



CEQA INITIAL STUDY:

ACQUISITION OF FEE TITLE FOR CONTINUED OPERATION OF BISHOP-SUNLAND, INDEPENDENCE, AND LONE PINE LANDFILLS, INYO COUNTY

State Clearinghouse No: 2022020028

Lead Agency:
County of Inyo
168 North Edwards Street
Independence, CA

JULY 2022

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Project Description and CEQA Summary

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| Project title: | Acquisition of Fee Title for Three Properties for Continued Operation of Bishop–Sunland, Independence, and Lone Pine Landfills |
| Lead agency name and address: | Inyo County 168 North Edwards Street Independence, CA 93526 |
| Contact person and telephone number: | Mr. John Pinckney Deputy Director, Department of Public Works (760) 878-0207 |
| Project location: | <p>The three properties proposed for acquisition by the County for the purpose of continued solid waste disposal are the existing public landfill facilities near the City of Bishop and the communities of Independence and Lone Pine– the Bishop–Sunland Landfill, Independence Landfill, and Lone Pine Landfill. The County currently operates three landfills pursuant to leases from the Los Angeles Department of Water and Power (LADWP). The Bishop–Sunland Landfill, established in 1955, is located on a 120-acre site 2 miles southwest of Bishop, and has an unlined disposal footprint covering 78 acres. The Independence Landfill, established in 1965, is located on a 90-acre site south of Independence. The Lone Pine Landfill, established in 1965, is located on approximately 60 acres southeast of the unincorporated community of Lone Pine. All three landfills are operated by the County subject to oversight and permits by the County Department of Environmental Health Services, the California Department of Resources Recycling and Recovery (CalRecycle), the Lahontan Regional Water Quality Control Board (RWQCB), and the Great Basin Unified Air Pollution Control District (GBUAPCD).</p> <p>Facility address and permit identification numbers are listed below:</p> <p>BISHOP-SUNLAND CLASS III LANDFILL 110 Sunland Reservation Road Bishop, CA 93514 SWFP Facility Number 14-AA-0005 Waste Discharge Requirements: RWQCB Order No. 6-01-34, WDID No. 6B140300002</p> <p>INDEPENDENCE CLASS III LANDFILL End of Dump Road Independence, CA 93526 SWFP Facility Number 14-AA-0004 Waste Discharge Requirements: RWQCB Order No. 6-95-116, WDID No. 6B140300004</p> |

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| | <p>LONE PINE CLASS III LANDFILL End of Substation Road Lone Pine, CA 93545 SWFP Facility Number 14-AA-0003 Waste Discharge Requirements: Board Order No. 6-95-70, WDID No. 6B140300006</p> <p>See attached Location Map and Site Facility Plans for each of the three subject properties.</p> |
| Project sponsor's name and address: | <p>John Pinckney, Deputy Director Inyo County Public Works 168 N. Edwards St PO Drawer Q Independence, CA, 93526 E-mail: jpinckney@inyocounty.us</p> |
| General plan description: | <p>The General Plan Land Use Element designates the project sites as "Public Facilities." Landfill operation at the sites are consistent with this designation. Continued operation of these sites as landfills are also consistent with the County Solid Waste Management Plan and the Countywide Siting Element.</p> |
| Zoning: | <p>Zoning classification of Public Use (P) and Open Space (OS-40), which conditionally permits landfill operations</p> |
| Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for project implementation) | <p>Acquisition of Fee Title for Three Properties for Continued Operation of Bishop-Sunland, Independence and Lone Pine Landfills, including definition of parcels to encompass existing site facilities, transfer of fee title from LADWP to Inyo County, continued long-term operation of the landfill facilities, and compliance with applicable laws, regulations and permits for solid waste facilities</p> |
| Surrounding land uses and setting: (Briefly describe the project's surroundings) | <p>Independence and Lone Pine Landfills are surrounded by mostly undeveloped land, Bishop-Sunland Landfill has adjacent agricultural, industrial uses and businesses including a salvage yard, mining of aggregate and decomposed granite and road construction staging yards</p> |
| Other public agencies whose approval is required (e.g., permits, financial approval, or participation agreements): | <p>With the proposed acquisition of fee title by the County for the subject properties, continued operation of each of these essential public facilities would be continued by the County, in compliance with current regulations, under the authority of three primary permitting agencies: 1) Inyo County Environmental Health Department (ICEHD), serving as the Local Enforcement Agency (LEA); 2) CalRecycle; and 3) LRWQCB. Parcels and conditional use permits (CUPs) subject to review and approval by Inyo County Planning Department. A voluntary sale of the landfill properties to the County requires LADWP's consent.</p> |

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1.0 PROJECT BACKGROUND

Inyo County prepared this Initial Study (IS), in accordance with the California Environmental Quality Act (CEQA), for evaluation of environmental impacts related to the acquisition of three properties for continued long-term operation of the Bishop-Sunland, Independence, and Lone Pine Landfills.

These three existing Class III Landfills have been operated by Inyo County for decades under leases from the City of Los Angeles DWP ("LADWP"), and are the only active landfill facilities serving the City of Bishop, the communities of Big Pine, Independence and Lone Pine, and unincorporated areas of the Owens Valley. In order to ensure an effective, long-term waste management program in compliance with applicable permits, laws and regulations, the County proposes to acquire the fee title for the three properties. The environmental review presented herein focuses on the transfer of ownership of the three parcels, as well as other related activities that could cause a physical change to the environment.

Need for Project

The County operates landfills on properties owned by LADWP near the City of Bishop and the communities of Lone Pine and Independence. The Landfill Properties are leased from LADWP and the continued and uninterrupted operation of the landfills in compliance with applicable laws and regulations is contingent, in part, on securing renewals and/or extensions of the leases.

In 2016, during the course of lease negotiations for the Bishop-Sunland Landfill, LADWP imposed a fourfold rent increase, included a clause allowing LADWP to terminate the agreement for any reason with a 180-day notice, and established a lease term of only 3 years.

The lease restrictions imposed by LADWP, and the inability to secure long-term land tenure call into question the County's ability to ensure long-term waste management services and require the County to take action to ensure the availability of such resources in the future. The terms of the current lease for the Bishop-Sunland Landfill hinders the County's ability to effectively interact with state agencies having regulatory authority over landfill operations. The Bishop lease requires LADWP approval for all interactions with those regulatory agencies, and LADWP reserves the right to ultimately block or revise any action the County wishes to take, including actions necessary to comply with requirements imposed by state regulators. As a result, there are delays and uncertainty with respect to all regulatory agency approvals.

Based on the County's conclusion that continuing to operate the Landfill Properties through negotiated leases is not sustainable in the long-term, the County evaluated alternatives to ensure that the County could maintain financially sustainable and environmentally sound means of waste disposal for the County and its residents.

The Integrated Waste Management Act of 1989 requires counties to adopt County-wide waste management plans that, among other things, provide for at least 15 years of capacity for the disposal or transformation of solid waste generated within the County that cannot be

reduced, recycled or composted. Permitting of these sites also requires approval and frequent update of Closure Plans, including implementation and financial commitment by the County for the operational life of the landfills (estimated to be 30–45 years) and throughout a post-closure monitoring and maintenance period (30-years after closure). The short-term leases mandated by LADWP are incompatible with these requirements. Ownership of the properties that encompass these existing facilities is essential for the County to comply with these long-term liability and financial commitments in a manner protective of the environment.

CEQA Background

In 1999, MNDs were adopted for the operation of the Bishop–Sunland, Independence, and Lone Pine Landfills. These MNDs evaluated all of the environmental issue areas identified in the CEQA IS Checklist (Appendix G of the CEQA Guidelines) in effect at the time. Mitigation measures were identified for the following topics: Geology and Soils, Noise, Hazardous Materials, and Hydrology and Water Quality. These mitigation measures have been summarized in Table 1. In 2012, during the required 5-year permit review and revision procedures, the County prepared addenda to the MNDs, summarizing the primary changes in Solid Waste Facility Permits (SWFPs) to bring the three facilities up to date with current site conditions and to address new regulations. The addenda concluded that only minor technical changes and additions to the permits were necessary to better reflect existing landfill operations and to adjust to current and projected waste disposal rates. The addenda also concluded that no new mitigation measures were necessary. No significant change to the environment was anticipated due to an update of the SWFPs for continued operation and compliance activities, and the MNDs in combination with the addenda were determined to be adequate for permitting procedures approved by Inyo County Environmental Health Department, the LRWQCB, and CalRecycle. The MND as amended for the Bishop–Sunland Landfill was also confirmed to be adequate for the update of the SWFP, reissued in 2017.

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

(a) "Project" means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

- (1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvement to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700.
- (2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants subsidies, or other forms of assistance from one or more public agencies.

(3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

The term "project" refers to the whole of an action and to the underlying physical activity being approved, not to each government approval (CEQA Guidelines Section 15378[c]). Thus, even if the Lead Agency needs to grant more than one approval for a project, only one CEQA document should be prepared. Similarly, if more than one government agency must grant an approval, only one CEQA document should be prepared. This approach ensures that responsible agencies granting later approvals can rely on the lead agency's CEQA document. Subsequent approvals will include approvals by: 1) Inyo County Environmental Health Department (ICEHD), serving as the Local Enforcement Agency (LEA); 2) CalRecycle; 3) LRWQCB; and 4) Inyo County Planning Department, for consideration of zoning changes and potential conditional use permits (CUPs).

The CEQA Guidelines define a project under CEQA as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment. In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by Responsible Agencies.

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

- For a phased development project, even if details about future phases are not known, future phases must be included in the project description if they are a reasonably foreseeable consequence of the initial phase and will significantly change the initial project or its impacts. *Laurel Heights Improvement Association v Regents of University of California* (1988) 47 Cal. 3d 376.
- For a planning approval such as general plan amendment, the project description must include reasonably anticipated physical development that could occur in view of the approval. *City of Redlands v. County of San Bernardino* (2002) 96 Cal. App. 4th 398.
- For modification of a permit for an existing facility, the scope of the project description can be limited to the scope of the permit modification and does not cover the entire facility. *Citizens for East Shore Parks v. State Lands Commission* (2011) 202 Cal.App.4th 549.

This latter case law example applies to the proposed Project and reinforces the adequacy of the 1999 MNDs as amended in 2012, as they pertained to the operational changes and permit revisions proposed at the time. However, the currently proposed Project, which is subject to new discretionary approval by the County as Lead Agency, is the transfer of land ownership of the existing facilities. The acquisition of fee title alone would not result in any physical changes to the environment other than the continued operation of the facilities; however, CEQA requires that the whole of the action, and any foreseeable direct or indirect impacts to the environment, to be considered and evaluated for significance, appropriate mitigation measures to be applied where applicable and feasible to reduce the impacts.

Need for Additional Environmental Review

In 2017, the Inyo County Board of Supervisors considered the status of these three landfills and passed Resolutions of Necessity to proceed with condemnation of the three properties in order to continue to operate these essential public facilities and enable the long-term planning horizon necessary for solid waste management to be conducted in a fiscally and environmentally responsible manner.

Litigation was subsequently initiated by LADWP, and the Resolutions of Necessity were challenged on the basis of a failure to comply with CEQA. That litigation ultimately resulted in a requirement for the County to restart the eminent domain actions with a legally sufficient project description if the County intended to continue in its efforts to acquire ownership of the landfill properties. Although the litigation kept open the possibility for the County to rely upon a CEQA exemption(s) for the landfill acquisition, in an abundance of caution and with the expectation that LADWP will raise a CEQA challenge to any effort by the County to acquire the landfill properties, the County is undertaking the creation of an EIR.

An expansion of the facilities and any major operational changes that could result in new physical changes to the environment is not a part of the proposed Project. The proposed change of property ownership would merely allow Inyo County to continue to operate these essential public facilities in compliance with applicable laws and regulations. These regulations provide a framework for mitigating environmental impacts to the extent practical and appropriate. However, it is recognized that without appropriate ongoing mitigation measures, the continued operation of these facilities as solid waste disposal sites could have adverse impacts on the environment over time. Inyo County is committed to responsible stewardship of these facilities, and eventual closure and reclamation activities in accordance with applicable laws governing landfills in California.

