A

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

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

DRAFT NEGATIVE DECLARATION OF ENVIRONMENTAL IMPACT AND INITIAL STUDY

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

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

PROJECT DESCRIPTION: Tentative Parcel Map 422 would combine six parcels (033-500-03, 033-500-04, 033-500-14, 033-500-15, 033-500-16, 033-500-17) in order to develop a tent and RV camping business. The Project includes 10 tent-camping sites and 40 RV camping spots. The Project includes 4 existing homes that will be turned into cabins for rental, a star gazing area for campers to enjoy at night, a horse shoe pit, a tennis court, a bird watching area, a restaurant, and kayaking rentals for use on Olancha Lake. CEQA analysis is required in order for the Planning Commission to give final approval for the tentative parcel map. The proposed project site would create recreational opportunities, such as kayaking and wind surfing on Olancha Lake, and cover approximately 80 acres. Please note, this County action (approval of Tentative Parcel Map 422) is considered the same project, under CEQA, as two other actions currently under consideration by Inyo County, a zone reclassification/General Plan Amendment, which the applicant needs to conduct a commercial use on a property with the correct land use designation.

FINDINGS:

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

The proposed tentative parcel map requires CEQA review and approval from the Planning Commission: "Pursuant to Section 15022 of the State CEQA Guidelines, examples of projects that shall be subject to the requirements set forth in CEQA include but are not limited to:... 2. Minor subdivisions (tentative parcel maps and the creation of lots by certificate of compliance" (15.20.010).The proposed zone reclassification necessitates a change to the General Plan land use designation of Rural Estate (RE). The applicant is requesting a General Plan designation of Resort Recreational (REC). This project will require a General Plan Amendment to create zoning and land use consistency. The current designation of RE has a 5-acre per single-family home density requirement. The goal of this zone reclassification is to allow for the future use of a commercial recreational business. Section 4.2 of the Land Use Element, within the Inyo County General Plan (pg. 4-19), identifies "recreational commercial uses, such as resorts, recreational facilities...campgrounds, trailer parks, restaurants" as uses that fall within the Resort Recreational (REC) designation. This section notes that the REC designation is well suited "toward tourist use," and is therefore the best General Plan designation for the project.

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

The proposed tentative parcel map (TPM 422) is required because there are "more than four lots involved in the lot line adjustment" and therefore "a re-subdivision tentative map application [is] required" (ICC 16.52.070). The proposed zone reclassification and General Plan Amendment would alter the zoning designation from Rural Residential (RR) and Light Industrial (M2) to Commercial Recreation (C5). The C5 designation allows "hotels, [lodging], ranches, and restaurants" as principle permitted uses (ICC 18.54.020), which aligns with the proposed General Plan Amendment and would allow for the applicant's proposed land use of creating a recreational/resort business. The C5 zone includes within its purpose statement (ICC 18.54.010) that it is established for "commercially operated recreational activities, including resorts, lodges, motels, restaurants, general stores, campgrounds, mobilehome parks," specifically oriented "to the traveler and tourist." This project will bring economic growth the county and create local jobs.

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

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

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

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

Biological Resources: The applicant shall perform preconstruction nesting bird surveys & botanical surveys with blooming periods that occur outside the window of what was surveyed in July 2019.

Water Quality/Stormwater: In compliance with the Clean Water Act (CWA), the applicant shall perform preconstruction surveys to determine if the project will affect any Waters of the US, or impact jurisdictional resources administrated by the Army Corps of Engineers, State Water Resources Control Board, or the California Department of Fish & Wildlife (CDFW). If potential impacts are identified, the applicant shall secure the necessary Section 401 permit, Section 404 permit, and or 1600 Stream or Bed Alteration Agreement program permit. In addition, the applicant shall work with the Lahontan Regional Water Quality Control Board to determine if an application for a Stormwater Pollution Prevention Plan (S.W.P.P.P) permit is necessary.

The 30-day public & State agency review period for this Draft Negative Declaration will expire on May 4, 2020. 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 Steve Karamitros (760-878-0268) if you have any questions regarding this project.

S. Karamitros — 3/30/2020

Steve Karamitros — Date
Senior Planner, Inyo County Planning Department

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.

