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NEGATIVE DECLARATION OF ENVIRONMENTAL IMPACT AND INITIAL STUDY

PROJECT TITLE: Inyo County 2009 Housing Element Update

PROJECT LOCATION: Countywide

PROJECT DESCRIPTION: The General Plan Housing Element is required pursuant to California Government Code Section 65580 et seq., and works to provide housing for all of Inyo County's residents. The State is required to identify a regional housing needs assessment for the County; 567 units have been allocated for the planning period, including 457 units in unincorporated areas. The Update incorporates this requirement, new demographic information, and other revised regulations. Policy changes proposed include the following: allowing flexibility for locating residential care facilities; incorporating reasonable accommodation provisions to provide a means for persons with disabilities to request exceptions to zoning and building regulations; allowing second units ministerially in all residential zones; allowing both supportive and transitional housing types in all residential zones; and allowing for permanent emergency shelters as a permitted use in at least one zone.

FINDINGS:

An Initial Study and Evaluation of Potential Impacts has been prepared by the Planning Department (attached). Staff finds that the proposed project will **NOT** have a significant adverse impact on the environment for the following reasons:

- A. The proposed project is consistent with goals and objectives of the Inyo County General Plan.
- B. The proposed project is consistent with the provisions of the Inyo County Zoning Ordinance.
- C. Potential adverse environmental impacts will not 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.

The 30-day review period for this Negative Declaration expires on **July 17, 2009**. 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 Joshua Hart at (760) 878-0263 or by email at jhart@inyocounty.us if you have any questions regarding this project.


Mike Conklin
Director, Inyo County Planning Department

6/17/09
Date



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1. **Project title:** Inyo County 2009 Housing Element Update
2. **Lead agency name and address:** Inyo County Planning Department
168 North Edwards Street
P.O. Drawer L
Independence, CA 93526
3. **Contact person and phone number:** Joshua Hart Senior Planner; (760) 878-0447.
4. **Project location:** Countywide
5. **Project sponsor's name and address:** Inyo County Planning Department
168 North Edwards Street
P.O. Drawer L
Independence, CA 93526
6. **General Plan designation:** N/A
7. **Zoning:** N/A
8. **Description of project:** As follows:

INTRODUCTION

This document is an Initial Study and Negative Declaration (ND) prepared pursuant to the California Environmental Quality Act (CEQA), for the 2009 Inyo County Housing Element (referred to as the "2009 Housing Element" or the "proposed Housing Element"). This ND has been prepared in accordance with CEQA, Public Resources Code Sections 21000 et seq., the State CEQA Guidelines, and the County's CEQA Procedures (Inyo County Code Title 15). The draft Housing Element is available for review on the County's website at the following address: <http://inyoplanning.org/documents/HousingElement-draft.pdf>.

An Initial Study is conducted by a lead agency to determine if a project may have a significant effect on the environment. In accordance with the CEQA Guidelines, Section 15064, an environmental impact report (EIR) must be prepared if the Initial Study indicates that the proposed project under review may have a potentially significant impact on the environment. A negative declaration may be prepared instead, if the lead agency prepares a written statement describing the reasons why a proposed project would not have a significant effect on the environment and, therefore, why it would not require the preparation of an EIR (CEQA

Guidelines Section 15371). According to CEQA Guidelines Section 15070, a negative declaration shall be prepared for a project subject to CEQA when either:

- a) The Initial Study shows there is no substantial evidence, in light of the whole record before the agency, that the proposed project may have a significant effect on the environment, or
- b) The Initial Study identified potentially significant effects, but:
 - (1) Revisions in the project plans or proposals made by or agreed to by the applicant before the proposed negative declaration is released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
 - (2) There is no substantial evidence, in light of the whole record before the agency, that the proposed project as revised may have a significant effect on the environment.

If revisions are adopted into the proposed project in accordance with the CEQA Guidelines Section 15070(b), a mitigated negative declaration (MND) is prepared.

LEAD AGENCY

The lead agency is the public agency with primary responsibility over a proposed project. In accordance with CEQA Guidelines Section 15051(b)(1), "the lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose." Based on these criteria, Inyo County will serve as lead agency for the 2009 Housing Element.

DESCRIPTION OF THE 2009 HOUSING ELEMENT

The Draft Inyo County 2009 Housing Element is designed to address the projected housing needs of current and future County residents and to comply with state law requiring amendment of the Housing Element by August 31, 2009 (Section 65580–65589.8 of the Government Code). The 2009 Housing Element is the County's policy document guiding the provision of housing to meet future needs for all economic segments of Inyo County, including housing affordable to lower-income households. The 2009 Housing Element identifies the policies and programs which the County will implement to ensure that housing in Inyo County is affordable, safe, and decent. It addresses housing needs by encouraging the provision of an adequate quantity of sites designated for multi-family housing, by assisting in affordable housing development, and through the preservation and maintenance of existing affordable housing stock.

Amendment of the Housing Element is subject to CEQA. No specific development projects are proposed as part of the 2009 Housing Element. However, the 2009 Housing Element does propose changes in existing land use densities and land use regulations. These proposed changes include the following:

- The amendment of the Zoning Code to allow permanent emergency shelters as a permitted use by right in a yet-to-be-determined County zoning district. Senate Bill (SB) 2, requires jurisdictions to allow for permanent emergency shelters as a permitted use in at least one zone, which may be residential, commercial, or industrial, but must be appropriate for this type of use and not be completely built out. In accordance with SB 2, the County will evaluate the most appropriate zone to permit shelters and amend the Zoning Code accordingly within one year of adoption of the Housing Element.

- The amendment of the Zoning Code to define transitional and supportive housing and explicitly allow both supportive and transitional housing types in all residential zones.
- The amendment of the Zoning Code to allow single-room occupancy units (SROs) in developed areas near services and transit.
- The provision of updated density bonus incentives to encourage development of housing for low-income households.
- The amendment of the Zoning Code to allow second units with ministerial review in all residential zones.
- The amendment of the Zoning Code to allow flexibility for the location of residential care facilities by permitting facilities for six or fewer persons by right in all residential zones.

The 2009 Housing Element provides policies to encourage the development of affordable housing consistent with current General Plan policies. Zoning Code changes associated with implementation of the 2009 Housing Element would be minor and mainly proposed to update the Zoning Code to existing State requirements, with which the County currently complies.

Regional Housing Need

California's Department of Housing and Community Development (HCD) has identified a projected housing need for Inyo County of 567 units for the period covering January 2007 to June 30, 2014. The Regional Housing Needs Assessment (RHNA) for unincorporated portions of the County has been determined to be 457 units in the following income categories:

- 116 Very Low,
- 70 Low,
- 83 Moderate, and
- 188 Above Moderate.

GOALS OF THE 2009 HOUSING ELEMENT

The 2009 Housing Element contains the following goals:

- Goal 1.0: To maintain the existing housing stock and eliminate substandard housing conditions in Inyo County.
- Goal 2.0: To provide adequate sites for residential development.
- Goal 3.0: Encourage the adequate provision of housing by location, type of unit, and price to meet the existing and future needs of Inyo County residents.
- Goal 4.0: Provide increased opportunities for homeownership.
- Goal 5.0: Remove governmental constraints on housing development.
- Goal 6.0: Promote equal opportunity for all residents to reside in housing of their choice.

Under each Housing Element Goal are the guiding policies and programs (implementation actions) associated with each goal that will be implemented during the 2009–2014 Housing Element period to accomplish the goal. Detailed descriptions of each guiding policy and program, as well as specific time frames, responsibility for programs, and funding sources, are provided in the County’s Draft 2009 Housing Element.

ENVIRONMENTAL SETTING AND SURROUNDING LAND USES

The environmental setting consists of the areas located within the unincorporated regions of Inyo County. Inyo County hosts over 50 small communities and one incorporated city, Bishop. The community of Independence, located near the center of the Owens Valley, is the County seat. Highway 395 provides the primary north-south transportation link through the County with other highways providing connections to Death Valley and southeastern Inyo County.

Inyo County is the second largest county in California, with a total land area of approximately 10,140 square miles or about 6.5 million acres. But even though the County contains a large land area, the amount of land held in private ownership is very small—1.9 percent. A range of federal agencies (91.6 percent), the State of California (3.5 percent), the Los Angeles Department of Water and Power (LADWP) (2.7 percent), and the County/other local agencies/Indian reservation lands (0.3 percent) make up the remaining 98.1 percent.

