineral resources in the vicinity of the proposed Project.*

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project site is not delineated as a locally important mineral resource recovery site in the Inyo County General Plan. Further, no active mines or mineral prospects exist on or near the proposed Project site.*

**XIII. NOISE: Would the project result in:**

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project is for a monopole telecommunication tower that will house cellular antennas and it will not produce noise.*

b) Generation of excessive ground borne vibration or ground borne noise levels?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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*No, the Project is for a monopole telecommunication tower that will house cellular antennas and it will not produce excessive ground borne vibration or noise.*

c) For a project located within the vicinity of a private airstrip or, an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project is for a monopole that will house cellular server antennas and it will not produce additional noise nor is it in the vicinity of an airstrip.*

**XIV. POPULATION AND HOUSING:** Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the tower and cellular antennas do not include proposals for the creation of new homes or businesses, nor will it create a new road or other infrastructure opportunities.*

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the tower and antennas will not displace people or create a situation where replacement housing will be necessary.*

**XV. PUBLIC SERVICES:** Would the project:

a) 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:

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project is a monopole tower that will hold cellular service antennas and is located within the Lone Pine Rural Fire Protection District. It will not cause a high demand for additional services that could result in an overall loss in service provision.*

Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project is a monopole tower that will hold cellular service antennas and is located within the jurisdiction of the Inyo County Sheriff. It will not cause a high demand for additional services that could result in an overall loss in service provision.*

Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project is a monopole tower that will hold cellular service antennas and is located within the Lone Pine Unified School District. It will not cause a high demand for additional services that could result in an overall loss in service provision.*

Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No. No new parks will be required because of this Project.*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Other public facilities?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No. The tower and cellular service antennas will not create a need for additional public services.*

**XVI. RECREATION:** 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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project would not increase the demand for neighborhood or regional parks, or other recreational facilities in the area because it would not increase the local population.*

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project would not include any new recreational facilities, require expansion of existing recreational facilities, or have an adverse effect on the environment since it would not increase the local population.*

**XVII. TRANSPORTATION:**

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No. The tower and cellular service antennas will not conflict with plans, ordinances or policies regarding transportation and transit.*

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No. The Project will not result in an adverse change in respect to vehicle miles traveled (VMT). The Project will not significantly increase passenger vehicle traffic or commuter traffic in the region. When construction is complete, the Project will only have maintenance personnel on-site as needed and be remotely monitored 24 hours a day. The Project is not within one-half mile of either an existing major transit stop or high-quality transit corridor.*

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project will not result in any design features for transportation that increase hazards.*

d) Result in inadequate emergency access?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, the Project will be located directly adjacent to, and accessible from, Tuttle Creek Road and emergency access is and will continue to be available.*

**XVIII. TRIBAL CULTURAL RESOURCES:** Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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*No, a cultural study was conducted by Trileaf Corporation (Trileaf) on the project site on September 24, 2024 with the resulting report dated September 30, 2024. During this time the Eastern Information Center (EIC) of the California*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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*Historical Resources Information System (CHRIS) in Riverside was closed and the records were being transferred to the Southern San Joaquin Valley Information Center (SSJVIC) in Bakersfield making the records not accessible. However, Trileaf stated the California State Historic Preservation Office (CASHPO) Built Environment Resource Directory (BERD) informed them that there are zero (0) National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or National Historic Landmarks (NHL) listed properties in the project Area of Potential Effect-Direct Effects or Area of Potential Effect-Visual Effects. No cultural resources as defined in Public Resource Code section 5020.1(k) were found during the pedestrian survey of the Project site and surrounding area. Therefore, the Project will not cause an adverse change in the significance of a tribal resource as defined in Public Resources Code sections 21074 and 5020.1(k). In the event that a concentration of artifacts or culturally modified soil deposits (including trash pits older than 50 years) are encountered at any time during construction activities, all work shall immediately stop until a qualified archaeologist views the finds and makes a preliminary evaluation and Inyo County staff shall immediately be notified per Inyo County Code Chapter 9.52-Disturbance of Archaeological, Paleontological and Historical Features.*

The study can be found at: <https://www.inyocounty.us/services/planning-department/current-projects>

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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