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

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

INYO COUNTY PLANNING DEPARTMENT

APPENDIX G: CEQA INITIAL STUDY & ENVIRONMENTAL CHECKLIST FORM

1. Project title: Tentative Parcel Map 422 (concurrent with Zone Reclassification 2019-02/General Plan Amendment 2019-01/Olancha Lake RV)

2. Lead agency name and address: Inyo County Planning Department, 168 N. Edwards St., P.O. Drawer L, Independence, CA 93526

3. Contact person and phone number: Steve Karamitros, Senior Planner, (760) 878-0268

4. Project location: The proposed project is located on the southern tip of the Owens Dry Lake where US 395 meets SR 190, immediately southeast of the unincorporated community of Olancha, CA and can be accessed by both US-395 & SR 190. The proposed project is to be located on 80-acres of private land owned by Olancha Lake, LLC with the Assessor's Parcel Numbers: 033-500-03, 033-500-04, 033-500-14, 033-500-15, 033-500-16, 033-500-17, 033-080-37.

5. Project sponsor's name and address: Leedy Ying (Olanch Lake, LLC), 12550 Whittier Blvd, Whittier, CA 90602.

6. General Plan designation: Residential Estate (RE)

7. Zoning: Rural Residential/Mobile Home Combined (RMH) & Light Industrial (M2)

8. Description of project: The Project's tentative parcel map depicts a property with approximately 10 tent camping site and 40 RV-camping sites. Four pre-existing structures will be converted into cabins to rent. The Project includes a kayak and surf board rental, for recreational use on the Olancha Lake, and a restaurant. Cabins are situated on the east side of the lake, RV hook-ups will be placed along the west side of the lake. The lake will be filled and reserved for swimming, kayaking, and stand up surf boarding. Three preexisting, permitted wells will supply water for domestic use and to fill the lake. The project site is located on seven, privately owned, parcels, totaling approximately 80.50 acres.

9. Surrounding land uses and setting: Briefly describe the project's surroundings:

The property is surrounded primarily by undeveloped land consisting of desert scrub. The property to the west is zoned General Industrial (M1), with commercially zoned areas generally located to the west along US 395. Properties to the north and south are also zone Rural Residential, with Open Space to the east. The closest developed area is the community Olancha, approximately 0.25-miles to the west.

Location:	Use:	Gen. Plan Designation	Zoning
West	vacant & developed private property	Rural Protection (RP); Rural Residential	General Industrial (M1); (C1); Highway Services & Tourist Commercial (C2)

		Medium Density (RRM)	
North	Vacant private property	Residential Estate (RE)	Rural Residential/Mobile Home (RR-MH)
East	Vacant private property	Rural Protection (RP)	Open Space-40 acre minimum (OS-40)
South	Vacant private property	Residential Estate (RE)	Rural Residential/Mobile Home (RR-MH)

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

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

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

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

Inyo County did not receive any requests for consultation.

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

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

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

On the basis of this initial evaluation:

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

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

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

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

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

S. Karamitros — 3/30/2020

Steve Karamitros, Senior Planner — Date
Inyo County Planning Department

INYO COUNTY PLANNING DEPARTMENT
ENVIRONMENTAL CHECKLIST FORM

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

I. AESTHETICS -- Would the project:

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

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

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

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

c) Substantially degrade the existing visual character or quality of the site and its surroundings? ☐ ☐ ☐ ☒

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

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

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

II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including 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?	☐	☐	☐	☒

No, the project does not convert prime farmland, unique farmland, or farmland of Statewide importance to non-agricultural use and is in fact, an agriculture use.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

No, there are no conflicts with zoning for agriculture nor will the project cause rezoning of Forest Land. There are no Williamson Act Contracts in Inyo County. The project is for recreational uses, in contrast to the current residential land use. No agricultural land is being affected.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

No, the proposed project site does not include forest land or timber land.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

No, the proposed project site will not affect forested land or impact any land use designated for that purpose.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

No, the proposed project site does not currently contain Farmland.