Although direct physical impacts are not anticipated from the proposed Project, continued disposal of solid waste in unlined landfills can cause additional impacts over the life of the landfills and the closure period. In addition, mitigation measures and alternatives have been identified that may lessen, or increase, the significance level of the cumulative environmental impacts. Therefore, the CEQA IS Checklist and EIR will focus on evaluation of the adequacy of mitigation measures, and project alternatives, to determine if additional mitigation measures are necessary to reduce cumulative impacts to a less than significant level. If impacts cannot

be mitigated to less than significant, a Statement of Overriding Conditions may be required for the proposed Project, to ensure Inyo County can meet the solid waste disposal needs of the residents of the County in a fiscal and environmentally responsible manner.

2.0 SCOPING OF ENVIRONMENTAL IMPACT ANALYSIS

Notice of Preparation and Public Scoping Input

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

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

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

Initial Study Checklist and Determination

Due to the complexity of the individual elements of the proposed Project, many of which were previously analyzed as part of the ongoing facility permitting, and to ensure incorporation of environmental impact analysis scoping comments by the public, local Tribes and the Responsible Agencies involved, a detailed Project Description and CEQA IS Checklist was prepared after the Public Scoping Meeting and public comment period. The CEQA IS Checklist, included herein, was intended to focus and define the scope of the anticipated EIR for the proposed Project.

Review of Existing Mitigation Measures

Where mitigation measures were previously established by the MNDs for these three facilities, and as dictated by the agencies with oversight on the landfill operations, these mitigation measures are being evaluated to determine whether they remain effective in reducing environmental impacts to a less than significant level as determined by the MNDs and

associated addenda. Where necessary, if additional analysis is required to evaluate the effectiveness of the mitigation measures, or whether additional mitigations are feasible and appropriate to reduce impacts, that analysis will be included in the EIR.

Review of Project Alternatives

The CEQA Guidelines state that an "EIR shall describe a range of reasonable alternatives to the proposed project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (CEQA Guidelines Section 15126.6). Alternatives to the proposed Project will be addressed in the EIR.

The CEQA Guidelines further state that "the range of alternatives required in an EIR is governed by a rule of reason" that requires the EIR to set forth only those alternatives necessary to permit fully informed decision making. The alternatives shall be limited to those that would avoid or substantially reduce any of the significant and unavoidable effects of the proposed Project. Of those alternatives, the EIR needs to examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic Project objectives (CEQA Guidelines Section 15126.6).

Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered (CEQA Guidelines Section 15126.6[a]). In defining feasibility of alternatives, the CEQA Guidelines state that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site" (CEQA Guidelines Section 15126.6).

The alternatives selected for review must adequately represent the spectrum of environmental concerns to permit a reasonable choice of alternatives. The CEQA Guidelines also require the analysis of a No Project Alternative. The EIR must also provide the rationale for selecting or defining the alternatives to be evaluated, including the identification of any alternatives that were considered by the Lead Agency, but rejected as infeasible during the scoping process. Based on the alternatives analyzed, the Lead Agency must identify an Environmentally Superior Alternative.

3.0 DETAILED PROJECT DESCRIPTION

The County has operated three existing landfills near the City of Bishop and the communities of Independence and Lone Pine for over 50 years, to provide legally mandated and essential waste disposal services to the public. For the County to continue to use and operate the Landfill Properties for solid waste disposal purposes in accordance with permit requirements, and in compliance with current laws and regulations regarding landfills in California, the County must acquire the properties on which the waste disposal facilities are located. The County does not intend to change the general use of the properties at issue from their existing uses. However, general operations may be modified as required to comply with current regulatory requirements set forth by Public Resources Code, Division 30; California Code of Regulations (CCR) Title 14; CCR Title 27; SWFPs issued by CalRecycle; Waste Discharge Requirements (WDRs) issued by the LRWQCB; and other applicable local, state, and federal regulations.

The County operates the three subject landfills on properties currently owned by LADWP, and the continued and uninterrupted operation of the landfills is contingent on securing renewals and/or extensions of the leases. The SWFPs for the landfills must be reviewed every 5 years and revised as necessary to reflect current waste loads and site life calculations, approved Preliminary Closure and Post-Closure Maintenance Plans (PCPCMPs), and changes to the WDRs including implementation of any required corrective action. Due to a complete breakdown of the landlord-tenant relationship with LADWP, timely renewals of reasonable and acceptable leases with LADWP became impossible.

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

With the proposed acquisition of fee title by the County for the subject properties, operation of each of these essential public facilities will continue in compliance with current regulations under the authority of three primary permitting agencies:

1. Inyo County Environmental Health Department (ICEHD), serving as the Lead Enforcement Agency (LEA)
2. California Department of Resources, Recycling and Recovery (CalRecycle)
3. Lahontan Regional Water Quality Control Board (LRWQCB)

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

- Description of the parcels proposed for acquisition, to include the existing leased facility areas and the existing facility components. The parcel for Bishop–Sunland Landfill is proposed to include the existing groundwater supply well which is located outside of the existing lease boundary. The legal description of the parcels will also include the easements or access agreements that are necessary to ensure access to landfill gas and groundwater monitoring well networks for each facility required by CCR Title 27, and current WDRs.
- Update of the recently approved PCPCMPs for each landfill, for approval by the LEA and CalRecycle
- Update of the Joint Technical Document (JTD) / Report of Disposal Site Information for each landfill
- Preparation of a Solid Waste Facilities Permit Revision Application for each of the three landfills, for submittal to the LEA, CalRecycle, and the LRWQCB
- Revision of WDRs with the LRWQCB to reflect property transfer and current Evaluation Monitoring Program (Lone Pine Landfill) and Corrective Action Program (Bishop–Sunland Landfill)
- Continuation of landfill gas monitoring and reporting according to Title 27 requirements, groundwater monitoring and reporting according to current Monitoring and Reporting Programs (MRPs), and continued implementation of Evaluation Monitoring and Corrective Action Monitoring programs.
- Continued monitoring and operation of the septage ponds, contaminated soil landfarm, asbestos disposal area, waste oil disposal and recycling facilities, and waste diversion programs according to permit and WDR requirements
- Evaluation of existing and alternative water supply necessary for dust-control and other on-site operational uses, with proposed installation of an on-site supply well at Independence Landfill and Lone Pine Landfill to replace the current practice of trucking water onto the site for such uses. The proposed parcel for Bishop Sunland Landfill includes the existing supply well, so no additional wells are proposed.

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

Identification of Parcels

In order to acquire these properties the Inyo County would develop tentative parcel maps, subject to review and approval by the Inyo County Planning Department to ensure compliance with county General Plan and zoning regulations. Proposed acquisition

boundaries are shown on Tentative Parcel Maps presented on Figures 2, 3 and 4 for the Bishop-Sunland, Independence and Lone Pine Landfills, respectively. All three landfills are currently designated as OS-40 and/or Public. OS-40 conditionally permits landfill operations. Inyo County intends to acquire only the portions of the Landfill Properties necessary for operations. The following activities are anticipated based on review of existing parcels, zoning, and land use designation, but are subject to change based on approval processes by the Inyo County Planning Department.

At Bishop-Sunland Landfill, the current parcel includes the landfill, Browns Salvage Yard, Bishop Waste Disposal, Eastern Sierra Propane and a vacant lot to the east of the landfill. Proposed boundaries are shown on a Tentative Parcel Map presented on Figure 2. The proposed landfill acquisition would require a lot split into four separate lots, to separate the adjacent non-contiguous businesses into their own parcels. The newly formed landfill parcel will be rezoned as OS-40 (currently a split between Public and OS-40). Brown's Salvage will be rezoned to Industrial in order to bring the current operations into conformity with the zoning. No zoning changes will be required for newly formed parcel on which Eastern Sierra Propane and Bishop Waste Disposal operate. The proposed landfill parcel boundary will generally follow the former landfill lease footprint, with the exception of a lot line adjustment to capture the current water supply well. Access agreements or easements will be defined for the offsite monitoring wells, which are currently accessed and maintained through a license agreement with LADWP. These off-site wells include two down-gradient wells immediately adjacent to the landfill on the East, as well as two up-gradient/background monitoring wells located in or in close proximity to the Browns Salvage lease on the southwest side of the Bishop Landfill. A CUP may be obtained for the proposed landfill parcel even though the current operations are grandfathered in without a CUP.

The Independence Landfill will require a parcel split to create a separate parcel conforming to the current lease boundary. A lot line adjustment may be necessary to capture the western edge of the lease boundary. This area may also be excluded from the acquisition if it is not deemed necessary to county operations. No zoning changes are necessary. A CUP may be obtained for the proposed landfill parcel even though the current operations are grandfathered in without a CUP.

The Lone Pine Landfill will require a subdivision of two parcels and a merger of the two resulting landfill areas, to make a new landfill parcel. Current zoning is a mix of OS-40 and Public. The created landfill parcel will be rezoned to OS-40. Access agreements or easements will be defined for the offsite monitoring well to the east of the site, as shown on Figure 4. A CUP may be obtained for the proposed landfill parcel even though the current operations are grandfathered in without a CUP.

Review of Permit Details for Significant Operational Changes

The SWFPs for the three sites are reviewed for updates and adequacy every 5 years. This 5-year review is conducted by the Inyo County Environmental Health Department, acting as LEA, and is subject to review and concurrence by CalRecycle. The SWFP for Bishop-Sunland

Landfill was renewed in 2017, so the next 5-year review will be initiated in 2022. No permit revisions are currently anticipated for the Bishop-Sunland Landfill, unless directed by the LEA as part of that 5-year review and determination.

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

As discussed above, an expansion of the facilities is not part of this project; however, the remaining disposal capacity and associated site life and estimated closure year are recalculated frequently. The estimated closure years for these three facilities, assuming current waste disposal rates and continued operation of the facilities by Inyo County, are 2064 for Bishop-Sunland Landfill, 2068 for Independence Landfill, and 2052 for Lone Pine Landfill, equating to site life estimates of 30 to 48 years (GLA, 2015). These estimates and the approved PCPCMPs will be updated, as necessary. The approved Closure Plans will then be implemented, requiring installation of approved final cover material and post-closure maintenance and monitoring for a 30-year post-closure period. Inyo County is required to provide financial assurances that cover Closure activities as well as foreseeable corrective action activities. This mandatory long-term planning horizon, and obligation by Inyo County to operate, close and monitor these landfill sites for over six decades, reinforces Inyo County's need to own the landfills.

More than a decade ago, the County had discussions with Mono County and the Town of Mammoth concerning the possibility of importing waste generated from within those entities. No agreements were reached regarding the importation of waste and no further discussions with respect to waste importation have been conducted. At present, the County has no plan for import waste that is generated from outside of the County. Consequently, the importation of waste generated outside of the County is not a part of the proposed Project and will not be addressed in the EIR. If, in the future, the County proposes to import waste generated from outside the County, that activity will be addressed in compliance with CEQA.

The periodic review and revision of SWFPs also includes update of the PCPCMP and JTD/Report of Disposal Site Information for each of these sites, subject to review and approval by CalRecycle and the LRWCQB. Proposed SWFP modifications are reviewed for significant impacts under CEQA, which was most recently conducted by Inyo County through the addenda to the MNDs prepared in 2012. Although the project does not propose an expansion to the landfill sites or operations, it does include a renewal of the SWFPs for Independence and Lone Pine Landfills. The changes to these two SWFPs are minor and are summarized below.

Independence Landfill – The foreseeable modifications to the SWFP are anticipated to be limited to the following:

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

Lone Pine Landfill – The foreseeable modifications to the SWFP are anticipated to be limited to the following:

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

Other Regulatory Compliance Activities

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

- Operation and maintenance of landfill gas (LFG) extraction systems at Bishop-Sunland Landfill, according to the approved Corrective Action Plan (CAP). Emissions monitoring (and filter changeout as necessary) of the carbon filters according to Permits to Operate issued by the GBUAPCD

- Monitoring of landfill gas perimeter probes at each of the landfills, in accordance with Title 27. Exceedance of 5 percent by volume of methane at any perimeter probe requires notification to the LEA and CalRecycle, with potential corrective action, as necessary
- Quarterly or semi-annual groundwater monitoring and reporting, according to current WDRs and MRPs issued by the LRWQCB for each of the landfills. These WDRs dictate evaluation monitoring and corrective action procedures if impacts to groundwater are observed, and Inyo County plans to continually comply with, and update these WDRs as necessary to reduce impacts from landfilled waste to groundwater beneath the sites
- Implementation of recycling, diversion and household hazardous waste disposal programs to reduce these materials from being landfilled
- Control of windblown trash through daily cover operations, wind fences, and other measures as dictated by the LEA
- Dust control through application of water to roads and active working faces, as necessary or as dictated by the GBUAPCD

4.0 BASELINE CONDITIONS AND MONITORING PROGRAMS

CEQA Guidelines Section 15125 describes that "the lead agency should describe the physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective." The following sections summarize the existing environmental setting, facility descriptions and existing environmental monitoring programs which are considered to be the baseline conditions for evaluation of physical changes that would result from the proposed Project.