OTHER APPROVALS REQUIRED

There are no other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement) for the proposed Housing Element. The State Department of Housing and Community Development reviews and certifies Housing Elements; however, its approval is not required for adoption by the County.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

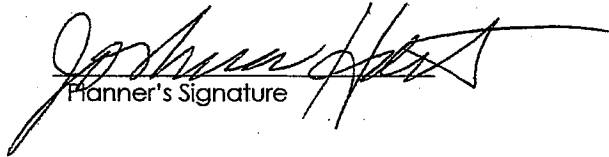
The environmental factors checked below would be potentially affected by the 2009 Housing Element, as indicated by the checklist and corresponding discussion on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <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/Traffic |
| <input type="checkbox"/> Utilities/Service Systems | <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.


Planner's Signature

6/18/09
Date

Joshua Hart
Planner's Printed Name

Inyo County
Planning Department

ENVIRONMENTAL CHECKLIST AND EVALUATION

Evaluation of Environmental Impacts

- 1) A "No Impact" answer is adequately supported if the information shows 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 project-specific screening analysis).
- 2) All answers must take into account the whole action involved, including offsite as well as onsite, 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, 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 "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) 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 significant.

Environmental Checklist

I. AESTHETICS		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

Inyo County’s natural resources are the prime contributor to the scenic and visual environment within the County. Creeks and rivers, Owens Lake, mountain ranges and valleys, expansive ranches and agriculture areas, volcanic outcrops and cones, and Death Valley National Park (to name a few) each provide unique visual experiences within the County. Additionally, each community within the County is visually interesting in its local setting and on a regional basis due to its individually well-defined characteristics that makes it stand out from the surrounding environment. View corridors are also abundant throughout the County from numerous permanent locations, as well as along scenic roadways that residents and visitors experience while traveling through the County. The County contains three officially designated state scenic highway segments, two designated National Forest Scenic Byways, 63 miles of Bureau of Land Management (BLM) National Scenic Byways, and 82 miles of BLM Backcountry Byways.

Discussion/Conclusion:

a) *Less Than Significant Impact.* The Inyo County General Plan does not identify any scenic vistas within the County Planning Area. The 2009 Housing Element would not adversely affect a scenic vista. Implementation of the Housing Element would potentially lead to an increase in residential density within the County. However, implementation of the 2009 Housing Element would not allow for development beyond that identified in the County’s General Plan, as all proposed adjustments to the County’s Zoning Ordinance would be consistent with the General Plan. The 2009 Housing Element would not adversely affect any scenic vista. Therefore, this impact is considered to be less than significant.

b-c) *Less Than Significant Impact.* The proposed Housing Element is a policy-level document. While the Housing Element encourages the provision of a range of housing types and affordability levels, it does not include any specific designs or proposals, nor does it grant any entitlements for development that would degrade the existing visual character of the

County. The Housing Element anticipates land uses that are consistent with the land use designations established by the General Plan. Future residential development projects will require compliance with the General Plan Conservation/Open Space Element policies related to visual resources and Zoning Ordinance requirements associated with planning and development regulations (Chapter 18.78). The strategies contained within the General Plan relative to urban design, community and neighborhood identity, as well as residential and commercial project design, would ensure physical, visual, and functional compatibility between residential and other uses, as well as encourage high-quality development.

Implementation of the proposed Housing Element would result in less than significant impacts associated with the degradation of the visual character of the County.

d) Less than Significant Impact. As discussed under **b-c)** above the proposed Housing Element is a policy-level document that does not include any specific development designs or proposals, nor does it grant any entitlements for development that would increase daytime glare or nighttime illumination in the County. Future residential development projects within the County would be required to be designed and constructed in accordance with the General Plan and the County Subdivision Ordinance (Title 16) requirements associated with planning and development regulations. For instance, General Plan Policy VIS-1.6 states that 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. Where public safety would not be compromised, the County encourages the use of low-pressure sodium lighting for all outdoor light fixtures.

Furthermore, light and glare impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, implementation of the proposed Housing Element would result in less than significant impacts associated with increased light and glare.

II. AGRICULTURAL 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.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

Agriculture is important to Inyo County’s culture and heritage, as well as to its economy. Due to the extensive rangelands available for grazing, the primary agriculture activity in the County is livestock production, consisting of raising cattle, pack animals (horses, mules, and burros for transporting people and supplies), and sheep. A small amount of intensive agriculture occurs, and irrigated pasturelands are also present within the County.

The California Department of Conservation has instituted the Farmland Mapping and Monitoring Program to provide the information needed to assess the value of highly productive and economically important farmland. Due to budget constraints and the lack of published soil surveys, potentially important farmlands in Inyo County have not been identified. No Williamson Act contracts exist within the County.

Discussion/Conclusion:

a-b) Less Than Significant Impact. Future development consistent with housing needs identified for the County will result in development of vacant land. However, this development will not impact Farmland or Williamson Act contracts as none exist within the County. The proposed Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels. It does not include any specific development designs or proposals, nor does it grant any entitlements for development that would convert agricultural lands to non-agricultural uses or place housing units adjacent to agricultural uses. The Housing

Element anticipates land uses that are consistent with the land use designations established by the General Plan Diagrams.

The Housing Element does identify the need to amend the Zoning Ordinance in order to revise the density bonus to encourage construction of affordable housing units as well as to allow emergency shelters in a yet-to-be-determined zoning district and transitional and supportive housing as permitted uses in all residential zoning districts. While these Housing Element programs do identify the need to increase density, the specific areas of affected lands have not yet been determined. Housing Element policies and programs do not provide specific details regarding future land use decisions, and no course of action associated with these policies has been determined. Therefore, identification of environmental impacts associated with this program, including consideration of whether or not it would conflict with or convert existing agricultural uses, would be speculative.

Furthermore, future residential development projects would require compliance with General Plan policies related to agricultural resources that are intended to preserve blocks of agricultural land in agricultural or open space use and maintain a continuing agricultural use of those lands. Policy AG-1.2 of the County General Plan supports and encourages continued agricultural production activities in the County, while AG-1.3 discourages conversion of productive agricultural lands for urban development. Policy AG-1.4 seeks to preserve and protect agricultural lands from encroachment by incompatible land uses.

Therefore, impacts associated with the conversion of agricultural lands to nonagricultural uses, as well as impacts associated with conflicts with agricultural zoning and Williamson Act lands, would be considered less than significant.

c) *Less Than Significant Impact.* The placement of nonagricultural uses adjacent to agricultural uses can result in agriculture-urban interface conflicts that inadvertently place growth pressure on agricultural lands to convert to urban uses. These conflicts include inconveniences or discomforts associated with dust, smoke, noise, and odor from agricultural operations, restrictions on agricultural operations (such as pesticide application) along interfaces with urban uses, farm equipment and vehicles using roadways, and trespassing and vandalism on active farms. The proposed Housing Element does not identify specific development. Although the Housing Element does identify the need for increased density as well as change some land use regulations, the project does not involve the construction or expansion of residential development. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal.

Therefore, impacts associated with changes in the existing environment which, due to their location or nature, could result in conversion of farmland to nonagricultural use would be considered less than significant.

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:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in significant construction-related air quality impacts?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

Air quality is a major issue affecting Inyo County. The Great Basin Unified Air Pollution Control District (GBUAPCD) is responsible for developing air quality plans, monitoring air quality, and reporting air quality data for the Great Basin Air Basin. GBUAPCD works with other regional and local governments to reduce air pollutant emissions through regulation of the various sources.

The largest stationary source of air pollution in Inyo County is wind-raised dust from the dry Owens Lake bed. The once large but shallow lake has been left dry by historic and current diversions of water from the Owens Valley by the Los Angeles Department of Water and Power (LADWP). Currently, the wind erosion of the Owens Lake bed accounts for 99 percent of the emission inventories in Inyo County and is the single largest source of PM₁₀ (particulate matter) in the nation (Inyo County, 2002). Concentrations of PM₁₀ greatly exceed current federal and state standards. In fact, measurements in the past have been known to exceed air quality standards by over 25 times. In addition to the obvious health impacts, this dust also reduces visibility in the area, which impacts the scenic beauty of this area, tourism, and military operations at China Lake Naval Weapons Station.