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

a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒

No, the project will be required to follow best management practices for dust control during construction-related activities.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒

No, the proposed project will be in compliance with current air quality standards.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐

No, there will be short-term construction equipment impacts from dust and exhaust emissions, but the Great Basin Unified Air Pollution Control District considers these construction emissions to be less than significant. Although there are portions of Inyo

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

County within non-attainment areas for Federal and State PM10 (particulate matter 10 microns or less in diameter) ambient air quality standards, the primary source for this pollution is the Owens dry lake, located approximately one mile north of the project site. The temporary nature of the construction and best practices for dust control and emissions being followed during construction will cause the project to be less than significant.

d) Expose sensitive receptors to substantial pollutant concentrations? ☐ ☐ ☐ ☒

No, existing sensitive receptors consist of a few scattered residences with the closest roughly 1,000-feet to the west. There are no hospitals or other non-residence sensitive receptors in the area. The business will offer camping sites, with additional creational uses on an artificial lake, neither of which will produce air pollutants. The business operation is in a rural area where traffic volumes from guests to the project site will be negligible.

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

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

IV. BIOLOGICAL RESOURCES: Would the project:

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

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

On July 23, 2019, the consultants surveyed the project site action area for the presence of special status botanical and wildlife species. This entailed a comprehensive north-south transect pattern, with parallel transects traversed along a north-south axis. The survey identified 34 plant species, of which four were invasive/non-native and one was classified as native and rare in California, Polemoniaceae (Eriastrum sparsiflorum), commonly known as the Great Basin Wollystar. CNPS' Calscape database classifies Eriastrum sparsiflorum, commonly known as the Great Basin Wollystar, as rare. This annual plant in the phlox family grows in Great Basin of the western United States and blooms from May-September. Plants with blooming seasons prior to or after the reconnaissance surveys, conducted on July 23, 2019, may not appear in the survey results. The Project site has potential to support special-status species and non-sensitive species generally protected by federal and state laws. In addition, trappings of special-status animals, such as Mohave ground squirrel (whose range does fall within the Project footprint), were not conducted for this report. It is strongly advised that CDFW protocols are followed, for botanical & wildlife species, to determine the presence/absence of State-listed species. Preconstruction biological surveys and bird-nesting surveys are advised to be performed to confirm absence.

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? ☐ ☐ ☒ ☐

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

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

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? ☐ ☐ ☐ ☒

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

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? ☐ ☐ ☒ ☐

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

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

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

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

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

V. CULTURAL RESOURCES: Would the project:

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

A "historical resource" is a resource listed, or determined to be eligible for listing, in the California Register of Historical Resources (Title 14 CCR §15064.5(a)(1)-(3)). Historical resources may include, but are not limited to, "any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC §5020.1(j)). To initiate the Project site investigation, a cultural resources records search was conducted through the California Historic Resources Information System (CHRIS) at the Eastern Information Center (EIC) housed at the University of California, Riverside. The archival and digital materials were obtained from the EIC on July 30, 2019. The records search queried the CHRIS database for previously documented cultural resource sites and surveys within the Tribal-mandated one-mile buffer of the Project footprint. The search included a review of all recorded prehistoric/historic archaeological resources, built-environment resources, and the following directories: The California Points of Historical Interest (CPHI), California Historical Landmarks (CHL), California Register of Historical Resources (CALREG), National Register of Historic Places (NRHP), and California State Historic Properties Directory (CHPD). None of the 98 cultural resource sites identified occur within the Project footprint.

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

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

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

An additional parcel (033-080-37) was added to the Project scope following the August 2019 record search and surveys. This parcel shall be analyzed prior to the start of construction to guarantee that no Historical and or Archaeological resources are impacted. Should any archaeological or cultural resource be discovered on the site during any future development, work shall immediately desist and Inyo County staff immediately be notified per Chapter 9.52, Disturbance of Archaeological, Paleontological and Historical Features of the Inyo County Code. Therefore, future development, though beyond the scope of this project, can be conducted so as to not cause an adverse change in the significance of an archaeological resource if one is discovered, pursuant to Section 15064.5

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ☐ ☐ ☐ ☒

The Project is located in Eastern California in the unincorporated town of Olancha, CA on the southern tip of the Owens Dry Lake where Highway 395 meets Highway 190. Olancha has an elevation of 3,658 feet and is situated east of the Sierra Nevada Mountains, part of the Great Basin environmental and geomorphic province. The Great Basin contains a basin and range landform pattern and a topography consisting of north-south trending mountain ranges separated by fault-bounded valleys. Soils in the Project area are primarily Typic Psammaquents with small amounts of Playa and Arizo-Yellowrock complex. The likelihood of finding subsurface paleontological resources in Inyo County, in this southeast section, is not well known. The land consists of mostly flat-lying sediments, thus natural erosion cuts through the sediments but does not penetrate deeply except in major stream channels, so the prior existence of subsurface and at-depth fossils is not readily available. The proposed project property has no known paleontological resources, so the proposed project will not directly or indirectly destroy a unique paleontological resource.