Baseline facility components, as dictated by current SWFPs and WDRs are also summarized in Table 2.

Bishop Sunland Landfill

The Bishop–Sunland Landfill was established in 1955 to serve the disposal needs of the residents of Bishop, California. It serves the surrounding unincorporated communities including Big Pine Wilkerson and West Bishop. It is designated by the State of California as a Class III disposal site, accepting only non-hazardous municipal solid waste including residential, commercial and industrial waste, construction and demolition debris, ash and dead animals. The landfill is also permitted to accept non-friable-only asbestos under specific disposal restrictions. Daily operations are conducted in compliance with state minimum standards and an average of 50–80 tons of waste are accepted per operating day for disposal.

The Bishop–Sunland Landfill is located approximately two miles south of the City of Bishop, west of Highway 395 and is bordered by Warm Springs Road to the south, Sunland Drive to the west, and Sunland Indian Reservation Road to the north. The site can be accessed from Sunland Reservation Road. The general location of the landfill is presented in Figure 1. Figure 5 shows the Existing Site Facilities Plan with more detail including waste footprint, current lease boundary, site facilities and monitoring network.

The current water supply well for the Bishop–Sunland Landfill is located in an adjacent parcel to the northeast of the leased facilities, and is currently plumbed and dedicated to on-site Landfill uses, including: dust-control using water trucks, non-potable use at the gate house and restroom, and other ancillary operational and safety uses. The proposed parcel for acquisition includes the existing supply well, and reasonable access around the well for maintenance. The Project does not propose any change in groundwater use for Bishop–Sunland Landfill. Approximate water consumption at Bishop Sunland Landfill is 6,000–10,000 gallons per operating day, the majority of which is used to fill water trucks as necessary for dust abatement.

The Bishop–Sunland Landfill is leased (the lease has expired and is now in "holdover" status) to Inyo County by LADWP. The landfill is located on an alluvial floodplain of gravel, sand, silt, and clay, which slopes east toward the Owens River. Sections of clay and silt in excess of 10 feet

thick are noted in the stratigraphic profile of soils beneath the landfill. Tuff bedrock is located at depths ranging from 150 to 200 feet below ground surface (bgs). Based on surface topography, a geologic fault is projected through the landfill. Information from the 1999 MND prepared for the landfill estimated a recurrence interval for the projected fault at 4,000 years.

Groundwater beneath the landfill is found in unconsolidated materials and occurs at depths ranging from approximately 70 to 130 feet bgs. Groundwater beneath the landfill is identified as flowing generally east toward the Owens River at a slope of approximately 0.011 feet per foot. (TEAM 2009–2021).

The Bishop Creek Canal, A-1 Drain Canal, and Owens River Canal are approximately 2 miles, 0.5 miles, and 2.5 miles from the landfill, respectively. There is no perennial surface water flow directly at the landfill. All storm water from the landfill is regulated under the State Amended General Industrial Activities Storm Water Permit.

The land uses at and surrounding the landfill consist of various maintained residences and commercial buildings in the City of Bishop (located approximately 2 miles from the landfill), open high desert land, agricultural, grazing uses and recreational uses.

The existing unlined landfill receives approximately 50–80 tons of waste per day on average (based on 2021–22 quarterly reports). The landfill maintains a waste load checking program as required by Section 20008 of Title 27, CCR. Based on the quantity of waste received per day, the landfill is a Small Landfill as defined in Federal Subtitle D.

The Bishop–Sunland Landfill, septage ponds, monofill, and landfarm (referred together as the landfill) receive waste derived from the City of Bishop and nearby communities. The landfill is permitted to accept non-hazardous solid and inert waste, respectively, and is defined as municipal solid waste in Subtitle D. The monofill is a 0.37-acre area of the landfill that is permitted to accept non-friable asbestos waste only.

The liquid and semi-solid waste discharged to the Bishop–Sunland Landfills Class II Ponds is septage primarily pumped from commercial chemical toilets within Inyo County and the City of Bishop. Four evaporation ponds are located at the landfill, as shown on Figure 2. The ponds receive septage waste containing volatile organic compounds (VOCs) and chemical toilet waste. According to the WDRs, the Ponds have a combined capacity of 0.084 million gallons and approximately 450,000 gallons of wastewater is discharged to the ponds annually (RWQCB 2001).

The ponds have been constructed with a clay liner which meets the construction requirements for Class II surface impoundments of Section 20330, Title 27, CCR. The waste received at the septage ponds (ponds) is liquid designated waste. It is not permitted to discharge industrial waste to the ponds.

Non-friable asbestos is discharged to an unlined 36,000 square foot area of the landfill, shown in Figure 2. Approximately 9,220 cubic feet of asbestos had been discharged to the monofill as of 2001 (RWQCB 2001). The source of the asbestos is commercial waste from areas of Inyo

County and the City of Bishop. Advanced notice is required prior to receiving loads of asbestos at the landfill.

The current detection monitoring program requirements are outlined in the WDRs and associated MRP. Additional requirements are outlined in the 2004 Evaluation Monitoring Program for the site (Helgoth 2004). The Water Quality Protection Standard for the landfill consists of constituents of concern, monitoring parameters, monitoring points, point of compliance and concentration limits. The monitoring parameters for the landfill are chloride, sulfate, nitrate as nitrogen, total dissolved solids (TDS) and VOCs as defined by Appendix I of 40 CFR Part 258.

The first four groundwater monitoring wells were installed in 1987 (MW-1 through MW-4). MW-5, MW-6 and MW-7 were installed in May of 2002 with MW-5 being an additional upgradient well and MW-6 and MW-7 being down-gradient wells (Helgoth 2004). In September 2003, two new well pairs were installed (MW-8s, MW-8d, MW-9s and MW-9d). The installation of a new background monitoring well (MW-1R) occurred in December 2021. All monitoring wells are located within the proposed parcel boundaries, with the exception of off-site monitoring wells MW-1, MW-1R, MW-8 and MW-9 which are accessed and maintained through a license agreement issued by LADWP. Monitoring well locations are shown on Figures 2 and 5.

Groundwater monitoring at the Bishop-Sunland Landfill is currently conducted quarterly with semi-annual reporting to the RWQCB in January and July, respectively, with an annual report due by March 1.

Groundwater monitoring wells MW-2, MW-3, MW-4, MW-6 and MW-7 are currently utilized as monitoring points for detection monitoring at the point of compliance. Wells MW-1, MW-1R and MW-5 are upgradient of waste units and were intended to be background monitoring points, however, these upgradient monitoring wells have been impacted by VOCs. MW-8s, MW-8d, MW-9s and MW-9d are not considered monitoring points of compliance but are utilized for off-site monitoring. Groundwater monitoring well locations are indicated on Figure 2.

A Corrective Action Plan was approved for the Bishop-Sunland Landfill in 2015, with the extraction and filtration of landfill gas being the primary mechanism for reducing impacts of VOCs to groundwater. Additional corrective actions are at the discretion of the RWQCB and are not currently required.

A revised SWFP for the facility was issued on September 18, 2017, which increased the Permitted Maximum Tonnage to 160 tons per day and the permitted design capacity to 6,016,716 cubic yards. A 5-year Permit Review is scheduled to be initiated in 2022, and a Permit Revision would likely be required to update the landowner if the proposed Project is approved. No other significant changes to the SWFP are anticipated.

Independence Landfill

The Independence Landfill was established in 1965 to serve the disposal needs of the residents of Independence, California and the surrounding area. It is designated by the state of California as a Class III disposal site, accepting only non-hazardous municipal solid waste. Daily operations are conducted in compliance with state minimum standards and an average of 5-10 tons of waste are accepted per operating day for disposal (based on 2021-22 quarterly reports).

The Independence Landfill is leased (the most current lease has expired and is now in "holdover" status) to Inyo County by LADWP. The Independence Landfill is located about a mile southeast of the unincorporated community of Independence. It is to the east of Highway 395 and is accessed by Dump Road. There are several dirt roads around the landfill. The general location of the landfill is presented in Figure 1. Figure 6 shows the site with more detail including, waste footprint, current lease boundary, site facilities and monitoring network.

Current water use on the site is limited to dust abatement activities, through the use of water trucked onto the site as-needed from the existing Independence town water supplies. Approximately 2000 gallons per operating day are currently used on-site. When an on-site supply well is installed, it would likely be located near the landfill entrance and uses would be expanded to sanitary facilities (restroom), employee safety facilities, and fire suppression uses as necessary for continued operations of the site as a landfill.

The Independence Landfill is located at the toe of a broad, gently sloping alluvial fan elevated approximately 160 feet above the Owens Valley floor. Topography in the immediate vicinity trends northeast toward the Owens River at an approximate two percent grade (Minschew 2009). Regional depth to first-encountered groundwater varies from approximately 55 to 100 feet bgs. Groundwater beneath the landfill flows generally to the east toward the Owens River at an approximate hydraulic gradient of approximately 5 feet per mile (RWQCB 1995).

There is no perennial surface water flow at the landfill. Surface water during storm events generally flows east of the landfill towards the Owens River. The nearest surface water bodies are the Los Angeles Aqueduct (located approximately 0.75 to 1 mile to the east) and the Owens River (approximately 2 to 2.5 miles to the east). The land uses surrounding the landfill are limited to various maintained residences and commercial buildings in the community of Independence, and open desert land. The facility is located on land owned by the LADWP and historically operated under lease to Inyo County.

The current detection monitoring program requirements are outlined in the WDRs and associated MRP. The Water Quality Protection Standard for the landfill consists of the identified constituents of concern (COCs), monitoring parameters, monitoring points, point of compliance and concentration limits. The routine monitoring parameters for the landfill are chloride, sulfate, nitrate (as nitrogen), TDS, and VOCs as defined by Appendix I of 40 CFR Part 258.

Groundwater monitoring wells MW-2, MW-3 and MW-4 are utilized as monitoring points for detection monitoring at the point of compliance. Well MW-1 is considered the background monitoring point (RWQCB 1995). Groundwater monitoring well locations are illustrated on Figure 3. Groundwater monitoring at the Independence Landfill has been conducted semi-annually since 2001 under a Detection Monitoring Program.

Recent site conditions indicate a stable-to-decreasing trend in VOC detections at downgradient wells MW-2 and MW-3. If an increase in downgradient VOC detections is observed, an Evaluation Monitoring Program may be required. Inyo County met with RWQCB staff in March 2019 to discuss the current status of the site, and the RWQCB confirmed that continuation of a Detection Monitoring Program was appropriate and in compliance with the WDRs for the Independence Landfill, until otherwise notified by the RWQCB.

A SWFP revision application, including a revised JTD prepared by Geo-Logic Associates, was submitted by Inyo County to LADWP for signature in June 2015 after several rounds of LADWP and agency review. The permit revision packet had been accepted as complete by the Inyo County Environmental Health Department serving as the LEA, but was never signed by the landowner LADWP so was not processed by CalRecycle through the issuance of an updated SWFP. In 2018, the LEA completed a 5-year Permit Review, confirming that a Permit Revision was necessary. The final permit revision details will be updated through revision of the JTD, scheduled for 2022-2023.

Lone Pine Landfill

The Lone Pine Landfill was established in 1965 to serve the disposal needs of the residents of Lone Pine, California and the surrounding communities including Alabama Hills and Pangborne. It is designated by the state of California as a Class III disposal site, accepting only non-hazardous municipal solid waste. Daily operations are conducted in compliance with state minimum standards and an average of 8-14 tons of waste are accepted per operating day for disposal (based on 2021-22 quarterly reports).