The U.S. Environmental Protection Agency (USEPA) had designated the Owens Lake area as a serious PM₁₀ nonattainment area and set forth requirements for the State of California, and ultimately for GBUAPCD, to prepare and submit a Demonstration of Attainment State Implementation Plan.

The 2008 State Implementation Plan (2008 SIP) has been prepared by GBUAPCD in response to a finding by USEPA that the Owens Valley Planning Area did not attain the 24-hour National Ambient Air Quality Standard (NAAQS) for PM₁₀ by December 31, 2006, as mandated by the Clean Air Act Amendments of 1990 (CAAA). This document includes an analysis of the particulate matter air pollution problem in the Owens Valley and provides a revised control strategy to bring the area into attainment with the federal air quality standard for particulate matter, as soon as practicable by achieving at least a 5 percent reduction in PM₁₀ emissions per year. The 2008 SIP must demonstrate that the NAAQS can be attained by March 23, 2012, unless USEPA grants an extension which could make the deadline March 23, 2017. The 2008 SIP also incorporates provisions of the 2006 Settlement Agreement between GBUAPCD and LADWP to expand dust control measures to additional areas at Owens Lake in order to attain the NAAQS as soon as practicable.

Discussion/Conclusion

a) *Less Than Significant Impact.* A project would conflict with or obstruct implementation of the regional air quality attainment plans (Demonstration of Attainment State Implementation Plan/2008 SIP) if it is inconsistent with the growth assumptions, in terms of population, employment, or regional growth in vehicle miles traveled. These population forecasts are developed, in part, on data obtained from local jurisdictions and projected land uses and population projections identified in community plans. Projects that result in an increase in population growth that is inconsistent with local community plans would be considered inconsistent with the 2008 SIP.

Certain policies in the Housing Element propose changes to existing densities, as well as changes to land use regulations. However, those policies do not include any specific development designs or proposals, nor do they grant any entitlements for development. The proposed Housing Element does not identify specific development. Although the Housing Element does, for example, identify the need to allow emergency shelters as permitted uses in a yet-to-be-determined County zoning district as well as the need to amend the Zoning Ordinance to allow single-room occupancy units in developed areas near services and transit, the project does not involve the construction or expansion of residential development. All future development would be required to be in accordance with local regulations, including the General Plan and Zoning Ordinance. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Furthermore, future residential development projects will require compliance with General Plan policies and implementation measures related to air quality, including policies and measures intended to reduce the consumption of fossil fuels and the use of private motor vehicles (Public Safety Element Policy AQ-1.2 and associated Implementation Measure 3.0). Therefore, impacts associated with obstructing implementation of the regional air quality attainment plan would be less than significant.

b-d) *Less Than Significant Impact.* All ambient air quality standards, except national standards for PM₁₀ in the Owens Valley and Coso Junction regions of the County and the state standards for ozone and PM₁₀ throughout Inyo County, are met. In addition, the daily federal and state ambient standards of ozone and PM₁₀ are sometimes exceeded (CARB, 2009). Future development of housing units facilitated by the proposed Housing Element could result in an

minor local increase in criteria pollutants during both construction and operational activities and could also slightly contribute to the existing nonattainment status of GBUAPCD. Construction activities such as excavation and grading operations, construction vehicle traffic, and wind blowing over exposed earth could generate exhaust emissions and fugitive particulate matter emissions that could affect local air quality to a small degree. This is variable depending on the weather, soil conditions, and the amount of activity taking place, as well as the effectiveness of required dust control efforts. Likewise, operational air quality impacts are dependent on the types of land uses and mitigation being used, but are expected to be negligible.

The proposed Housing Element does not include any specific development designs or development proposals, nor does it grant any entitlements for development. Certain policies in the Housing Element propose changes to existing land use densities and land use regulations. All future development would be required to be in accordance with local regulations, including the General Plan and County Code. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Furthermore, future residential development projects will require compliance with General Plan policies related to air quality (Public Safety Element Policies AQ-1.1 through AQ-1.5 and associated implementation measures).

The proposed Housing Element would have less than significant impacts associated with contributing substantially to an existing or projected air quality violation and increasing criteria pollutants during both construction and operational activities.

e) *Less Than Significant Impact.* Housing units facilitated by the proposed Housing Element would be considered sensitive receptors that could be exposed to pollutant concentrations. However, as discussed under **a)** and **b-d)** above, the proposed Housing Element does not include any specific development designs or development proposals, nor does it grant any entitlements for development. Future residential development would be required to comply with General Plan policies related to air quality, conform to the Demonstration of Attainment State Implementation Plan/2008 SIP, and meet NAAQS and GBUAPCD thresholds during both construction and operational activities. Therefore, the proposed Housing Element would have less than significant impacts associated with exposing sensitive receptors to pollutant concentrations.

f) *No Impact.* Residential developments are not considered to be an emission source that would result in objectionable odors. No impact would occur.

IV. BIOLOGICAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

Biologically, Inyo County can be divided into four major eco-provinces: the eastern Sierra Nevada, the Owens Valley, the White-Inyo Mountains, and the Mojave Desert. The geology, climate, flora, and fauna of these regions intermingle, creating a rich and interesting array of biological communities. Rapid transitions in elevation—in places spanning from 3,000 feet to 14,000 feet above sea level in less than 10 aerial miles—produce dramatic variations in

temperature and rainfall (Inyo County, 2002). These ranges in topography and precipitation are responsible for much of the region's biological diversity.

Inyo County is home to the largest population of tule elk in California. Although the species is not native to the County, a herd was introduced in 1933 and the population has grown considerably. Today, four distinct herds of tule elk roam the County. Critical calving areas and summer and winter ranges have been established and are monitored. The County also supports herds of bighorn sheep, federally listed as endangered, and free-roaming burros and horses, which are recognized as wildlife in Inyo County.

Of the 95 special-status plant species currently known to occur or having potential to occur in Inyo County, 3 are federally listed as endangered, 3 are federally listed as threatened, and 29 are federal species of concern. Three of these plants are also listed as endangered and six are listed as threatened by the State of California (Inyo County, 2002). Of the 64 special-status wildlife species currently known to occur or having potential to occur in Inyo County, 6 are federally listed as endangered, 7 are federally listed as threatened, and 24 are federal species of concern. Eleven of these wildlife species are also listed as endangered, 9 are listed as threatened, and 33 are considered species of special concern by the State of California (Inyo County, 2002).

Discussion/Conclusion:

a) *Less Than Significant Impact.* Future residential development projects consistent with the 2009 Housing Element could affect biological resources. Site-specific field studies are generally required to search for special-status species and to determine whether suitable habitat for any special-status species occurs on or near a study area. The proposed Housing Element is a policy-level document. While it encourages the provision of a range of housing types and affordability levels, it does not include any specific development designs or development proposals, nor does it grant any entitlements for development. Although the Housing Element does propose changes to existing densities and land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be required to be in accordance with local regulations, including General Plan Conservation/Open Space Element Policies BIO-1.1 through BIO-1.6 and associated Implementation Measures 1.0 through 12.0. These policies and implementation measures seek to maintain and enhance biological diversity and healthy ecosystems throughout the County. For example, Biological Resources Implementation Measure 2.0 states that project sites that have the potential to contain species of local or regional concern, sensitive natural communities, or special-status species shall be required to have the site surveyed and mapped by a qualified biologist and a report on the findings of the survey shall be submitted to the County as part of the application and environmental review process.

Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Compliance with General Plan goals, policies, and implementation measures and other local, State, and federal regulations will work to minimize impacts to biological resources. Therefore, adverse impacts to special-status plant and animal species, as well as their habitats, are expected to be less than significant.

b-c) *Less than Significant Impact.* Future residential development within the County could affect sensitive natural communities such as riparian habitat and federally protected wetlands. As discussed under **a)** above, the proposed Housing Element does not include any specific development designs or development proposals, nor does it grant any entitlements for

development. While the 2009 Housing Element does propose changes to existing land use densities and land use regulations, future residential development projects will be required to comply with the federal Clean Water Act (CWA) Section 404, which regulates the discharge of dredged and fill materials into waters of the United States. Waters of the United States refers to oceans, bays, rivers, streams, lakes, ponds, and wetlands. Development applicants must obtain a permit from the U.S. Army Corps of Engineers (USACE) for all discharges of dredged or fill material into waters of the United States, including wetlands, before proceeding with a proposed activity. Permits are also required for specified activities within jurisdictional State waters. Furthermore, future residential development projects will be required to comply with General Plan Conservation/Open Space Element Policies WR-2.1 and BIO-1.2 as well as Biological Resource Implementation Measures 3.0 and 4.0, which address riparian and wetland resources.