d) Disturb any human remains, including those interred outside of dedicated cemeteries? ☐ ☐ ☐ ☒

No known human remains or burial sites are on the property. Refer to the response to V b) for the potential for archaeological resources. While unlikely, human remains are a potential archaeological resource, and will be handled similar to other archaeological resources. If human remains are encountered during the undertaking, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of the origin and disposition of the remains pursuant to Public Resources Code Section 5097.98. The County Coroner must also be notified immediately of the find. If the remains are determined to be of prehistoric or protohistoric Native American origin, the Coroner will notify the Native American Heritage Commission (NAHC). The NAHC shall determine and notify a Most Likely Descendant (MLD) individual or group that will consult with a qualified archaeologist and recommend the manner of treatment for any human remains and associated burial offerings. With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC

VI. GEOLOGY AND SOILS: Would the project:

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

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to ☐ ☐ ☐ ☒

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

Division of Mines and Geology Special Publication 42.

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

ii) Strong seismic ground shaking? ☐ ☐ ☐ ☒

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

iii) Seismic-related ground failure, including liquefaction? ☐ ☐ ☐ ☒

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

iv) Landslides? ☐ ☐ ☐ ☒

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

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

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

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? ☐ ☐ ☐ ☒

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

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

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

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

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

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

VII. GREENHOUSE GAS EMISSIONS:
Would the project:

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

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

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

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

VIII. HAZARDS AND HAZARDOUS MATERIALS:
Would the project:

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

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

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? ☐ ☐ ☐ ☒

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

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

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

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? ☐ ☐ ☐ ☒

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

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

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

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

No, the proposed project will not physically interfere with an adopted emergency 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?	☐	☐	☐	☒

No, risk of loss, injury and death involving wildland fires is minimal from this project. Fire risks are low to moderate at the project site, and no areas in proximity can be considered urbanized. Land surrounding the project site is sparsely vegetated with a desert scrub community of many native subsistence seed-bearing plants, predominantly, rabbitbrush. Units for residential use (cabins, campers, the caretaker home) will have access to 2 emergency exit roads. The proposed project does little to add to the wildfire risk in the area. The risk of loss, injury or death involving wildland fires is less than significant at this site, and any potential risk is further reduced by compliance with Inyo County & California Building Standards.

IX. HYDROLOGY AND WATER QUALITY: Would the project:

a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐

No, the project will not violate any water quality standards or waste discharge requirements. The applicant will coordinate with Inyo County's Environmental Health Department, the Inyo County Building and Safety Department, as well as the Regional Water Quality Board, to determine what is required in terms of the NPDES/SWPPP process (waste discharge requirements for the project), based on regulatory criteria and site characteristics (soils, slopes, etc.). Prior to project initiation, the applicant shall comply with the following regulations and their jurisdictional agencies: a Clean Water Act (CWA) Section 404 Permit, from the Army Corps of Engineers; a Section 401 Permit from the State Water Resources Control Board; a 1602 Permit from California Department of Fish & Game. In the event that these permits are required, the applicant shall incorporate the above named permits into their project design. No effects to public or environmental health are expected from this project.

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)?	☐	☐	☒	☐

Ground water pumping will occur at the facility using pre-existing wells, and water use will be focused primarily in filling and maintaining the Olancha Lake. Water will also be made available to tent and RV campers. Filling the lake will require roughly 10 acre feet.

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?	☐	☐	☐	☒

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

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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 which would result in flooding on or off-site?	☐	☐	☐	☒

No, potential impacts related to flood hazards for the area are less than significant, based on the fact that no mapped FEMA 100-year floodplains are located within the vicinity of the proposed project location, also any water that might runoff of the project site would end up in the Haiwee reservoir.