The Lone Pine Landfill is leased (the most current lease has expired and is now in "holdover" status) to Inyo County by LADWP. The Lone Pine Landfill is located approximately 0.5 mile southeast from the Lone Pine Indian Reservation and the unincorporated community of Lone Pine, it is a little over a mile east of Highway 395 and is accessed via Substation Road. The general location of the landfill is presented in Figure 1. Figure 7 shows the site with more detail including lease boundary, waste footprint, current lease boundary, site facilities and monitoring network.

Current water use on the site is limited to dust abatement activities, through the use of water trucked onto the site as-needed from the existing Lone Pine town water supplies. Approximately 6,000 gallons per operating day are currently used on-site. When an on-site supply well is installed, it would likely be located near the landfill entrance and uses would be expanded to sanitary facilities (restroom), employee safety facilities, and fire suppression uses as necessary for continued operations of the site as a landfill.

The following site description is as described in the current WDRs for the Lone Pine Landfill. The landfill is unlined and is permitted to accept up to 22 tons of inert and non-hazardous solid waste per day from the community of Lone Pine and other nearby communities.

The site is located on a shallow alluvial floodplain of gravel, sand, silt, and clay which slopes east towards the Owens River. The Owens River is located approximately 0.1 to 0.25 miles to the east. Sections of sandy clay 4 to 5 feet thick were noted in the stratigraphic profile of shallow soils around the site (RWQCB 1995). Depth to groundwater varies across the site from approximately 17 to 42 feet below ground surface. Groundwater beneath the landfill generally flows east toward the Owens River at a gradient of approximately 37 feet per mile, based on the WDRs.

There is no perennial surface water flow at the landfill. The land uses at and surrounding the landfill consists of the following: various maintained residences and commercial buildings in the community of Lone Pine; open desert land; riparian and wildlife habitat of the Owens River; and agricultural uses.

The current detection monitoring program requirements are outlined in the WDRs and associated MRP. The Water Quality Protection Standard for the landfill consists of constituents of concern, monitoring parameters, monitoring points, point of compliance and concentration limits. The monitoring parameters for the landfill are chloride, sulfate, nitrate as nitrogen, TDS and VOCs as defined by Appendix I of 40 CFR Part 285. Wells MW-2, MW-3 and MW-4 are utilized as monitoring points for detection monitoring at the point of compliance. Well MW-1 was considered the background monitoring point but was abandoned and replaced with new background monitoring well MW-1R in December 2021. Well locations are indicated on Figure 4. Regulatory concentration limits for organic compounds are considered to be the laboratory detection limit. Regulatory concentration limits have not been determined for inorganic parameters. Intra-well statistics are used to establish suggested control limits for the inorganic data.

An Evaluation Monitoring Work Plan (EMP) was completed by Carlton Engineering (Carlton 2009b). Installation of two off-site groundwater monitoring wells, as proposed by the EMP, was conducted in August 2010. Groundwater sampling is conducted semi-annually under the current EMP, with semi-annual reports due in January and July, and an annual report due every June 30.

During December 2021, a new background monitoring well (MW-1R) was installed, and the original background monitoring well MW-1 was abandoned at the Lone Pine Landfill.

A SWFP revision application, including a revised JTD prepared by Geo-Logic Associates, was submitted by Inyo County to LADWP for signature in June 2015 after several rounds of LADWP and agency review. The permit revision packet had been accepted as complete by the Inyo County Environmental Health Department serving as the LEA, but was never signed by the landowner LADWP so was not processed by CalRecycle through the issuance of an

updated SWFP. In 2018, the LEA completed a 5-year Permit Review, confirming that a Permit Revision was necessary. The final permit revision details will be updated through revision of the JTD, scheduled for 2022-2023.

Violations and Groundwater Contamination

In the past, the County has been cited by CalRecycle for violations of its SWFPs, largely in relation to the need to update the SWFPs to current waste disposal rates and reflect new regulations applicable to unlined landfills in California. In response, the County has taken steps to avoid future violations of the SWFPs, including preparing Permit Revision applications, as requested by the LEA and CalRecycle, and approved by LRWQCB but never processed due to LADWP refusal to sign the SWFP revision applications. Inyo County has also taken other measures to prevent future tonnage violations, by modifying operation schedules and acceptance of commercial waste. Also, each of the County's landfills were temporarily listed on the "Inventory of Solid Waste Facilities that Violate State Minimum Standards." In each instance, the County took corrective action and the landfill was removed from the Inventory. The LEA and CalRecycle regularly conduct inspections and, if a violation is found, it is noted in an inspection report and the County corrects the problem. In the few instances where the County did not respond adequately in a timely manner, CalRecycle issued a notice of violation, the County took the required action to respond to the notice, and CalRecycle rescinded the notice.

With respect to historic violations concerning water quality, the WDRs for each site are administered by the LRWQCB with self-reporting of violations through semi-annual groundwater monitoring reports. Water quality objectives are currently exceeded at each of the existing landfills, which is part of the baseline condition and an unavoidable impact of unlined solid waste facilities. Recent monitoring reports for the Bishop Landfill have shown the presence of volatile organic compounds (VOCs) in the groundwater, with upgradient wells consistently exceeding the Maximum Contaminant Level (MCL) for PCE in drinking water. Several other VOCs are detected in site wells at levels below MCLs yet above laboratory detection limits. In 2011, the LRWQCB issued a Notice of Violation to the County as a result of the VOCs in the groundwater and directed the County to prepare a Corrective Action Plan (CAP) to remediate the VOCs. The County subsequently prepared a CAP which was accepted by the Lahontan Board in January 2013, implemented in 2015 through construction of landfill gas extraction wells, and continues to be operated and reported in compliance with the WDRs and LRWQCB direction. There have been no recent violations due to VOCs in point-of-compliance wells (down-gradient of waste limits) since corrective action activities have been implemented. However, it should be noted that upgradient wells intended to be representative of background water quality remain impacted by numerous VOCs, some of which are not present in wells down-gradient of waste, thus additional sources of VOCs from adjacent industrial uses have not been precluded. With the acquisition of the property, detections of VOCs in groundwater are not anticipated to be improved nor worsened, as the conditions of the current WDRs will continue to be followed by Inyo County under the regulatory oversight of the LRWQCB.

With respect to the Independence and Lone Pine Landfills, recent Semi-Annual Groundwater Monitoring Reports for the Independence and Lone Pine Landfills observe that VOCs are detected in some monitoring wells at the landfills, at trace to low concentrations (generally less than 2 ug/L). Independence Landfill is in a detection monitoring program to monitor these limited impacts, and Lone Pine Landfill is in an Evaluation Monitoring Program which includes monitoring for VOC impacts in off-site monitoring wells. The VOCs in groundwater beneath these sites exceed water quality objectives, but are not subject to current violations from the LRWQCB due to Inyo County following the provisions of the respective WDRs. Even though a regulatory standard has not been exceeded at these wells, the County is committed to continue monitoring and to take action should the monitoring reveal that such action is necessary (at the discretion and direction of the LRWQCB).

The robust regulatory process conducted by the LEA, CalRecycle and the LRWQCB will continue and the County will continue to take action as necessary to correct any violations and prevent the contamination of groundwater regardless of whether the County is the lessee or the owner of the landfills.

Environmental Setting

The Owens Valley, which comprises a large portion of the County, is characterized by hot, dry summers with temperatures as high as 110 degrees Fahrenheit (° F) and moderately cold winter lows of 2 ° F. The Sierra Nevada Mountains casts a rain shadow resulting in low precipitation over the area. Above 10,000 feet, the majority of precipitation falls as snow and averages 30 inches (in snow-water equivalent). In the Owens Valley, average precipitation is 4 to 6 inches; in the White Mountains and Inyo Mountains precipitation ranges from 7 to 10 inches. Most precipitation falls between December and February. Winds in this region are known to reach as high as 75 miles per hour. The open water potential evaporation rate is estimated to be between 65 and 80 inches per year in the Southern Portion of the County (State Water Resources Control Board [SWRCB] 1993; Bauer 2002).

Air quality in a given location is determined by the concentration of various pollutants in the atmosphere. Specific geographic areas are classified as either attainment, maintenance, or nonattainment for each criteria pollutant based on a comparison of measured air quality data with relevant federal and state air quality standards. Attainment areas include areas that meet the relevant primary or secondary ambient air quality standards for each criteria pollutant, while nonattainment areas include areas that do not meet the standards or that otherwise contribute to or affect ambient air quality in nearby areas that are not in attainment. A nonattainment area can reach attainment when a State Implementation Plan (SIP) has been adopted and National Ambient Air Quality Standards (NAAQS) have been met. During this time, the area is designated as maintenance area from the effective date of the SIP for a probationary period of two consecutive 10-year terms. The County, which is located in the GBUAPCD, is designated as a nonattainment area in the Owens Valley area for particulate matter less than 10 micrometers in diameter (PM₁₀) (U.S. Environmental Protection Agency [USEPA] 2018). All other criteria pollutants are currently within attainment in the areas in proximity to the Bishop, Independence, and Lone Pine Landfills (USEPA 2018).

The Bishop–Sunland Landfill is located approximately 2 miles south of the town of Bishop, California. It is to the west of Highway 395 with the site accessible from Sunland Reservation Road. The site is at approximately 4,150 feet above mean sea level. There is agricultural land to the north which is currently used for alfalfa production. The site is mostly bare soil and is devoid of undisturbed native vegetation. Surrounding vegetation includes Rabbitbrush/Sagebrush scrub. There are no surface water features at the site. LADWP conveyance ditches exist 0.25 miles to the north (a–drain) and the Bishop Creek Canal approximately 0.5 miles to the east. No wetlands have been identified at or in close proximity to the landfill.

The Independence Landfill is approximately 1 mile southeast of the unincorporated community of Independence. The site is to the east of Highway 395 with the site accessible from Dump Road. The site is at about 3,930 feet above mean sea level. The site is mostly bare soil and is devoid of undisturbed native vegetation. It is surrounded by saltbush scrub habitat which is crisscrossed by a number of roads. There are no surface water features on site. Symmes Creek is about 0.6 miles to the south of the landfill with the Los Angeles Aqueduct approximately 0.8 miles to the east. No wetlands have been identified at or in close proximity to the landfill.

The Lone Pine Landfill is located approximately 0.5 miles southeast from the Lone Pine Indian Reservation and the unincorporated community of Lone Pine. The site is to the east of Highway 395 and is accessible from sub–station road. The site is at approximately 3,730 feet above mean sea level. The site is mostly bare soil and is devoid of undisturbed native vegetation. It is surrounded by alkali scrub/saltbush scrub habitat. There are no surface water features on site. The Owens River is less than 0.10 miles to the east of the landfill. No wetlands have been identified at the landfill. However, wetlands occur to the East of the Lone Pine Landfill as shown in Appendix B.

Special–Status Species

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

Several federally listed and state–listed fish and wildlife species occur within the County and have the potential to occur within the areas affected by the Inyo County Landfills. See Appendix C for tables of special status species that have the potential to occur at and around the landfill sites. This list was based on a CNDDDB search for the Bishop U.S. Geological Survey (USGS) 15–minute quadrangle map for the Bishop–Sunland Landfill, the Independence

quadrangle map for the Independence Landfill and the Lone Pine quadrangle map for the Lone Pine Landfill. No impacts are expected to these species as a result of the proposed project as the sites are completely disturbed and have no streams, lakes, riparian or wetland habitat available. A depiction of the CNDDDB output for each site overlaid on aerial imagery has also been provided in Appendix C.

5.0 CRITERIA FOR EVALUATION OF ENVIRONMENTAL IMPACTS – INITIAL STUDY CHECKLIST

The environmental evaluation process, as presented in the following checklist, considers the proposed project conditions such that the maximum potential environmental effects can be determined. The purpose of the evaluation and checklist is to identify any potentially significant impacts the project may have on the environment, and discuss applicable mitigation measures. Responses are substantiated by summarizing the assessment of significant impacts, and referencing documents utilized in research. Below is a description of the definitions and specifics that guide the evaluation process.