Therefore, adverse impacts to federally protected wetlands and riparian resources would be less than significant.

d) *Less than Significant Impact.* As discussed under **a)** above, the proposed Housing Element is a policy-level document and while it proposes changes to existing land use densities and land use regulations, it does not include any site-specific designs or development proposals, nor does it grant any entitlements for development. The potential for the proposed Housing Element to impede native resident or migratory wildlife corridors or the uses of wildlife nursery sites cannot be determined, as no specific details regarding future land use development are provided. Although additional impacts are not expected to result from the implementation of future individual residential projects within the areas of the County affected by the Housing Element's proposed regulatory changes, review would be required of these future proposals and would identify and if necessary provide mitigation for any impacts to native wildlife corridors and nursery sites. Therefore, impacts would be less than significant.

e) *No Impact.* As discussed under **a-d)** above, the proposed Housing Element does not include any specific development proposals, nor does it grant any entitlements for development that would affect biological resources. Therefore, the proposed Housing Element would not conflict with any local policies or ordinances protecting biological resources.

f) *Less Than Significant Impact.* The 9.4-million-acre West Mojave Habitat Conservation Plan encompasses most of California's western Mojave Desert. It extends from Olancho in Inyo County on the north to the San Gabriel and San Bernardino mountains on the south, and from the Antelope Valley on the west to the Mojave National Preserve on the east. About one-third of the West Mojave Habitat Conservation Plan is private land, another third is within military bases, and the final third consists of public lands managed by the federal Bureau of Land Management (BLM). The goal of the West Mojave Habitat Conservation Plan is to conserve and protect the desert tortoise and nearly 100 other sensitive plants and animals, as well as the ecosystems on which they depend. At the same time, the Plan provides developers of public and private projects with a streamlined program for compliance with the California and federal endangered species acts that regulates consistently, reduces delays and expenses, eliminates uncertainty, and applies the costs of compensation and mitigation equitably to all agencies and parties.

As discussed under **a-e)** above, the proposed Housing Element does not include any specific development proposals, nor does it grant any entitlements for development that would affect biological resources. Therefore, the proposed Housing Element would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or

other approved local, regional, or state habitat conservation plan. This impact is considered to be less than significant.

V. CULTURAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

The County is rich in cultural resources due to its long history of human habitation. These resources can demonstrate the diversity of the groups that have contributed to the development of the region, including Native American and early Euroamerican influences.

Native American habitation likely began in the Lake Mojave Period (9,000-6,000 years Before Present). Artifacts from this time suggest portions of Inyo County were occupied only occasionally and not every year. A review of the artifacts recovered indicates that the culture was oriented toward the use of animal resources. Later periods saw the further development of the use of resources, establishment of defined settlement areas, and eventual establishment of irrigated wild plants. Ethnographically, two groups primarily inhabited Inyo County: the Owens Valley Paiute and the Panamint (Koso) Shoshone. The Owens Valley Paiute occupied the Owens Valley and the surrounding uplands, and the Panamint Shoshone inhabited southern Inyo County.

The first Euroamerican explorers to the Inyo County region were reportedly fur trappers. Although there had been many earlier expeditions, the first recorded expedition is that of Joseph Reddeford Walker in 1834, who entered the Owens Valley while leading the Chiles emigrant party into California. Settlement in Inyo County was driven by exploration and development of mineral resources, including gold, silver, borax, tungsten, and soda ash. As mining developed outside the County, demands for supplies brought cattle ranching to the Owens Valley.

Inyo County was organized in 1866 from land that had been set aside from Mono and Tulare counties. The County was originally named Coso County, with Independence designated as the County seat.

Discussion/Conclusion:

a-d) Less than Significant Impact. Future residential development within the County could conflict with existing known cultural and historical resources. In addition to “known” resource areas, there is the potential that there are undiscovered paleontological and archeological resources that would be encountered and potentially impacted by future construction activities. These resources could include human remains located outside of cemeteries. The Housing Element is a policy-level document. While the Housing Element encourages the provision of a range of housing types and affordability levels, it does not include any specific development designs or proposals, nor does it grant any entitlements for development that would adversely affect archaeological, paleontological, or historic resources. While the Housing Element does propose changes to existing land use densities and land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be required to be in accordance with local regulations, including the General Plan Conservation/Open Space Element. Policy CUL-1.4 requires assessment of development proposals for potential impacts to significant cultural resources. Pursuant to Section 15064.5 of the CEQA Guidelines a study conducted by a professional archaeologist may be required for projects with identified archaeological sites to determine if significant archaeological resources are potentially present and if the project will significantly impact the resources. If significant impacts are identified, the development project is required to be modified to avoid the impacts or to mitigate the impacts.

Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal.

Therefore, impacts to cultural resources, including archaeological, paleontological, and historic resources, as well as human remains, are considered less than significant.

VI. GEOLOGY AND SOILS	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

Inyo County is characterized by extremes in topographic features. High mountain ranges, formed during tectonic mountain-building episodes, contrast with deep intervening valleys. These ranges, known as fault-block ranges, were formed when large blocks of earth bounded by faults in the Earth’s crust were uplifted during periods of tectonic activity. Valleys were formed between these ranges as a result of the relative downward movement of the valley floor, combined with the uplift of the surrounding mountains (Inyo County, 2002).

The geologic forces that helped shape Inyo County are also responsible for the numerous faults traversing the valleys and mountain ranges. Extensive fault systems run along the bases of mountain ranges and throughout the ranges themselves. Fault zones extending several miles underlie the lengths of the Owens Valley, Death Valley, and Panamint Valley. The Sierra Nevada, White-Inyo, and Panamint ranges contain localized networks of faults, many of which have been active in the recent geologic past. These faults can result in hazards such as liquefaction, ground shaking, landslides, and unstable soils.

Given the size and diversity (bedrock types, water flows, organic mater, and so forth) of the County, soils in the County are equally diverse. To date, no comprehensive countywide soil survey has been prepared.

Volcanic activity is also known to currently occur in locations throughout the County. Fields of volcanic activity can be found in the Coso Mountains, the Saline and Aberdeen Volcanic Fields, Ubehebe Crater, the Green Water Range, and the Bishop Tuff. Although these areas are active, none of them are known to pose a significant hazard. More likely to affect the area is an eruption of the Long Valley Caldera in Mono County.

The steep mountain ranges in Inyo County, combined with extreme and rapidly changing weather conditions, can contribute to severe snow avalanche danger in portions of the County. Most of the avalanche-prone areas are uninhabited and undevelopable lands in the Sierra Nevada range. However, there are some developed areas or areas that are currently designated for residential uses that are located within hazard zones, such as portions of Aspendale, Habegger's, and Sage Flat.

Discussion/Conclusion:

a)

i-iii) *Less Than Significant Impact.* The Housing Element includes policies and programs designed to facilitate the construction and conservation of housing which could increase exposure of people and structures to seismic hazards, including rupture of a fault, strong seismic shaking, and seismic-related ground failure. However, the Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels rather than identifying any specific designs or development proposals. While the Housing Element does propose changes to land use densities and regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be required to be in accordance with local and state regulations, including the General Plan, Zoning Ordinance, and Alquist-Priolo Earthquake Fault Zoning Act. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal.

In addition, future residential development projects would be required to comply with the General Plan Public Safety Element. For instance, Policy GEO-1.1 restricts development of inhabitable structures in areas that are subject to severe geologic hazards, such as Alquist-Priolo Special Studies Zone, liquefaction zones, landslide areas, and seismically induced unstable soils, while Policy GEO-1.4 requires that new development of habitable structures that are located within potential seismic hazard zones provide appropriate engineering design strategies to comply with appropriate building standards. Conservation/Open Space Element Policy S-2.3 states that in areas of unstable soils and/or steep terrain, the County shall limit the intensity of development in order to minimize the potential for landform instability. In addition, all future residential developments would be required to conform to Uniform Building Code (UBC)

requirements that are intended to be sufficient to prevent significant damage from ground shaking during seismic events.