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒

No, the project is not anticipated to generate substantial additional surface flows. Impacts related to capacity of existing or planned storm drain systems are expected to be less than significant. Pre-and post-development runoff rates and related effects to storm drain systems will be evaluated during the construction design phase of the project and drainage plans based on regulatory requirements and best management practices will be required from the applicant during the construction of the project to the satisfaction of the Inyo County Public Works and Building a Safety Departments.

f) Otherwise substantially degrade water quality?	☐	☐	☐	☒

No, there are no potential impacts to water quality. A septic system will be required for the site and the applicant will work with Inyo County's Environmental Health Department to minimize any potential impacts to 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?	☐	☐	☐	☒

No, the proposed project is not in a 100-year flood hazard area.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒

No, the project is not in a 100-year flood hazard area.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒

No, the proposed project site is not in an area subject to flooding due to the failure of a levee or dam. Average annual rainfall in this area is 6-inches.

j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

No, the proposed project site is not in an area subject to seiches, tsunamis, or mudflows.

X. LAND USE AND PLANNING: Would the project:

a) Physically divide an established community?	☐	☐	☐	☒

No, the proposed project does not 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?	☐	☐	☐	☒

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

No, the applicant is requesting a zone reclassification, in order to create a commercial RV-tent-camping business, which is required by the County's zoning code. The project site is currently zoned Rural Residential & the applicant is requesting a zone change to Commercial Recreation, and a General Plan amendment to Resort Recreational. These changes & amendments will allow a Project that conforms to the proper local land use designation.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan? ☐ ☐ ☐ ☒

No, the proposed project will not conflict with any habitat conservation plan or natural community conservation plan.

XI. 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? ☐ ☐ ☐ ☒

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

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

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

XII. NOISE: Would the project result in the:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? ☐ ☐ ☐ ☒

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

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? ☐ ☐ ☐ ☒

No, exposure to noise levels will be primarily airborne, and groundborne vibrations if any would be brief.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? ☐ ☐ ☐ ☒

No, noise levels will be minimal due to the nature of the project. Ambient noise will not exceed the noise already present in the vicinity from US-395 or from the bridge-building warehouse and materials site. Noise from maintenance will be minimal and infrequent.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? ☐ ☐ ☐ ☒

No, noise levels at their maximum, created by the proposed project, will not substantively increase the noise levels already found in the vicinity caused by US-395. The noise will come primarily from camping vehicles entering and exiting the site.

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 expose people residing or working in the project ☐ ☐ ☐ ☒

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

area to excessive noise levels?

No, the proposed project is not located within an airport land use plan, or within 2-miles of a public airport.

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? ☐ ☐ ☐ ☒

No, the proposed project is not within the vicinity of a private airstrip.

XIII. 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)? ☐ ☐ ☐ ☒

The Project is expected to employ county residents from the Lone Pine area. The proposed camping and recreation Project will likely employ 5-6 people for maintenance and care of the Olancha Lake property. Given the lack of residential infrastructure and services (including a lack of emergency services and utilities) the Project will not be induce residential growth in the Olancha area.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? ☐ ☐ ☐ ☒

No, the proposed project will not displace existing housing or create a situation where replacement housing will be necessary. It is in an area of very sparse residential development.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? ☐ ☐ ☐ ☒

No, the proposed project will not displace people, or create a situation where replacement housing will be necessary. It is in an area of very sparse residential development.

XIV. 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? ☐ ☐ ☐ ☒

No new fire protection services will be required because of this project.

Police protection? ☐ ☐ ☐ ☒

No new police protection services will be required because of this project.

Schools? ☐ ☐ ☐ ☒

No new school service will be required because of this project.

Parks? ☐ ☐ ☐ ☒

No new parks will be required because of this project.

Other public facilities? ☐ ☐ ☐ ☒

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

No, the proposed project will not create a need for additional public services.

XV. 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?	☐	☐	☐	☒

No, the proposed project will not increase the use of existing recreational facilities; rather, it will create new recreational facilities.

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?	☐	☐	☐	☒

No, the proposed project does not include, nor will it cause, a need for an increase in parks or other recreational facilities that might have an adverse physical effect on the environment.

XVI. TRANSPORTATION/TRAFFIC -- Would the project:

a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☐	☒

No, the proposed project will not cause a significant increase the existing traffic load. The Project is adjacent to US-395 and will be accessed from a dirt road that connects to the Highway. Visitor and staff vehicles entering and exiting the project will not put undue burden the existing transportation facilities. Any traffic increase would be minimal when compared with the overall use of US-395, which provides a connector between Inyo County and southern California and north to Washington State. The applicant is currently working with the Department of Transportation (Caltrans, District 9)to obtain any necessary encroachment permits that might be required for access to the site via US 395 & SR 190.

b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒

No, the LOS on the county's roads should not be affected individually or cumulatively by the proposed project. The proposed project will not result in an increase in traffic that would impact the level of service for either US-395 SR 190.