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the existing information sources.
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
 - a. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (CEQA Guidelines Section 15063[c][3][D]). In this case, a brief discussion should identify the following:
 - Earlier Analysis Used. Identify and state where they are available for review.
 - 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.
- 5) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question.
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

6.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by Inyo County's proposed Acquisition of Fee Title for Three Properties for Continued Operation of Bishop-Sunland, Independence, and Lone Pine Landfills, involving at least one impact that is a "Potentially Significant Impact," "Less than Significant with Mitigation Incorporated," or with the potential to have indirect or cumulative impacts that are potentially significant, as indicated by the checklist and discussed in Section 8, *Environmental Impacts Checklist*.

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

7.0 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 although the proposed project could have a significant effect on the environment, the proposed Project will not cause a significant effect because mitigation measures are incorporated that reduce impacts to a less-than-significant level. Potential significant effects on the environment from the County's operation of the landfills have been adequately analyzed in an earlier document pursuant to applicable legal standards, and have been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is not required, but will be prepared out of an abundance of caution. The EIR will analyze only the potential environmental 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.

County of Inyo
Department of Public Works



John Pinckney
Deputy Director – Public Works

8.0 ENVIRONMENTAL IMPACTS CHECKLIST

This checklist identifies potential environmental impacts that could result from the implementation of the proposed acquisition of fee title for continued operation of the three County landfills. The discussion goes on to describe the scope of the environmental impact analysis to be provided in the EIR.

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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

a) **Less than Significant Impact.** The potential for impacts to aesthetics and visual resources associated with the continued operation and eventual closure of the landfills, were previously analyzed in the 1999 MNDs for the three landfills. Each of these MNDs determined that the operation and eventual closure of the landfills would not result in significant environmental impacts. Under the proposed Project, any vertical expansion of the landfills would continue to be limited by slope stability standards and permit conditions, and would result in a less than significant impact on scenic vistas (e.g., Sierra Nevada or White-Inyo Mountains).

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

c) **Less than Significant with Mitigation Incorporated.** Under the proposed Project, the landfills would have the same visual character as the existing sites and their surroundings.

Continued operation of the landfills may result in impacts to aesthetics and visual resources during active filling operations, as described in the 1999 MNDs. Mitigation measures to address these potential impacts include daily, intermediate, and final cover of waste, and control of wind-blown trash, which are currently implemented by the County as the operator of the landfills and would continue to be implemented by the County under the proposed Project. Following closure of the landfills, the sites would be reclaimed according to approved closure plans. As described in the 1999 MNDs, vertical expansion of the three landfills would be limited to the approved site grading and closure plans. With these mitigation measures, continued operation of the landfills under County ownership would be less than significant.

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

II. Agriculture and Forestry Resources

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| Would the Project: | | | | |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

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

III. Air Quality

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. | | | | |
| Would the Project: | | | | |
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <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 in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

DISCUSSION

a) **Less than Significant Impact.** The Independence and Lone Pine Landfills are located within the Owens Valley PM₁₀ SIP boundaries. (GBUAPCD 2022). Continued operation of the landfills is not expected to increase PM₁₀ emissions beyond existing levels. In addition, obtaining ownership of the landfills will enable Inyo County to develop on-site water supplies at the Independence and Lone Pine Landfills, which could enable further reduction of PM₁₀ emissions through more consistent application of water for dust-abatement during operations. Therefore, the acquisition and continued operation of the landfills under the proposed Project would not conflict with or obstruct the SIP.

b) **Less than Significant Impact.** Inyo County, which is located within the GBUAPCD, is designated as a nonattainment area in the Owens Valley Dry Lake area for PM₁₀ (USEPA 2022). Implementation of the proposed Project would result in the continued operation of the existing landfills in compliance with applicable laws, regulations and permits for solid waste facilities. There would be no changes in operational air emissions, including fugitive dust, treatment system emissions, and equipment emissions. Operations of the landfill typically incorporate all reasonable precautions required by the GBUAPCD (e.g., Rule 401 – Fugitive Dust). As such, emissions would not approach the NAAQS established by the USEPA or the California Ambient Air Quality Standards (CAAQS) established by the California Air Resources Board (CARB). However, it should be noted that the Independence and Lone Pine Landfills currently do not have a water supply well for on-site operations and dust control, water must be trucked to the site. With acquisition of fee title by Inyo County, the County will develop on-site water sources at the Independence and Lone Pine Landfills to more effectively mitigate PM₁₀ emissions. Quantity of water needed for dust-control (at 2,000 gallons per truck-load) is not anticipated to increase substantially with on-site sources, but would increase the reliability and timeliness of water applications during wind events.

c) **Less Than Significant With Mitigation Incorporated.** Inyo County, located in the GBUAPCD, is designated as a nonattainment area in the Owens Valley area for PM₁₀, primarily due to dust from the Owens Lake. PM₁₀ is the pollutant, and dust control measures are intended to reduce the net increase of PM₁₀. The Independence and Lone Pine Landfills do not have an on-site source of water, and are reliant on trucking water from an off-site source. It is unclear whether this mitigation measure is effective at reducing the cumulative net increase of PM₁₀ to a less than significant level, thus it will be analyzed further in an EIR. In addition, the venting of Landfill Gases (LFG) is an active corrective action mechanism at Bishop-Sunland, and a foreseeable corrective action mechanism at Independence and Lone Pine Landfills. When LFG venting occurs, the vents are subject to a Permit to Operate issued by the GBUAPCD with filtration to remove volatile organic compounds, where necessary. The EIR will review whether additional mitigation measures are necessary to minimize the impacts to air quality due to continued operation of these landfills.

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

e), **Less than Significant Impact.** Existing septage ponds at each of the three landfills cause odor. Additionally, methane is extracted and vented to the environment at the Bishop-Sunland Landfill. However, each of the existing landfills is located in areas of limited development in unincorporated areas of the County. A previously, described no sensitive receptors are located within close proximity to these ponds. Additionally, the application of daily cover, as required by CalRecycle and permit conditions, generally acts to suppress objectionable odors.

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 Wildlife 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 Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 wetlands, etc.), through direct removal, filling, hydrological interruption or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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"/> |

DISCUSSION

a) **Less than Significant Impact.** No species that is listed as a candidate, sensitive, or special status species are expected to be impacted by the proposed Project. Appendix C lists the species with the potential to occur at each of the landfill sites based on previous occurrence. However, due to the disturbed nature of the landfills, lack of mature native vegetation and

absence of riparian habitat or surface water it is unlikely that any of these species would find suitable habitat at any of these sites.

b, c) **No Impact.** No surface water, wetlands or riparian habitat or other sensitive natural communities occur on the landfills or in the immediate vicinity. The Owens River occurs 0.1 to 0.05 miles from the Lone Pine Landfill. National Wetland Inventory Maps can be found in Appendix B, sensitive natural communities in proximity to the landfills are listed in Appendix C.

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

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

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

V. Cultural Resources

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| Cultural Resources | | | | |
| Would the Project: | | | | |
| a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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) Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

DISCUSSION

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

potential remains for currently buried, unknown cultural resources to be uncovered when uncovering new fill material. However, implementation of standard avoidance and minimization measures would ensure no significant impacts would result from the landfill operations. Therefore, operational impacts to cultural resources would be less than significant.

VI. Energy

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| Would the Project: | | | | |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

a, b). **No Impact.** The proposed acquisition and continued operation of the three landfills would not affect energy usage associated with the existing landfills.

VII. 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ii) Strong seismic ground shaking? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| iii) Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iv) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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"/> |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| 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 type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

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

At the Bishop–Sunland Landfill a fault is identified to cross the eastern portion of the site. The proposed Project would neither increase nor decrease the risk of a fault rupture. The 1999 MNDs established mitigation measures to reduce the risk to humans or structures (to a less-than-significant level) in the event that the active fault across the site ruptures. The mitigation measures were established to be the following:

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

Although these mitigation measures were deemed sufficient in the previous MNDs, and required to be implemented over the active life of the landfill, the mitigation measures may need to be re-assessed with updated fault location information. In 2019, Geo-Logic Associates prepared a "Site Response and Seismic Deformation Analysis, and in 2021, a "Postulated Fault Rupture Impact Evaluation Report" for the Bishop-Sunland Landfill. The updated information provided in those reports, and a review of mitigation measures to reduce impacts from seismic activity, will be evaluated in the EIR.

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

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

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

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

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

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

VIII. Greenhouse Gas Emissions

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| Would the Project: | | | | |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

DISCUSSION

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

The California Global Warming Solutions Act of 2006, known as Assembly Bill (AB) 32 became effective in 2010. The regulation requires the installation and proper operation of gas collection and control systems at active, inactive, and closed Municipal Solid Waste (MSW) landfills having 450,000 tons of waste-in-place or greater that received waste after January 1, 1977; unless exemption conditions have been met. At a minimum, AB 32 requires the annual reporting of a waste-in-place report. Independence and Lone Pine Landfills are well below the threshold for further analysis, but Bishop-Sunland requires an annual Landfill Gas Heat Input Report due to having more than 450,000 tons of waste-in-place. The calculated heat capacity value has been less than the regulatory trigger of 3 Metric Million British Thermal Unit (MMBtu) / hour for further control actions at the site. Since continued operation of the landfill assumes the waste-in-place volumes continue to increase, the proposed Project has the potential to require additional mitigation measures to minimize the impact of GHG emissions, and will be further analyzed in the EIR.

b) **Less than Significant Impact.** The continued operation of the landfills would not conflict with any applicable, plans, policies, or regulations. AB 32 is the primary regulation regulating GHG at municipal landfills. Cumulative impacts could require compliance with additional prevention measures once certain thresholds are met.

IX. 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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 type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area? | <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 type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

a, b) **Less than Significant with Mitigation Incorporated.** Disposal of hazardous materials is strictly prohibited by permit conditions for the three Inyo County Landfills. Mitigation

measures identified in the 1999 MNDs (summarized in Table 1) have been implemented to detect and discourage hazardous waste disposal, including gate attendants and a load checking program. The Bishop–Sunland Landfill accepts non–friable asbestos for disposal under specific state permit requirements issued by the LRWQCB. Septage is randomly sampled and is also sampled before disposal. Landfill operation activities would continue to require short–term use of heavy construction equipment involving limited quantities of potentially hazardous materials, including transportation and use of fuel, oil, and other common hazardous materials. Short–term uses of limited quantities of hazardous materials would continue to be confined to the landfill lease areas. The use of potentially hazardous materials would be regulated by health and safety requirements under federal, state, and local regulations, including handling, storage, and disposal of the materials, as well as emergency spill response.

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

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

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

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

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

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

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

h) **No Impact.** The existing landfills are located in relatively undeveloped areas of unincorporated Inyo County. The large areas of bare soil cover on site surfaces and roads should inhibit rather than enhance fire propagation. The continued operation of the landfills by the County under the proposed Project would not increase or otherwise affect wildfire risk.

X. Hydrology and Water Quality

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| Would the Project: | | | | |
| a) Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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 type="checkbox"/> | <input checked="" 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 that 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 storm water drainage systems or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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 type="checkbox"/> | <input checked="" type="checkbox"/> |
| h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

a) **Less than Significant with Mitigation Incorporated.** LRWQCB has issued WDRs, which include quarterly monitoring and reporting programs for each of the landfills. Inyo County operates these three existing facilities in compliance with these Waste Discharge Requirements, with semi-annual compliance reporting to the RWQCB. The Bishop-Sunland and Lone Pine landfills currently exceed water quality standards for Volatile Organic Compounds (VOCs), which according to the WDRs has elevated these sites to Corrective Action and Evaluation Monitoring Programs, respectively. Monitoring programs and mitigation measures required in the 1999 MNDs are in place and are currently being implemented by the County to minimize impacts (See Table 1). Mitigation includes load checking, application and compaction of daily cover soil, grading surfaces to promote lateral drainage and active vents to reduce impacts from landfill gas to groundwater. With the proposed Project (acquisition of fee title and continued operation), water quality objectives would continue to be exceeded, monitored, and addressed according to the active WDRs. However, with the ownership of fee title for these properties, Inyo County would be able to more effectively work with the RWQCB to update and prove compliance with the WDRs, as well as implementing appropriate corrective actions if necessary, without the burden of the current LADWP lease terms. As unlined, Class III landfills, impacts to groundwater by VOCs and other regulated compounds could be considered an unavoidable impact of continued landfill operations. The significance of this impact is dependent on implementation of key mitigation and corrective action measures over the life of the landfills and for a 30-year post-closure period. Due to this dependency on mitigation measures to be less than significant, as well as the potential for cumulative impacts to groundwater over the life of the landfills, the impacts will be further reviewed in the EIR.

b) **No Impact.** Groundwater production to supply water used on the site is proposed as part of the Project at the Independence and Lone Pine landfill sites. The source of water used at these facilities is proposed to shift from groundwater pumped to supply the town water systems and trucked to sites, to groundwater pumped from a new well on the Independence site and a new well on the Lone Pine site. No significant increase in the amount of groundwater pumping is proposed. It not expected that the limited use of groundwater produced on-site will not impact regional supply wells, LADWP production wells or groundwater dependent resources, but the impacts of groundwater pumping from the two new wells will be fully analyzed in the EIR.