*No, the Project area is vacant and undeveloped. It does not contain any resources based on the cultural survey conducted by Trileaf Corporation and as determined by Inyo County to be significant pursuant to criteria set forth in subdivision (c) of the Public Resource Code section 5024.1 (i.e., is associated with events that made a significant contribution to the state's cultural patterns, is associated with the lives of persons important to our past, embodies the distinctive characteristics of a type or period, or has yielded or may yield information important in prehistory or history).*

**XIX UTILITIES AND SERVICE SYSTEMS:**

**Would the project:**

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

*No, the Project is a monopole tower that will hold cellular service antennas. It will not require new or an expansion of existing water, wastewater treatment facilities, storm water drainage facilities, electric power facilities, natural gas facilities, or telecommunications facilities.*

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

*No impact, the water demand for the Project construction activities is low and would be needed during construction only. The operation of the telecommunications tower would not require use of water supplies.*

c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

*No, the proposed Project will not be serviced by a wastewater treatment facility.*

d) Generate solid waste in excess of state or local standards, or in

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

*No, limited solid waste is expected to be garnered during the Project construction activities, such as packing materials used during transport of the telecommunication tower's components. To the extent possible, construction materials would be recycled and disposed of to minimize solid waste generation by the Project and would not affect landfill capacity. Based on the available capacity of the Lone Pine Landfill, there is sufficient capacity to accommodate the limited amount of solid waste not suitable for recycling that would be generated during Project construction. The telecommunications tower will not generate solid waste for its operation.*

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

*No impact. The applicant will be required to comply with federal, state and local statues and regulations related to solid waste.*

**XX. WILDFIRE:**

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

*No, the Project will not impair any adopted emergency response or evacuation plan for the area.*

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?

*No, the Project area would be unoccupied after construction except during the time of maintenance operations. The project is physically separated from other surrounding structures. The Project does little to add to the wildfire risk in the area. Any potential risk is mitigated by compliance with the California Building Standards.*

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?

*No, the Project will not cause the need for additional wildfire infrastructure.*

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?

*No, the Project is located in an area that is mostly undeveloped and surrounded by mostly flat desert terrain.*

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE:**

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

*No, the Project has less than significant impact or potential to degrade the quality of the environment or eliminate important examples of a major period of California history or prehistory. Mitigation measures will be written into the Conditions of Approval for the Project. The limited impact to resources in the Project area can be mitigated to less than significant levels with the following mitigation measures:*

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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1. *The monopole tower shall have a low finish polish to prevent glare.*
2. *Prior to construction, a botanical survey shall be conducted during the appropriate blooming period to determine the presence or absence of sensitive plant species, specifically *Sidalcea covillei* (Owens Valley Checkerbloom). If this species is identified within the proposed project area and cannot be avoided, necessary permits shall be obtained before proceeding.*
3. *Prior to Construction, the applicant shall perform a wetlands area and wetlands delineation.*
4. *Construction activity should avoid the avian nesting season (February- August). If construction activity must occur during the nesting season, a qualified biologist shall perform a pre-construction clearance survey to determine the presence/absence of nesting activity onsite and in the vicinity of the project site. The survey shall address impacts to nesting birds per the Migratory Bird Treaty Act. If no nesting activity is observed, no further action is required. If nesting activity is observed on or in the immediate vicinity of the project site, construction activity may proceed after the nestlings have fledged. If the facility must be installed in the vicinity of an active nest, a biological monitor shall be present during all construction activities, and construction activity shall be conducted at the discretion of the monitor to ensure that it does not directly or indirectly cause a nest to fail.*

*The Project has no potential of impact on 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)?