Therefore, impacts related to seismic hazards would be considered less than significant.

iv) *Less Than Significant Impact.* Landslides are most likely on hillsides where rock strata parallels surface slopes, high clay content absorbs excess water, displacement has fractured a fault zone, or the base of a slope has been removed by erosion or people. As previously mentioned, the steep mountain ranges in Inyo County, combined with extreme and rapidly changing weather conditions, can contribute to severe snow avalanche danger in portions of the County. Public Safety Element Policy GEO-1.5 restricts development on steep slopes (defined as slopes greater than 30 percent). Policy AVL-1.1 discourages new development in areas of known or potential avalanche hazard, while Policy AVL-1.4 requires structural protections for new buildings in an avalanche hazard zone or area otherwise identified as being at risk of avalanche damage.

Therefore, impacts associated with landslides are considered to be less than significant.

b) *Less Than Significant Impact.* Future construction within the County would result in the moving and grading of topsoil, which would lead to disturbed soils that are more likely to suffer from erosion from a variety of sources, such as wind and water. As discussed under **a) i-iii)** above, the proposed Housing Element is a policy-level document that does not propose any specific development and does not directly result in adverse impacts associated with substantial loss of topsoil or erosion. Any future residential developments would be subject to General Plan Conservation/Open Space Element Soil Implementation Measure 3.0, which states that the County shall require erosion control measures for all grading activities to minimize the impact of soil erosion from water and wind.

Since the proposed Housing Element does not involve the construction or expansion of any residential land uses, identification of environmental impacts associated with specific future developments or policies would be speculative at this time. Therefore, erosion impacts resulting from the proposed Housing Element would be less than significant.

c-d) *Less Than Significant Impact.* Future residential development on unstable or expansive soils could create substantial risks to life or property and result in adverse impacts such as on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. As discussed under **a) i-iii)** above, the proposed Housing Element is a policy-level document that does not propose any specific development. While the Housing Element does propose changes to land use densities and changes to land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be required to be in accordance with local regulations, including Conservation/Open Space Element Policy S-2.3, which states that in areas of unstable soils and/or steep terrain, the County shall limit the intensity of development in order to minimize the potential for landform instability. Public Safety Element Policy GEO-1.5 restricts development on steep slopes (defined as slopes greater than 30 percent), and Policy GEO-1.4 requires that new development of habitable structures that are located within potential seismic hazard zones provide appropriate engineering design strategies to comply with appropriate building standards.

In addition, environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, impacts resulting from the proposed Housing Element associated with unstable and/or expansive soils would be less than significant.

e) *Less Than Significant Impact.* The Housing Element includes policies and programs designed to facilitate the construction and conservation of housing. As discussed under **a) i-iii)** above, the proposed Housing Element is a policy-level document that does not propose any specific development. While the Housing Element does propose changes to land use densities and changes to land use regulations, it does not involve the construction or expansion of any residential land uses. Connection to, or development of, wastewater disposal systems acceptable to the Inyo County Environmental Health Services Department is mandatory for new development. These requirements may be satisfied by the development of, respectively, an individual well or an individual septic system if approved by the Inyo County Environmental Health Services Department. Policy PSU-4.1 states that the County shall limit the expansion of unincorporated, urban density communities to areas where community wastewater treatment facilities can be provided, and Policy PSU-4.4 states that the County shall permit individual on-site sewage disposal systems on parcels that have the area, soils, and other characteristics that permit installation of such disposal facilities without threatening surface water or groundwater quality or posing any other health hazards and where community sewer service is not available and cannot be feasibly provided. This impact is considered to be less than significant.

VII. HAZARDS AND HAZARDOUS MATERIALS	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. According to California Health and Safety Code Section 25501(o), "Hazardous material" means any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment. Searches of the Department of Toxic Substance Control's EnviroStor database (DTSC, 2009) and the State Water Resources Control Board Geotracker database (SWRCB, 2009) identified no hazardous material sites in Inyo County that are associated with a hazardous material related release or occurrence.

Inyo County has seven public airports (located near the communities of Bishop, Furnace Creek, Independence, Lone Pine, Stovepipe Wells, Trona, and Shoshone) and six private airstrips within its boundaries. Overall, passenger activity has increased by about 5 percent annually since 1980.

Discussion/Conclusion:

a-d) *Less Than Significant Impact.* Although unlikely, future development of residential housing units consistent with the Housing Element could create a significant hazard to future residents through exposure to the routine transport, use, or disposal of hazardous materials, through exposure to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, through exposure from the handling or emission of hazardous materials, or by locating residential development on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, impacts associated with hazardous materials would be dependent on the location of future residential development and the nature of surrounding land uses. The proposed Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels, but does not include any specific development designs or development proposals, or grant any entitlements for development.

The Inyo County Department of Environmental Health Services, which is the Certified Unified Program Agency (CUPA) for the County, issues permits to and conducts inspections of businesses that use, store, or handle quantities of hazardous materials and/or waste greater than or equal to 55 gallons, 500 pounds, or 200 cubic feet of a compressed gas at any time. The Inyo County Department of Environmental Health Services also implements the Hazardous Material Management Plans (Business Plans) that include an inventory of hazardous materials used, handled, or stored at any business in the County.

Additionally, residential developments do not generally include the routine transportation, use, or disposal of hazardous materials that could create a significant hazard to the public. Therefore, the proposed Housing Element would not create a significant hazard to the public or the environment regarding the transport, storage, use, and disposal of hazardous materials.

e-f) *Less Than Significant Impact.* Airport-related hazards are generally associated with aircraft accidents, particularly during takeoffs and landings. Airport operation hazards include incompatible land uses, power transmission lines, wildlife hazards (e.g., bird strikes), and tall structures that penetrate the imaginary surfaces surrounding an airport. As discussed under **a-d)** above, the proposed Housing Element is a policy-level document that does not propose any specific development. While the proposed Housing Element does identify the need for increased

density, it does not provide specific details regarding specific future development. Therefore impacts resulting from the proposed Housing Element associated with airport-related hazards would have a less than significant impact.

g) Less Than Significant Impact. As discussed under **a-d)** above, the proposed Housing Element is a policy-level document that does not propose any specific development. While the Housing Element does propose changes to existing land use densities and land use regulations, it does not involve the construction or expansion of any residential uses. All future residential development occurring within the County would be required to be in accordance with local regulations, including the General Plan and County Code. Individual residences constructed throughout the planning period are not expected to substantially impede or interfere with the County's emergency response or evacuation plans. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, impacts resulting from inconsistencies with adopted emergency response plans would be less than significant.

h) Less Than Significant Impact. Wildfires are a major public safety problem in Inyo County. The vast open space and combustible vegetation, combined with extreme seasonal weather conditions of low humidity and high winds, create the perfect recipe for severe wildfires that burn hot, fast, and out of control. Additionally, fire hazards are exacerbated by wooden structures located on forested lots. Lightning and human negligence are the primary causes of wildfire in the County. Public Safety Element Policy WF-1.2 discourages development within high fire hazard severity zones, while Policy WF-1.3 requires fuel modification for structures within fire hazard zones. Most new residential development is anticipated in the vicinity of existing development in areas with enhanced fire protection services and reduced wildfire hazard risk. Wildfire Hazard Implementation Measure 4.0 states that during review of development proposals, the County shall require appropriate building setbacks and fuel modification requirements within fire hazard zones.

As discussed under **a-d)** above, the proposed Housing Element is a policy-level document that does not propose any specific development. While the proposed Housing Element does identify the need for increased density, it does not provide specific details regarding specific future development. Therefore this impact is considered to be less than significant.

VIII. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

VIII. HYDROLOGY AND WATER QUALITY

Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

Although most areas of the County can be defined as a desert based on annual rainfall totals, some parts of the County are rich in water resources. Wetlands are defined in Section 404 of the Clean Water Act as “areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support (and do support, under normal circumstances) a prevalence of vegetation typically adapted for life in saturated soil conditions” (33 CFR 328.3[b], 40 CFR 230.3). Areas that fit this definition fall under the jurisdiction of USACE. To be protected under Section 404 of the Clean Water Act, a wetland must support positive indicators for hydrophytic vegetation, hydric soil, and wetland hydrology. However, agencies other than USACE may consider an area a wetland if it is lacking one or more of the three parameters set forth by USACE but provides important wetland functions and values such as wildlife habitat and water quality maintenance.