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

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

f) **Less than Significant Impact with Mitigation Incorporated.** There is the potential for leachate and landfill gas to impact groundwater, as discussed about in item X.a. However, the landfills are subject to Waste Discharge Requirements issued by the LRWQCB. A quarterly monitoring and reporting program has been implemented at the landfill. Mitigation measures have been implemented to minimize the potential for leachate and landfill gases to impact groundwater at the landfills. The Bishop–Sunland Landfill has one or more monitoring wells which exceed Maximum Contaminant Levels (MCLs) for Drinking Water, most notably the wells in a hydraulically up-gradient direction (West) from the landfill which could indicate other sources of contamination. Bishop–Sunland is also under an active Corrective Action Program, with venting of landfill gas the primary mechanism to reduce VOCs in groundwater. The significance of this impact is dependent on implementation of key mitigation and corrective action measures over the life of the landfills and for a 30-year post-closure period. Due to this dependency on mitigation measures to be less than significant, as well as the potential for cumulative impacts to groundwater over the life of the landfills, the impacts will be further reviewed in the EIR.

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

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

XI. 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

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

b) **Less than Significant Impact.** The operation of the three lands was previously evaluated in the 1999 MNDs, and the change in ownership is not anticipated to have a significant impact on Land Use or Planning in Inyo County. Existing and continued landfill operations are in compliance with the County General Plan; however, rezoning and issuance of a CUP for each site may also be necessary to remain in compliance. These anticipated zoning and land use changes are described above in the Detailed Project Description, and are not considered an adverse impact to the environment.

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

XII. Mineral Resources

| | Potentially Significant Impact | Less Than Significant With 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

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

b) **No Impact.** No locally important mineral resource recovery sites are identified on the existing landfills. Each of the existing landfills is in compliance with the County General Plan and is consistent with surrounding land uses (or will be with zoning changes)

XIII. 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 of 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 type="checkbox"/> | <input checked="" 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"/> |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

a, c, d) **Less than Significant.** The continued operation of the three landfills would not result in increases in noise levels. The County would continue to ensure operational activities are conducted in compliance with Policy NOI-1.7 in the Public Safety Element of the 2001 Inyo County General Plan (Inyo County 2001). For example, in accordance with Implementation Measure 5.0, landfill operation activities would be limited to the hours 7:00am and 7:00pm to avoid noise impacts to sensitive receptors within 500 feet of maintenance activities. Consequently, noise generated during routine maintenance activities would not substantially affect the current ambient noise level in the vicinity. There are no residences within 0.75 miles of the Bishop–Sunland Landfill, within 1 mile of the Independence Landfill, and within 0.15 miles of the Lone Pine Landfill.

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

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

XIV. Population and Housing

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| Would the Project: | | | | |
| a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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"/> |

DISCUSSION

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

XV. Public Services

| | Potentially Significant Impact | Less Than Significant with 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 type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

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

e) **No Impact.** The proposed Project would include acquisition and continued operation of the three landfills. The continued operation of the landfills would ensure that solid waste services in the County would continue in compliance with current regulations under the authority of

three primary permitting agencies: 1) Inyo County Environmental Health Department, serving as LEA; 2) CalRecycle; and 3) LRWQCB.

XVI. 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 type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Substantially conflict with the area's established recreational uses? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

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

XVII. Transportation

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| Would the Project: | | | | |
| a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

a-f) **No Impact.** Traffic volume and patterns related to the proposed Project would generally remain similar to existing conditions. Inyo County has no current plans to change operating days or hours so no impacts or change to impacts from current conditions are expected as a result of the proposed Project.

XVIII. Tribal Cultural Resources

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| Would the Project: | | | | |
| a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| i) Listed or eligible for listing in the California register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a, i, ii) **Less Than Significant Impact.** The Patsiata (Owens Lake) Historic District is eligible for listing in the California Register of Historical Resources as a Traditional Cultural Landscape, and the boundaries of the proposed historic district include the Lone Pine Landfill. Impacts to the proposed District as a result of the proposed project are not anticipated, due to the fact that there are no proposed changes to the existing landfill facility. The Lone Pine Landfill is not considered to be a contributing resource to the tribal cultural resources that make up the proposed historic district.

AB 52, passed in September 2014, has added several sections to the Public Resources Code (PRC) which pertain to tribal cultural resources and a formal consultation process. The primary purpose of consultation and the changes to CEQA under AB 52 is to allow tribes, who may have “expertise in tribal history and tribal knowledge about land and tribal cultural resources at issue” to be included in environmental assessments for projects that may have a significant impact on those resources. As of July 1, 2015, PRC Section 21080.3.1 and Section 21080.3.2 require public agencies to consult with California Native American tribes identified by the NAHC for the purpose of mitigating impacts to tribal cultural resources. On February 1, 2022, Inyo County sent letters inviting formal tribal consultation to the eight tribal governments identified by the NAHC as having traditional lands or cultural places located within the boundaries of the County, through direct mailing in accordance with the Inyo County Tribal Consultation Policy. No formal requests for tribal consultation were received in response to the notification, which included the NOP and Notice of Public Scoping Meeting. If any tribes request consultation, subsequent to the review of this IS, it will be discussed further in the EIR. The County has complied with the requirements of AB 52 during the NOP process, and the proposed change in land ownership for continued landfill operations is not anticipated to impact any known tribal cultural resources to a level of significance.

XIX. 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 type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" 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 that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Comply with federal, state and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

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

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

d) **Less Than Significant Impact.** The Bishop–Sunland Landfill would have sufficient water supplies available because the current proposed Project would include acquisition of the current supply well that supplies water for on–site uses. New wells at the Independence and Lone Pine Landfills will be required as a part of this proposed project. It is not expected that the limited use of groundwater produced on–site will impact regional supply wells, LADWP production wells or groundwater dependent resources, but such potential impacts will be fully analyzed in the EIR.

e, f, g) **No Impact.** The continued operation of the existing landfills would comply with all applicable regulations related to solid waste at the federal, state, and local level. Acquisition of the landfills by the County would ensure that the County has the ability to continue to meet all permit requirements. The proposed Project would not negatively impact the waste management structure of Inyo County, rather, it would ensure the continued availability of solid waste disposal facilities within the region.

XX. Wildfire

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| Would the Project: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: | | | | |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff post–fire slope instability or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

a, b, d) **No Impact.** The acquisition and continued operation of the existing landfills would not result in any new ignition sources or otherwise, and no changes to operations are considered which would increase the risk of wildfire above existing conditions. Financial assurance mechanisms are required for the landfills, through non–water release corrective cost estimates

that include wildfire damage to the landfills as a potential causal event. The landfills are mostly devoid of vegetation and thus should reduce fire risk due to lack of combustible material at the project locations.

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

XXI. Mandatory Findings of Significance

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|-------------------------------------|--|-------------------------------------|--------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

DISCUSSION

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

b) **Potentially Significant Impact.** The proposed project is primarily an ownership change, with no significant operational changes proposed which will cause immediate, direct physical impacts beyond the baseline conditions. However, the project also includes the continued operation of these three sites as landfill facilities for long-term operational periods, plus a pre-defined closure and post-closure period. Therefore, there is the potential for cumulative impacts to the environment that should be considered in the EIR. In addition, cumulative impacts will depend in part on the effective implementation of mitigation measures and minimization measures over the life of the facilities. The environmental categories that are either dependent on mitigation measures to remain less than significant, or with the potential for indirect impacts to be cumulatively considerable, are the following: Aesthetics, Air Quality, Geology/Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, and Hydrology/Water Quality.

The detailed SWFPs are required to be reviewed every five years, with revisions directed by the Responsible Agencies involved. The EIR will evaluate feasible project alternatives, and the evaluation of alternatives will need to address potential cumulative impacts from the project alternatives identified. For example, filling the landfills to capacity more quickly than predicted, or extending the life of the landfills through other means, could impact the environmental effects of the project. Although the planned operation of these facilities would be very similar under lease conditions vs with property ownership by Inyo County, the County will review project alternatives and scenarios to determine whether an environmentally superior alternative exists and is feasible to implement.

c) **Less than Significant with Mitigation Incorporated.** As described in the individual resource area analyses above, with the implementation of mitigation measures identified in the 1999 MNDs, permit conditions, and other best management practices to comply with applicable federal, state, and local regulations, the proposed acquisition and continued operation of the three existing landfills would not result in environmental effects that would cause substantial adverse effects on human beings.

9.0 REFERENCES

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ACRONYMS AND ABBREVIATIONS

| | |
|------------------|---|
| °F | degrees Fahrenheit |
| AB | Assembly Bill |
| BMP | Best Management Practice |
| CalRecycle | California Department of Resources Recycling and Recovery |
| Caltrans | California Department of Transportation |
| CAAQS | California Ambient Air Quality Standards |
| CARB | California Air Resources Board |
| CDFW | California Department of Fish and Wildlife |
| CEQA | California Environmental Quality Act |
| CFR | Code of Federal Regulations |
| CCR | California Code of Regulations |
| CNDDDB | California Natural Diversity Database |
| COC | Constituent of Concern |
| CUP | Conditional Use Permit |
| County | Inyo County |
| EIR | Environmental Impact Report |
| EMP | Evaluation Monitoring Plan |
| GHG | greenhouse gas |
| GBUAPCD | Great Basin Unified Air Pollution Control District |
| HHW | Household Hazardous Waste |
| ICEHD | Inyo County Environmental Health Department |
| ICPW | Inyo County Public Works Department |
| IS | Initial Study |
| JTD | Joint Technical Document |
| LADWP | Los Angeles Department of Water & Power |
| LEA | Local Enforcement Agency |
| LFG | Landfill Gas |
| MCL | Maximum Contaminant Level |
| MMBtu | Metric Million British Thermal Unit |
| MW | Monitoring Well |
| MRP | Monitoring and Reporting Program |
| MSW | Municipal Solid Waste |
| LRWQCB | Lahontan Regional Water Quality Control Board |
| MND | Mitigated Negative Declaration |
| NAAQS | National Ambient Air Quality Standards |
| NAHC | Native American Heritage Commission |
| NOP | Notice of Preparation |
| PCPCMP | Preliminary Closure and Post-Closure Maintenance Plans |
| PM ₁₀ | particulate matter less than 10 micrometers in diameter |

| | |
|-------|---------------------------------------|
| PRC | Public Resources Code |
| SIP | State Implementation Plan |
| SWFP | Solid Waste Facilities Permit |
| SWPPP | Stormwater Pollution Prevention Plans |
| TDS | Total Dissolved Solids |
| U.S. | United States |
| USEPA | U.S. Environmental Protection Agency |
| USGS | U. S. Geological Survey |
| USFWS | U.S. Fish and Wildlife Service |
| VOC | Volatile Organic Compound |
| WDID | Waste Discharge Identification Number |
| WDR | Waste Discharge Requirements |