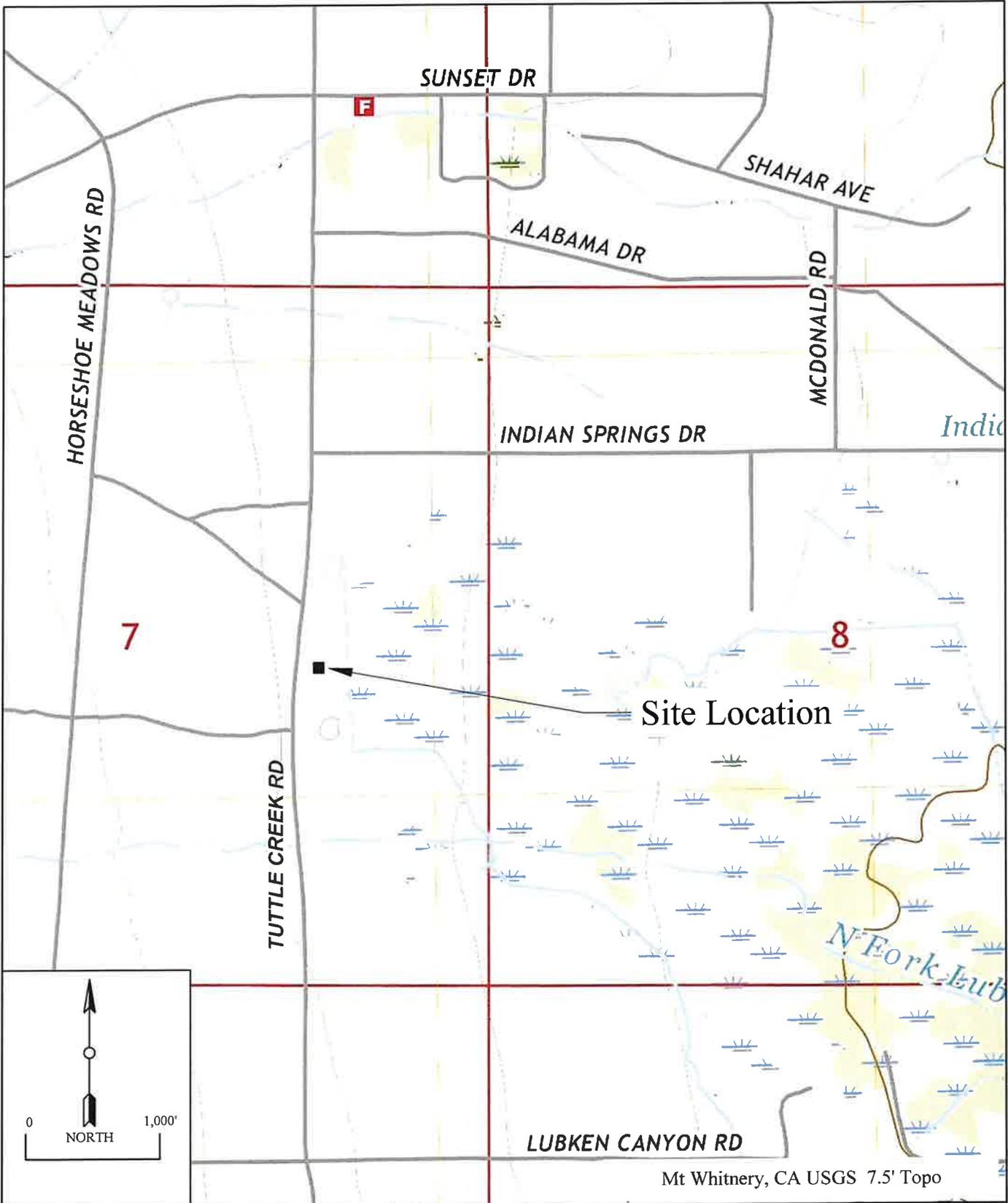
                                                                

*No, the Project does not have impacts that are individually limited but cumulatively considerable. There is no connection with this Project to past or current projects and there are no known potential future projects.*

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

*No. There have been no impacts discovered through the review of this application demonstrating that approval of the conditional use permit application and implementation of the proposed action would cause substantial adverse effects to human beings either directly or indirectly. No mitigation measures are required to reduce any potential impacts.*



Mt Whitney, CA USGS 7.5' Topo

<p><b>VICINITY MAP</b></p> <p>GEOTECHNICAL ENGINEERING INVESTIGATION          Proposed Verizon 105' Monopole Tower          1203 Lubken Canyon Road          Lone Pine, California</p>	<p>SCALE: 1" = 1,000'</p>	<p>DATE: June 14, 2024</p>	
	<p>DRAWN BY: PC</p>	<p>APPROVED BY: AD</p>	
	<p>PROJECT NO. 1-224-0478</p>	<p>FIGURE NO. 1</p>	