The term “other waters of the United States” refers to seasonal or perennial water bodies, including lakes, stream channels, drainages, ponds, and other surface water features that exhibit an ordinary high-water mark but lack positive indicators for one or more of the three wetland parameters described above (33 CFR 328.4). These water bodies are often also protected by USACE or other agencies because of their important ecological function and values.

Three types of landforms in Inyo County are commonly subject to flooding: stream floodplains, alluvial fan/bajadas, and playas or dry lakes. Additionally, residents of Lone Pine and Olancha have expressed concern that the Los Angeles Aqueduct might fail and result in flooding hazards. These hazards can be exacerbated when development occurs within these floodplains or hazard zones, causing additional runoff, modification of floodplains, and public safety risks. New development in the future will also impact flood zones to some extent by increasing impervious surfaces and runoff. High rainfall or snow melt can also lead to hazards such as mudflows and the downstream movement of larger debris flows, such as rocks, trees, and other large debris.

According to the California State Department of Water Resources (DWR, 2004), there are as many as 38 groundwater basins underlying Inyo County. The Owens Valley Groundwater Basin, for example, underlies Benton, Hammil, and Chalfant valleys in Mono County and Round and Owens valleys in Inyo County. This basin is bounded by non-water-bearing rocks of the Benton Range on the north, of the Coso Range on the south, of the Sierra Nevada on the west, and of the White and Inyo mountains on the east (DWR, 2004). This system of valleys is drained by several creeks to the Owens River, which flows southward into the Owens (dry) Lake, a closed drainage depression in the southern part of the Owens Valley. Groundwater levels in parts of this basin were depressed near Bishop and Independence during the late 1920s to 1930s because of heavy pumping (DWR, 2004). Water levels rebounded and remained fairly steady through the

early 1960s. A series of wet years between 1982 and 1986 and relatively low groundwater pumping resulted in generally high water tables, followed by six years of heavy groundwater pumping resulting in water level declines. During the 1990s, there was less pumping and water tables rose (DWR, 2004).

Discussion/Conclusion:

a) and f) *Less than Significant Impact.* Future residential development within the County could result in both construction and operational impacts to water quality and discharge standards. Potential operational impacts include the use of fertilizers, herbicides, and pesticides to maintain lawns, as well as motor vehicle operation and maintenance. Potential construction impacts include grading and vegetation removal activities that would result in the exposure of raw soil materials to the natural elements (wind, rain, etc.). However, the purpose of the proposed Housing Element is to identify the policies and programs which the County will implement to ensure that housing in Inyo County is affordable, safe, and decent. The proposed Housing Element is a policy-level document that does not include any specific design or development proposals, nor does it grant any entitlements for development. Therefore, identification and analysis of water quality impacts associated with the proposed Housing Element would be speculative at this time. While the Housing Element does propose changes to existing land use densities and changes to land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be required to be in accordance with local regulations, including the General Plan Conservation/Open Space Element Policies WR-1.4, WR-3.1, and WR-3.2 and Water Resources Implementation Measures 4.0, 8.0, 14.0, and 16.0). Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal.

In addition, all new development projects in the County are subject to the requirements of the National Pollution Discharge Elimination System (NPDES) Stormwater Permit Number CA0103225 enforced by the Regional Water Quality Control Board (RWQCB). The permit requires that the County impose water quality and watershed protection measures for all development projects and prohibits discharges from causing violations of applicable water quality standards or from resulting in conditions that create a nuisance or water quality impairment in receiving waters.

Therefore, water quality and waste discharge impacts would be less than significant.

b) *Less than Significant Impact.* Inyo County currently operates community water systems located in Laws, Independence, and Lone Pine. In other parts of the County, community service districts or private systems provide domestic water. The water system used in each community in the County is described in the community descriptions contained in Chapter 2 of the County General Plan.

In addition and as discussed under **a) and f)** above, the proposed Housing Element does not identify any specific development or grant any entitlements for development. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, impacts would be less than significant.

c-e) *Less than Significant Impact.* The proposed Housing Element encourages the development of a range of housing types at varying affordability levels within Inyo County. If development of housing units were to occur in previously undeveloped areas without measures to minimize stormwater flows, increased impervious surfaces and grading and vegetation

removal activities could increase surface runoff and could therefore increase flows to existing stormwater drainage systems and increase the potential for localized flooding and/or erosion. However, the proposed Housing Element is a policy-level document that does not include any specific designs or development proposals, nor does it grant any entitlements for development. While the Housing Element does propose changes to existing land use densities and changes to land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be required to be in accordance with local regulations, including the General Plan and County Code. Standard plan review will ensure that stormwater flows are minimized and that drainage facilities are adequately sized to avoid on- or off-site flooding. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal.

Future residential development projects in the County are subject to the requirements of NPDES Stormwater Permit Number CA0103225 enforced by RWQCB. The permit requires that the County impose water quality and watershed protection measures for all development projects and prohibits discharges from causing violations of applicable water quality standards or from resulting in conditions that create a nuisance or water quality impairment in receiving waters. Compliance with the provisions of the NPDES would reduce the impacts of future development. Therefore, the proposed Housing Element would not result in significant impacts to drainage or runoff as no development is proposed and future development envisioned by the Housing Element would be subject to the regulations discussed above.

g-h) Less than Significant Impact. Portions of the County are located within the FEMA-designated 100-year flood zone. However, as discussed under ***a-f)*** above, the proposed Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development. Future development projects would be subject to General Plan policies that regulate land uses in flood-prone areas and allow development in those areas only with appropriate mitigation (Public Safety Element Policies FLD-1.1, FLD-1.2, and FLD-1.5 through FLD-1.7, as well as Flood Hazard Implementation Measures 1.0 through 3.0 and 8.0 through 10.0). Therefore, standard plan review procedures will ensure that any structures built within a 100-year flood zone incorporate appropriate measures to ensure less than significant impacts.

i) No Impact. In California, the Department of Water Resources, Division of Dam Safety is responsible for ensuring that all dams must satisfy stringent design criteria covering all possible conditions that could affect the dam, including earthquakes and flood events, without considering probability factors. Therefore, dams are designed to withstand the largest and strongest earthquake that could conceivably affect them. Similarly, dams are required to withstand the largest possible flood that could occur, which is referred to as the maximum probable flood. Since the Housing Element would not otherwise affect the structural integrity of an existing dam's structure or substantially add to the risk of dam failure, no impact is expected to occur.

j) No Impact. Inyo County is not located near any ocean, coast, or seiche hazard areas and therefore would not expose people or structures to inundation by seiche, tsunami, or mudflow. No impact would occur.

IX. LAND USE AND PLANNING	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

Inyo County is the second largest county in California, with a total land area of approximately 10,140 square miles or about 6.5 million acres. But even though the County contains a large land area, the amount of land held in private ownership is very small—only 1.9 percent. A range of federal agencies (91.6 percent), the State of California (3.5 percent), LADWP (2.7 percent), and the County/other local agencies/Indian reservation lands (0.3 percent) make up the remaining 98.1 percent.

Within the County a wide range of planning documents are currently used to guide land use decisions. Private, County, and LADWP lands fall under the guidance of the County’s General Plan. For federal lands, each of the major land management agencies has an adopted management plan. Major agencies involved in the County include the National Park Service (Death Valley National Park), Bureau of Land Management, U.S. Forest Service (USFS), and U.S. Department of Defense (China Lake Naval Weapons Center).

Given the limited amounts of private land available within the County, the transferring of land from agency management to private ownership can have a sizable impact on the County. In addition to LADWP land transfers proposed near several Owens Valley communities, other large land transfers are being considered in the County.