TABLES

TABLE 1
Summary of Previous Analysis and Mitigation Measures

| Category | Previous Analysis in 1999 MND, 2012 Addendum | Original Mitigation Required | On-going Mitigation/Minimization | Responsible Agency | Reduction to less-than-significant? | Needs Further Analysis in EIR |
|------------------------------------|--|--|---|--------------------------------|-------------------------------------|-------------------------------|
| Aesthetics | YES | | Daily soil cover, tarps, trash control | ICEHD | Unknown | YES |
| Agriculture and Forestry Resources | YES | | | | | NO |
| Air Quality | YES | | Dust control, PTO for LFG extraction vent | GBUAPCD | Unknown | YES |
| Biological Resources | YES | | | | | NO |
| Cultural Resources | YES | | | | | NO |
| Energy | NO | | | | | NO |
| Geology/Soils | YES | Slopes designed at 4:1 per slope stability analysis, no structures within 50 feet of fault or waste limits, erosion control measures | Erosion control measures, on-site retention basin, storm water provisions. Review and update of PCPCMPs every 5 years | ICEHD, CalRecycle | Unknown | YES |
| Greenhouse Gas Emissions | NO | | | | Unknown | YES |
| Hazards and Hazardous Materials | YES | Site security, load checking programs, waste segregation and permitting | Load checking, diversion of HHW, public education, worker protection measures | ICEHD, CalRecycle, CRWQCB | Unknown | YES |
| Hydrology/Water Quality | YES | Waste Discharge Requirements, MRPs. Minimization of liquids, ponding. Daily soil cover to minimize leachate | On-going implementation of WDRs and MRPs, LFG source control (Bishop-Sunland), site grading and daily soil cover | CRWQCB, ICEHD | Unknown | YES |
| Land Use/Planning | NO | | | | | NO |
| Mineral Resources | YES | | | | | NO |
| Noise | YES | Worker protection program | Worker protection program | Inyo County Risk Manager, OSHA | YES | NO |
| Population/Housing | NO | | | | | NO |
| Public Services | NO | | | | | NO |
| Recreation | YES | | | | | NO |
| Transportation | NO | | | | | NO |
| Tribal Resources | NO | | | | | NO |
| Utilities and Service Systems | NO | | | | | NO |
| Wildfire | NO | | | | | NO |
| Mandatory Findings of Significance | NO | | | | Unknown | YES |

TABLE 2
Existing Facility Conditions

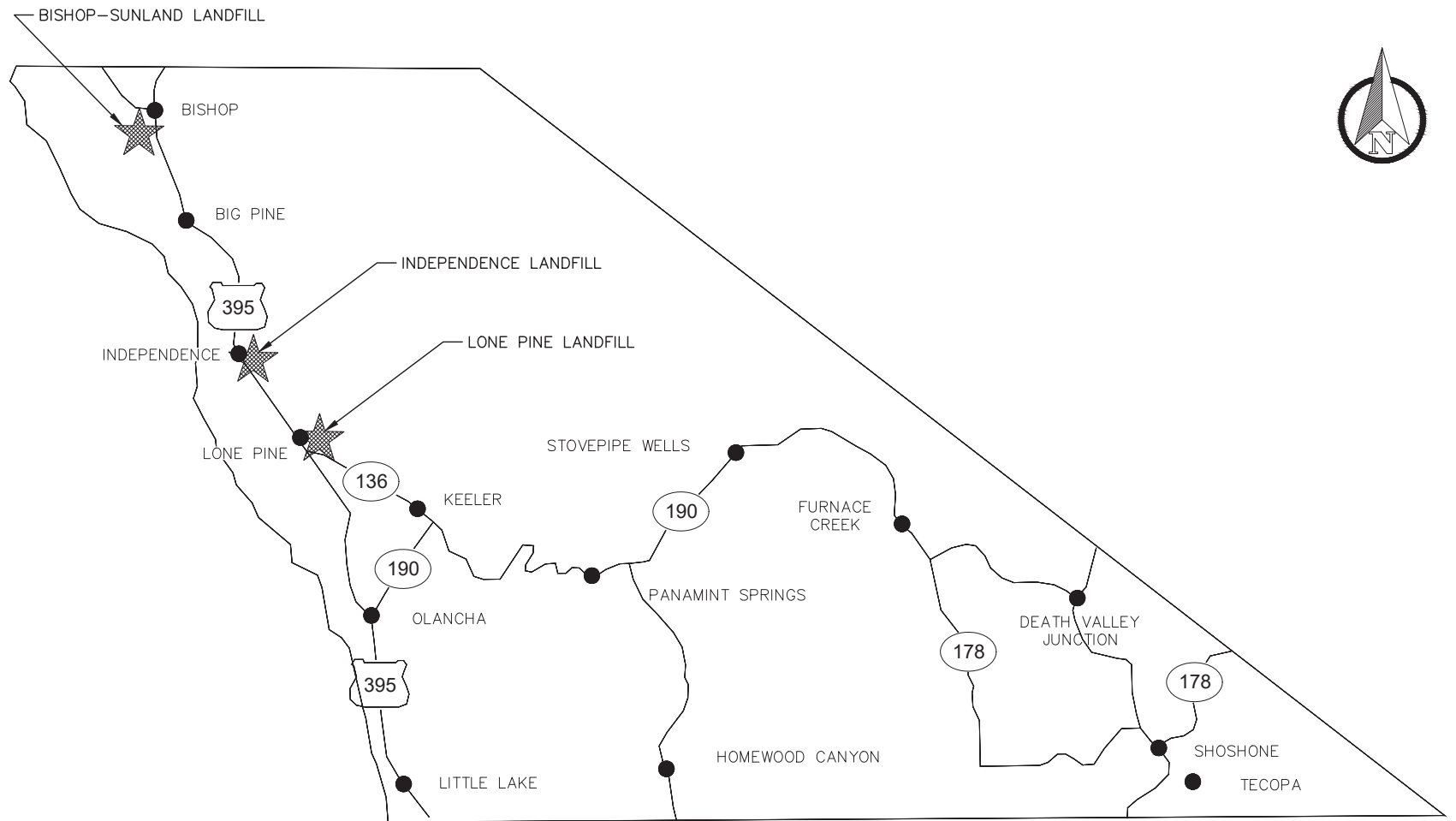
| | Bishop-Sunland Landfill | Independence Landfill | Lone Pine Landfill |
|--------------------------------------|---|---|---|
| Permitting Component | Description | Description | Description |
| SWFP Facility ID | 14-AA-0005 | 14-AA-0004 | 14-AA-0003 |
| Date of Permit | 2017 | 2000 | 2000 |
| Facility Area | 118.53 acres | 88.82 acres | 60.57 acres |
| Permitted Disposal Area (Footprint) | 75.08 acres | 14.92 acres | 26.13 acres |
| Design Capacity (cu yds) (1) | 6,016,716 | 695,679 | 1,228,988 |
| Waste-in-Place (cu yds) (2) | 2,344,515 | 489,920 | 563,174 |
| Remaining Airspace (cu yds) (2) | 3,672,201 | 205,759 | 665,814 |
| Estimated Closure Year | 2064 | 2068 | 2052 |
| Permitted Maximum Tonnage | 160 Tons per Day Total (135 TPD waste disposal, including C&D, 25 TPD re-use/recycling) | 10 Tons per Day (permit), to be revised to reflect current waste disposal rates | 22 Tons per Day (permit), to be revised to reflect current waste disposal rates |
| Waste Discharge Requirements | Board Order No. 6-01-34, WDID No. 6B140300002, MRP No. 01-34 | Board Order No. 6-95-116, WDID No. 6B140300004, MRP No. 95-116 | Board Order No. 6-95-70, WDID No. 6B140300006, MRP No. 95-70 |
| WDR Condition or Monitoring Phase | Corrective Action Program - Landfill Gas Extraction | Detection Monitoring Program | Evaluation Monitoring Program |
| Other Facility Components | Class III Asbestos Monofill, Class II Septage Ponds, Petroleum-contaminated Soil Landfarm | Waste oil, Periodic HHW Collection (with off-site disposal) | Waste oil, Periodic HHW Collection (with off-site disposal) |
| LFG monitoring wells | Perimeter wells per Title 27, LFG Extraction Vents | Perimeter wells per Title 27 | Perimeter wells per Title 27 |
| Operating Days/hours | 7 days per week, 7:30-3:30 | 2 days per week, 7:30-3:30 | 5 days per week, 7:30-3:30 |
| Maximum Vehicles-per-day (permitted) | 235 | 50 | 75 |

Notes:

- 1) Design capacities revised in 2010 to reflect accurate waste in place topographic surveys and final grades at closure
- 2) Waste in Place and Remaining Airspace, calculated through March 31, 2022. Includes waste and cover soil at waste-to-soil ratios identified in the approved Preliminary Closure and Post-Closure Plans (GLA, 2022).

FIGURES

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



INYO COUNTY
NOT TO SCALE

FIGURE 1
SITE LOCATIONS

Inyo County

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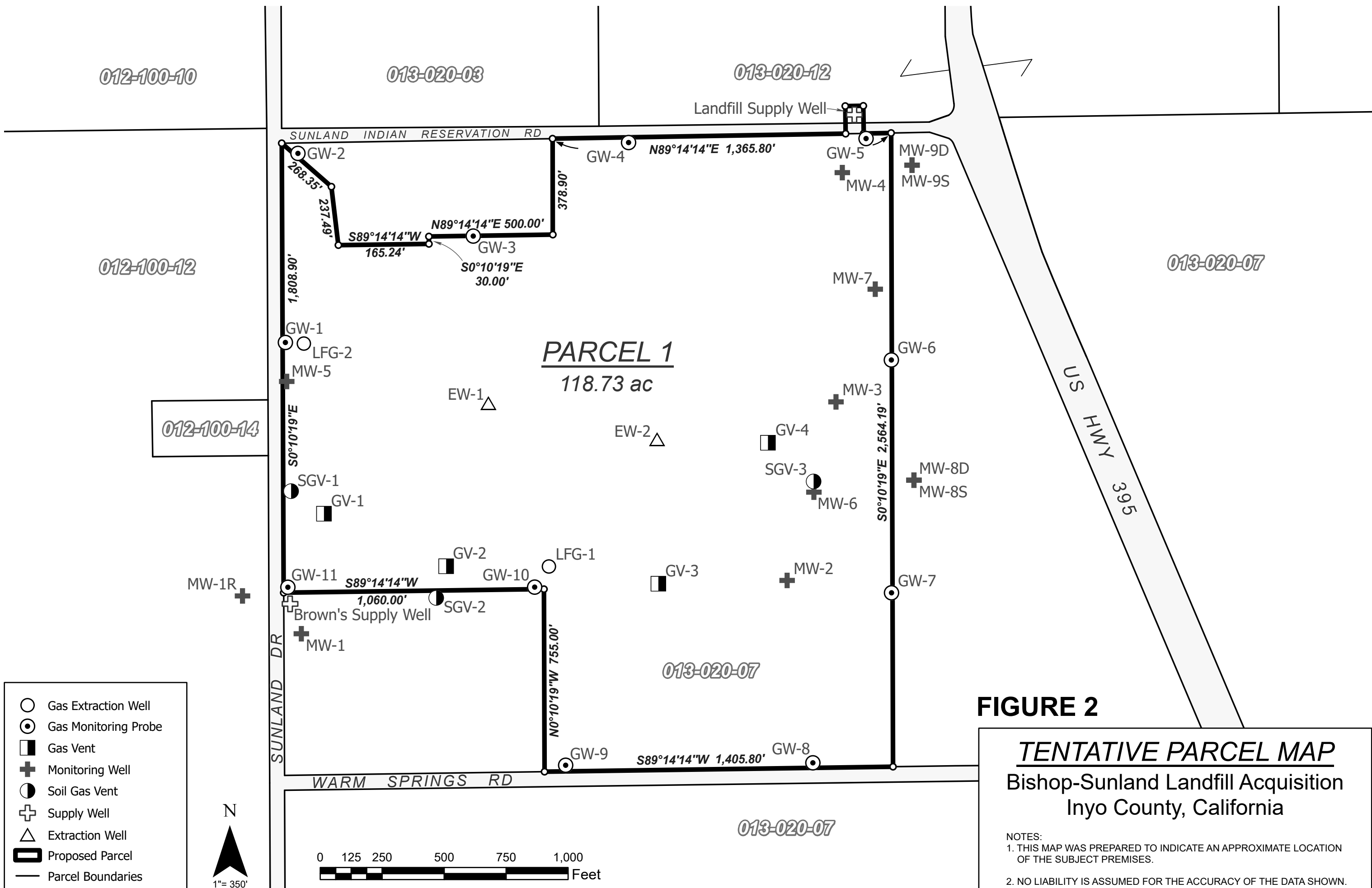
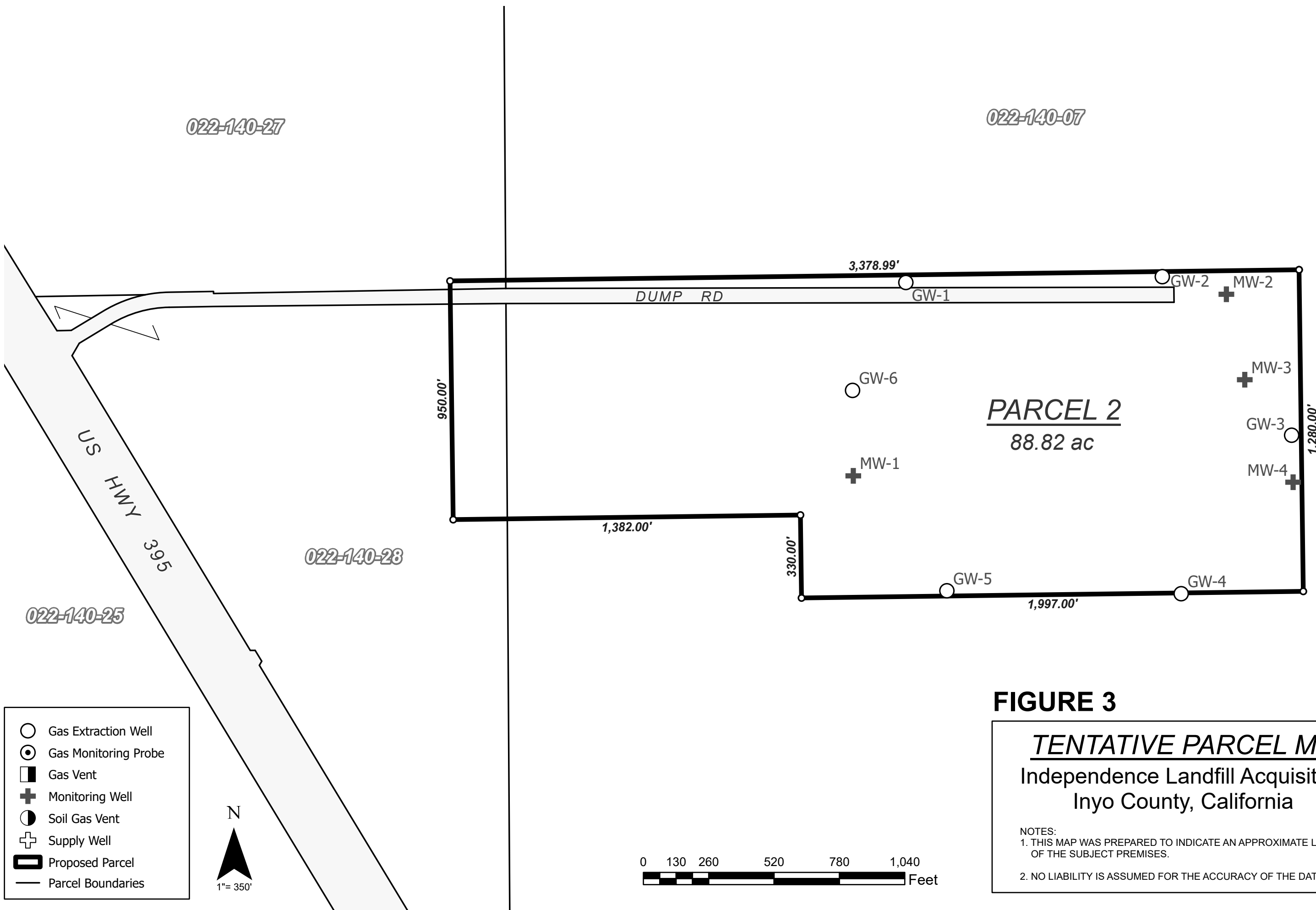