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?	☐	☐	☐	☒

No, the proposed project will not result in changes to air traffic patterns or increased traffic that could result 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)?	☐	☐	☐	☒

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

e) Result in inadequate emergency access?	☐	☐	☐	☒

No, proof of access for emergency vehicles will be required as part of the project design.

f) Result in inadequate parking capacity?	☐	☐	☐	☒

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

Inyo County Code's Commercial Recreation (C5) zoning designation requires one parking space per 300 ft^2 of "usable public floor space for all permitted and conditional uses." There will be designated employee parking as well as areas for tent-camping recreators entering the Project site.

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	☒

No, the proposed project will not significantly increase traffic, and therefore, will not affect public transit, bicycle, or pedestrian facilities. Because of the extremely remote nature of the project location, few alternative transportation opportunities exist, but those that do would be unchanged by this project.

XVII. TRIBAL CULTURAL RESOURCES -- Would the project:

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

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

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

b) 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.	☐	☐	☐	☒

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

XVIII UTILITIES AND SERVICE SYSTEMS --
Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒

No, the proposed project will be built in conformity to the standards set by the Inyo County Department of Environmental Health, as well as the Lahontan Regional Water Quality Control Board.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause	☐	☐	☐	☒

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

significant environmental effects?

The proposed project will not generate any non-domestic and no on-site wastewater treatment is necessary, nor will there be a need to construct new or expanded water or wastewater treatment facilities.

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? ☐ ☐ ☐ ☒

No, the proposed project will not require new or expanded storm water drainage facilities.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? ☐ ☐ ☒ ☐

All necessary water for the project will be pumped on site. The proposed RV and tent-camping Project will not result in a need for new entitlements of water resources. Current principle permitted uses for the project site, under the County's "Rural Residential" designation, include not only a primary and secondary dwelling unit, but also, "orchards, vegetable and field crops, nurseries and gardens" (ICC section 18.21.020). Other potential land uses foregone include country clubs, swimming pools and golf courses, all of which have high water budgets.

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ☐ ☐ ☐ ☒

The Project will not place undue burdens on the wastewater treatment provider. Wastewater disposal will likely utilize a septic system that will be reviewed and approved by the Inyo County Environmental Health Department.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? ☐ ☐ ☐ ☒

The proposed project will not create a need for additional solid waste capacity. Solid waste will be collected and recycled by a commercial waste hauler & septic systems will be maintained, and waste hauled off-site, by a commercial septic company. Impacts from the Project will be minimal and consistent with the existing transfer station system.

g) Comply with federal, state, and local statutes and regulations related to solid waste? ☐ ☐ ☐ ☒

The Project will comply with Inyo County's solid waste standards, as required by the Inyo County Department of Environmental Health.

XVII. 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 will not impact or degrade the quality of the environment. Project design will limit any impacts to resources to less than significant. Avoidance and minimization measures will be written into the Conditions of Approval for the Project resulting from this zone reclassification and General Plan Amendment in the following ways: (1) in compliance with the Clean Water Act (CWA), the applicant shall perform preconstruction surveys to determine if the project will affect any Waters of the US, or impact jurisdictional resources administrated by the Army Corps of Engineers, State Water Resources Control Board, or the California Department of Fish

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

& Wildlife (CDFW). If potential impacts are identified, the applicant shall coordinate with the above mentioned agencies to secure the necessary Section 401 permit, Section 404 permit, and or 1600 Stream or Bed Alteration Agreement program permit; the applicant shall follow CDFW protocols for special status animals, including Mohave Ground Squirrel, to confirm their absence; the applicant shall perform preconstruction nesting bird surveys & botanical surveys with blooming periods that occur outside the window of what was surveyed in July 2019; the applicant shall work with the Lahontan Regional Water Quality Control Board to determine if an application for a Stormwater Pollution Prevention Plan (S.W.P.P.P) permit is necessary, and (2) the applicant shall perform all of the above mentioned biological studies, as well as cultural and archaeological analyses, for the parcel that was added to the project on October 30, 2019 (APN: 033-080-37), which occurred subsequent to the studies completed for the original six parcels, in September 2019.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? ☐ ☐ ☒ ☐

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

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

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