Discussion/Conclusion:

a–b) Less Than Significant Impact. The Housing Element is consistent with the land uses envisioned in the General Plan and would not remove policies that currently protect environmental resources. The Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels. The proposed Housing Element does not include any specific development proposals, nor does it grant any entitlements for development. The Housing Element anticipates land uses that are consistent with the land use designations established by the General Plan Land Use Element. Future residential development projects will require compliance with General Plan policies related to land use and Zoning Ordinance requirements associated with zoning districts, allowable uses, and development

standards. While the Housing Element does propose changes to existing land use densities and land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be required to be in accordance with local regulations, including the General Plan and County Code. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, land use impacts would be less than significant.

c) *Less Than Significant Impact.* The 9.4 million-acre West Mojave Habitat Conservation Plan encompasses most of California's western Mojave Desert. It extends from Olancho in Inyo County on the north to the San Gabriel and San Bernardino mountains on the south, and from the Antelope Valley on the west to the Mojave National Preserve on the east. About one-third of the West Mojave Habitat Conservation Plan is private land, another third is within military bases, and the final third consists of public lands managed by the federal Bureau of Land Management. The goal of the West Mojave Habitat Conservation Plan is to conserve and protect the desert tortoise and nearly 100 other sensitive plants and animals, as well as the ecosystems on which they depend. At the same time, the Plan provides developers of public and private projects with a streamlined program for compliance with the California and federal endangered species acts that regulates consistently, reduces delays and expenses, eliminates uncertainty, and applies the costs of compensation and mitigation equitably to all agencies and parties.

As discussed under **a-b)** above, the proposed Housing Element does not include any specific development proposals, nor does it grant any entitlements for development that would affect biological resources. Therefore, the proposed Housing Element would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. This impact is considered to be less than significant.

X. MINERAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

The presence of mineral resources was a driving force for much of the early settlement within the County. Although approximately 60 percent of the land in the County is thought to have mineral potential, mining currently plays a significant, although decreasing, role in the County. The predominant mining activity is the extraction of aggregate resources (stone, sand, gravel, and clays). Other valuable minerals, such as silver and gold, are also mined throughout the County. Borates and soda ash (from Owens Lake) also play an important role in the mining industry.

The potential for development and enhancement of energy resources in Inyo County is somewhat limited. Several hydroelectric and geothermal power plants are currently in operation, producing as much as 322 megawatts (MW) of electricity per day.

Discussion/Conclusion:

a-b) Less Than Significant Impact. Future residential development within the County is not expected to result in loss of available known mineral resources since residential development is expected in relatively small areas that do not accommodate large amounts of unique mineral resources. The proposed Housing Element is a policy-level document that does not propose any specific development. While the Housing Element does propose changes to land use densities and changes to land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be required to be in accordance with local regulations, including Conservation/Open Space Element Policy MER-1.5, which seeks to ensure that extractive resource areas are protected from incompatible development that could interfere with extractive operations. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, this impact is less than significant.

XI. NOISE	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

Certain areas of the County can experience noise levels that can be a concern to local residents and visitors. Potential noise areas include areas adjacent to highways and roadways that experience high traffic volumes, near large mining or industrial facilities, near local airport facilities, and areas exposed to overflight by military aircraft.

Noise effects may differ depending upon who is exposed to the noise. Some sensitive receptors, such as residential areas, hospitals, convalescent homes and facilities, schools, and other similar uses, are affected to a greater degree by noise impacts. Regardless of the source, noise can be a nuisance effect that can adversely impact humans and wildlife resources.

Seven public access airports and six private airstrips are located throughout the County. To date, noise studies of these airports have not been performed; however, these airports are not considered a significant contributor to current noise levels within the surrounding communities given their locations and current use levels. Conversely, flyovers from China Lake Naval Air Weapons Station and other nearby installations do create significant noise impacts in the County. In addition to aircraft associated with the China Lake facility, aircraft associated with

other military installations, including Fort Irwin, Nellis Air Force Base, George Air Force Base, March Air Force Reserve Base, and Edwards Air Force Base, use the station's designated airspace or use other designated flight training routes in the County.

Discussion/Conclusion:

a-d) *Less Than Significant Impact.* The proposed Housing Element encourages the provision of a range of housing types and affordability levels. Housing is not considered a major source of noise in the County, but placing housing adjacent to major sources of noise could expose people to temporary or permanent noise levels in excess of standards established in the County General Plan. However, the Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development. Future residential development projects will require compliance with General Plan policies and implementation measures related to noise and vibration standards (Public Safety Element Policies NOI-1.1 through NOI-2.3 and Implementation Measures 1.0 through 11.0). While the Housing Element does propose changes to existing land use densities and land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be required to be in accordance with local regulations, including the General Plan and County Code. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, adverse impacts related to a temporary or permanent increase in noise levels would be less than significant.

e-f) *Less than Significant Impact.* As discussed under **a-d)** above, the proposed Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development that would expose people to excessive noise levels. Future development projects would be subject to the General Plan regarding noise sources. Therefore, impacts would be less than significant.

XII. POPULATION AND HOUSING	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

In the 1960s, Inyo County experienced a 4 percent growth rate as the County gained popularity as a destination for recreation activities and retirement. This was the largest population boom in Inyo County since the early 1900s. In the 1970s, the County saw continued but more limited growth. Population growth slowed in the 1980s, when it increased by only 244 people. Most of this population growth was the result of in-migration of older persons of retirement or near-retirement age.

The 2000 Census showed unincorporated Inyo County as one of the few California jurisdictions that lost population. In the ten-year period from 1990 to 2000, Inyo County's population declined by 390 individuals. In the eight years since the decennial census, the population of the County has increased at an average annual rate of 0.2 percent, adding an additional 185 persons.

According to the Department of Finance (DOF) information, the total population of Inyo County in 2008 was 18,152, and 80.4 percent of the total County population resided in unincorporated areas, while the balance (19.6 percent) resided in the City of Bishop.

Discussion/Conclusion:

a) *Less Than Significant Impact.* The proposed Housing Element contains housing goals intended to encourage housing to meet the County's affordable housing needs and would therefore accommodate growth rather than induce it. Furthermore, the proposed Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels. It does not include any specific development proposals, nor does it grant any entitlements for development that would induce population growth. While the Housing Element does propose changes to existing land use densities and land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be required to be in accordance with local regulations, including the General Plan and County Code. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis

following submittal of a specific development proposal. Therefore, growth-inducing impacts would be less than significant.

b-c) No Impact. The proposed Housing Element encourages the provision and preservation of a range of housing types and affordability levels to meet the County's housing needs. Implementation of the Housing Element would not displace or decrease housing units in the County. Therefore, no impact would occur.

XIII. PUBLIC SERVICES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

There are six fire protection districts (FPD) in Inyo County: Big Pine FPD, Bishop FPD, Independence FPD, Lone Pine FPD, Olancha Volunteer Fire Department, and Southern Inyo FPD. In addition, federal land management agencies are responsible for fire protection on lands they manage: California Department of Forestry and Fire Protection (CalFire), National Park Service, U.S. Forest Service, and U.S. Bureau of Land Management. These agencies also provide fire protection to other areas through reciprocal agreements.

The Inyo County Sheriff’s Department provides law enforcement services to Inyo County. The department has 96 personnel positions, including 22 at the jail.

There are seven school districts in Inyo County with a total enrollment of 3,427 (Inyo County, 2002).

Park and recreation services in the County are discussed under the Recreation section below.

Discussion/Conclusion:

a-e) Less than Significant Impact. The proposed Housing Element includes policies and programs designed to facilitate the construction and conservation of housing to meet the County’s affordable housing needs. Subsequent residential development projects could result in an increase in demand for public services. However, the Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development. While the Housing Element does propose changes to existing land use densities and land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be

required to be in accordance with local regulations, including the General Plan and County Code. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, impacts associated with an increased demand for public services would be less than significant.

XIV. RECREATION	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

The natural environment within the County is its greatest attraction to tourists and many residents. The diversity found within the County provides ample and diverse recreational opportunities. Most of the recreational opportunities, such as campgrounds, recreation areas, wilderness areas, parks, natural open space, and Death Valley National Park, have been developed and managed by the public agencies that make up the majority of the landownership within the County.

Discussion/Conclusion:

a-b) Less Than Significant Impact. Future residential development consistent with the 2009 Housing Element could increase the use of existing neighborhood and regional parks or other recreational facilities, but due to its dispersed nature and relatively minor extent, this increased demand is not expected to require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. The proposed Housing Element is a policy-level document. While it encourages the provision of a range of housing types and affordability levels, it does not include any specific development proposals, nor does it grant any entitlements for development that would result in an increase demand for park and recreational facilities. Since there are no specific proposed residential developments, the demand and requirements for specific parkland acreages, park facilities, financing, and timing associated with the proposed Housing Element cannot be established at this time.

While the Housing Element does propose changes to existing land use densities and land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be required to be in accordance with local regulations, including the General Plan and County Code. For instance, Conservation/Open Space Element Policy REC-1.4 seeks to provide adequate parkland throughout the County through required parkland dedication and/or developer impact fees for new subdivisions within the County.

Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, impacts to park and recreation facilities and services would be less than significant.

XV. TRANSPORTATION/TRAFFIC	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

Transportation planning within Inyo County is geared toward the high influx of pass-through traffic (primarily tourists and trucks) and toward maintaining a satisfactory level of transportation services to the local population and local industry. The present road and highway system consists of approximately 3,396 miles as follows:

- 424 miles of state highways,
- 1,126 miles of county roads,
- 10 miles of city streets (in the City of Bishop), and
- 1,836 miles of privately and federally controlled roads.

Of the total system miles, approximately 850 miles are paved. Of the 1,126 miles of County roads and 10 miles of Bishop city streets, less than 425 miles are paved. Travel on all roads in Inyo County averaged 1,240,000 vehicle miles each day (Inyo County, 2002). Of the total miles traveled, 84 percent is on the state highway system and 16 percent on the remaining roads (Inyo County, 2002).

U.S. 395 is the major transportation corridor in and through Inyo County. This highway is the most traveled route in the County and is part of a major transportation corridor connecting the Eastern Sierra Region and Western Central Nevada to the Southern California Region. This corridor (along with Route 14) is the lifeline of all the major communities along the Eastern Sierra. The corridor branches in northeastern Kern County and provides access to the Eastern Sierra from the Los Angeles, San Fernando, and Antelope Valley areas via Route 14 and from the San Diego, San Bernardino, Orange County, and Ridgecrest areas via U.S. 395. This corridor has significance to both the Eastern Sierra Region and the State of California.

Discussion/Conclusion:

a-b) *Less Than Significant Impact.* The proposed Housing Element includes policies and programs designed to facilitate the construction and conservation of housing to meet the County's affordable housing needs. Subsequent residential development projects could result in an increase in traffic on County roadways, but this increase is anticipated to be relatively minor and is not expected to result in a substantial decrease in level of service (LOS) on those roadways. The Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development. While the Housing Element does propose changes to existing land use densities and land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be required to be in accordance with local regulations, including the General Plan and County Code. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Therefore, impacts associated with an increased demand for transportation facilities would be less than significant.

c) *Less Than Significant Impact.* As previously mentioned, Inyo County has seven public airports (located near the communities of Bishop, Furnace Creek, Independence, Lone Pine, Stovepipe Wells, Trona, and Shoshone) and six private airstrips within its boundaries. However, the Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development. While the Housing Element does propose changes to existing land use densities and land use regulations, it does not involve the construction or expansion of any residential land uses. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Future residential development consistent with the Housing Element is not expected to substantially alter air traffic patterns. Therefore, impacts associated with a change in air traffic patterns would be less than significant.

d-f) *Less Than Significant Impact.* As discussed under **a-b)** above, the proposed Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development that would affect the site design, emergency access, or parking of any developments. Future residential development projects will require compliance with General Plan policies related to traffic and circulation. Standard plan check procedures will ensure that appropriate site design, emergency access, and parking is provided for all residential development. Therefore, impacts would be less than significant.

g) Less Than Significant Impact. As discussed under **a-b)** above, the proposed Housing Element does not include any specific development proposals, nor does it grant any entitlements for development. Future residential development would be required to comply with General Plan policies related to alternative transportation (Circulation Element Roadway and Highway Implementation Measure 6.0 and Public Safety Element Policy AQ-1.2 and associated Implementation Measure 3.0). Therefore, the proposed Housing Element would not conflict with any local policies or ordinances supporting alternative transportation.

XVI. UTILITIES AND SERVICE SYSTEMS	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

The majority of the unincorporated regions of Inyo County are served by individual or community septic systems.

Inyo County currently operates community water systems located in Laws, Independence, and Lone Pine. In other parts of the County, community service districts or private systems provide domestic water.

There are four solid waste service providers in Inyo County. Benz Sanitation provides waste collection services from the Homewood Canyon Transfer Station to the Ridgecrest Landfill in Kern County. The amount of waste transferred to Kern County is estimated by the Source Reduction

and Recycling Element to be less than 1 percent of the total County waste stream (Inyo County, 2002). Serving the Lone Pine area, Sierra Disposal transports waste from both the Keeler Transfer Station and the Olancha Transfer Station to the Lone Pine Landfill. Bishop Waste Disposal, serving Bishop, Big Pine, and surrounding area with individual services, transports waste from the Big Pine Transfer Station to the Bishop-Sunland Landfill. Pahrump Valley Disposal collects waste from disposal bins dispersed throughout the town of Shoshone to the Tecopa Landfill.

The five permitted Inyo County landfills are Class III municipal solid waste disposal facilities. Each site is permitted to accept general residential, commercial, and industrial refuse for disposal, including municipal solid waste, construction and demolition debris, ash, and dead animals.

Discussion/Conclusion:

a-b); d-e) Less than Significant Impact. Future residential development in the County would require adequate municipal wastewater service and adequate domestic municipal water service, including adequate water supplies and wastewater treatment capacity. Increases in demand for wastewater and water service can also result in exceedance of wastewater treatment requirements and the need for new water or wastewater treatment facilities or expansion of existing facilities. The proposed Housing Element includes policies designed to facilitate the construction and conservation of housing to meet the County's affordable housing needs. However, the Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development. While the Housing Element does propose changes to existing land use densities and land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be required to be in accordance with local regulations, including the General Plan and County Code. Standard County review procedures require that new development provide for adequate wastewater treatment facilities, water supply, and appropriate treatment capacity. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal.

Therefore, impacts associated with a significant increase in demand for wastewater and water services would be less than significant.

c) Less than Significant Impact. The future development of housing consistent with the 2009 Housing Element could increase runoff and alter normal drainage patterns on project sites. As discussed under **a-b); d-e)** above, the Housing Element is a policy-level document that does not include any specific development proposals, nor does it grant any entitlements for development. Any future residential development in the County would be subject to further review. Therefore, impacts associated with the construction of new stormwater drainage facilities or the expansion of existing facilities is considered less than significant.

f-g) Less than Significant Impact. As discussed under **a-b); d-e)** above, the proposed Housing Element includes policies and programs designed to facilitate the construction and conservation of housing to meet the County's affordable housing needs but does not include any specific development proposals, nor does it grant any entitlements for development. Any future residential development would increase the demand for solid waste services in the area and would increase the amount of solid waste generated and sent to local landfills. Solid waste collection and disposal for single-family and multi-family residential units would be serviced by the private haulers mentioned above. Assembly Bill 939 and the County Integrated Waste Management Plan, which require recycling programs that result in diversion away from landfills, would apply to new development. Therefore, solid waste impacts would be less than significant.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE

NOTE: If there are significant environmental impacts which cannot be mitigated and no feasible project alternatives are available, then complete the mandatory findings of significance and attach to this initial study as an appendix. This is the first step for starting the environmental impact report (EIR) process.

Does the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) 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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion:

a) and c) Less Than Significant Impact. The Housing Element is a policy-level document. While the Housing Element encourages the provision of a range of housing types and affordability levels, it does not include specific development proposals, nor does it grant any entitlements for development that would have the potential to degrade the quality of the environment to adversely affect human beings. While the Housing Element does propose changes to existing land use densities and land use regulations, it does not involve the construction or expansion of any residential land uses. All future residential development occurring within the County would be required to be in accordance with local regulations, including the General Plan and County Code. Standard County project review procedures work to minimize potential impacts. Environmental impacts of subsequent development projects may also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Future residential development projects would require compliance with General Plan policies and other County codes and ordinances intended to protect the environment. Therefore, the proposed Housing Element would result in less than significant

adverse impacts to the environment or to human beings as a result of environmental degradation.

b) *Less Than Significant Impact.* As discussed above, the proposed Housing Element is a policy-level document that does not propose any specific development. Therefore, identifying or analyzing cumulative impacts would be speculative at this time. Future residential development projects and/or policies may be subject to environmental review, including a review of cumulative impacts. Due to the relatively minor scope and dispersed nature of new housing anticipated during the planning period, potential cumulative impacts are expected to be negligible. Continued monitoring of overall development activities will work to ensure less than significant cumulative effects. Therefore, impacts would be less than significant.

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