FIGURE 2

TENTATIVE PARCEL MAP
 Bishop-Sunland Landfill Acquisition
 Inyo County, California

- NOTES:
 1. THIS MAP WAS PREPARED TO INDICATE AN APPROXIMATE LOCATION OF THE SUBJECT PREMISES.
 2. NO LIABILITY IS ASSUMED FOR THE ACCURACY OF THE DATA SHOWN.



- Gas Extraction Well
- ⊙ Gas Monitoring Probe
- Gas Vent
- ⊕ Monitoring Well
- ◐ Soil Gas Vent
- ⊕ Supply Well
- ▭ Proposed Parcel
- Parcel Boundaries

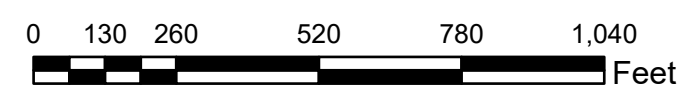
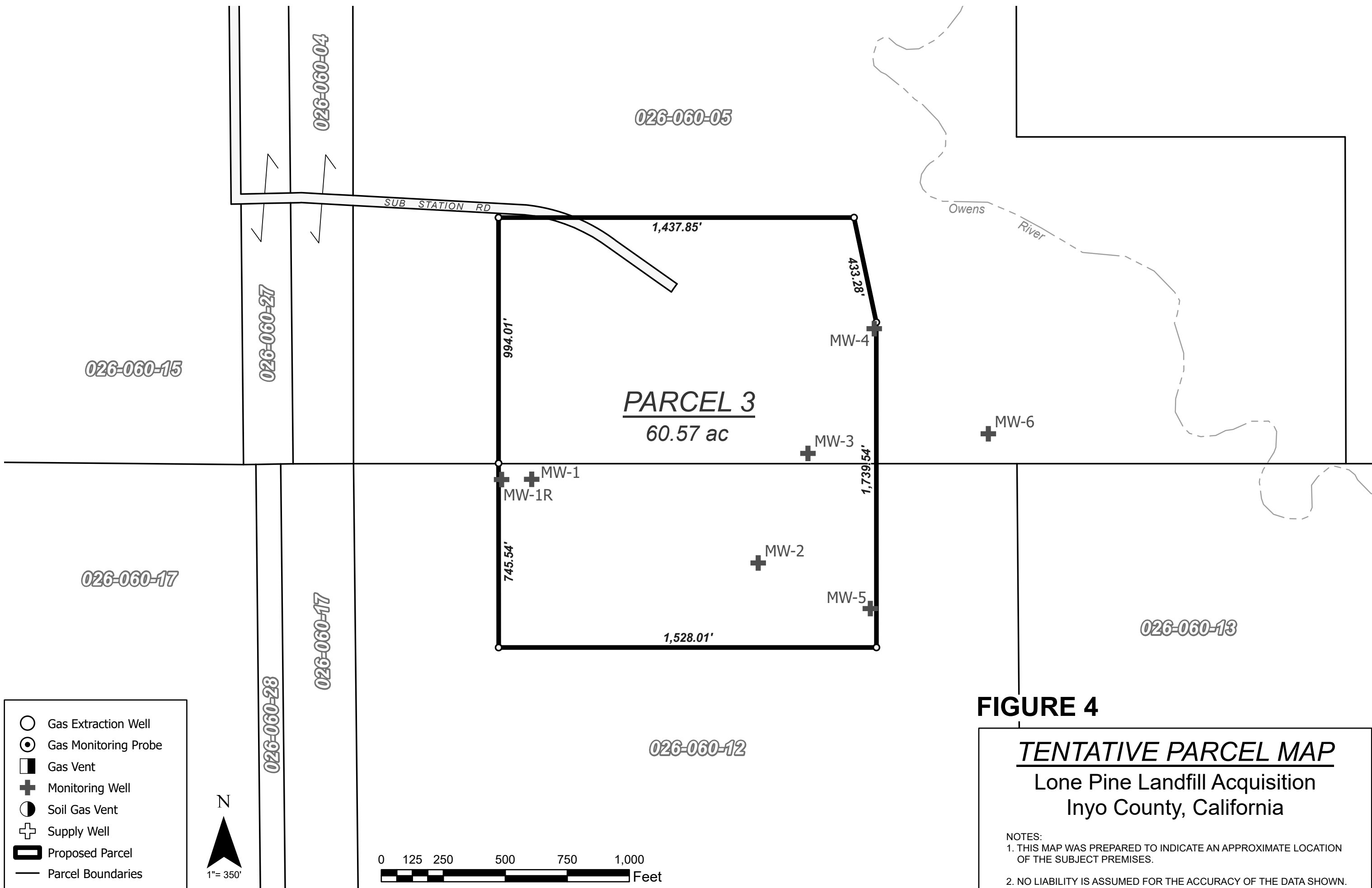


FIGURE 3

TENTATIVE PARCEL MAP
 Independence Landfill Acquisition
 Inyo County, California

NOTES:
 1. THIS MAP WAS PREPARED TO INDICATE AN APPROXIMATE LOCATION OF THE SUBJECT PREMISES.
 2. NO LIABILITY IS ASSUMED FOR THE ACCURACY OF THE DATA SHOWN.



- Gas Extraction Well
- ⊙ Gas Monitoring Probe
- Gas Vent
- ⊕ Monitoring Well
- ◐ Soil Gas Vent
- ⊕ Supply Well
- ▭ Proposed Parcel
- Parcel Boundaries



1" = 350'



FIGURE 4

TENTATIVE PARCEL MAP
 Lone Pine Landfill Acquisition
 Inyo County, California

NOTES:
 1. THIS MAP WAS PREPARED TO INDICATE AN APPROXIMATE LOCATION OF THE SUBJECT PREMISES.
 2. NO LIABILITY IS ASSUMED FOR THE ACCURACY OF THE DATA SHOWN.

INYO COUNTY PROJECT DOCUMENT (S) BISHOP-SUNLAND LANDFILL CAD - GENERAL EXHIBIT SITE PLAN FOR CONSULTANT/PROG.DWG January 27, 2022 - 4:53 PM BY: GLA/USER



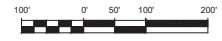
LEGEND

- EXISTING 5' CONTOUR⁽¹⁾
- EXISTING 1' CONTOUR⁽¹⁾
- EXISTING FENCE
- EXISTING PAVED ROAD
- EXISTING UNPAVED ROAD
- APPROXIMATE LIMITS OF WASTE⁽²⁾
- APPROXIMATE LEASE BOUNDARY
- EXISTING BUILDING
- GW-X EXISTING LANDFILL GAS MONITORING PROBES
- GP-X EXISTING LANDFILL GAS MONITORING PROBES (GP-2 THROUGH GP-9 TO BE ABANDONED)
- LFG-X EXISTING LANDFILL GAS EXTRACTION WELL
- GV-X EXISTING LANDFILL GAS VENT
- SGV-X EXISTING SOIL GAS VENT (SGV-1 AND SGV-2 ABANDONED IN FEB. 2008)
- MW-X EXISTING GROUNDWATER MONITORING WELL
- EW-X EXISTING LANDFILL GAS EXTRACTION WELL

FIGURE 5
EXISTING SITE FACILITIES

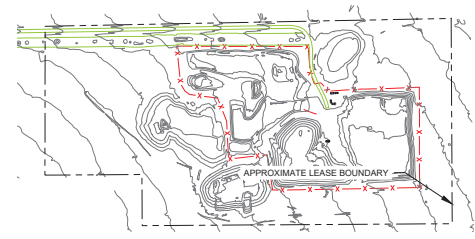
 Bishop-Sunland Landfill
 Inyo County

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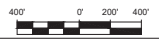


LEGEND

- 1700 ——— EXISTING 5' CONTOUR⁽¹⁾
- 1' CONTOUR⁽¹⁾
- X — X — X — EXISTING FENCE
- — — — — EXISTING PAVED ROAD
- — — — — EXISTING UNPAVED ROAD
- - - - - APPROXIMATE LIMITS OF WASTE⁽²⁾
- — — — — EXISTING DRAINAGE
- - - - - APPROXIMATE LEASE BOUNDARY
- ▭ EXISTING BUILDING
- ⊕ MW-X GROUNDWATER MONITORING WELLS
- ⊕ GW-X EXISTING LANDFILL GAS PROBES



SITE BOUNDARY



- NOTES**
1. EXISTING TOPOGRAPHY BASED ON AERIAL SURVEY TAKEN ON FEBRUARY 4, 2020.
 2. APPROXIMATE WASTE LIMIT AS DETERMINED BY LIMIT OF WASTE INVESTIGATION PREPARED BY MINSHEW ENGINEERING, DECEMBER 2008.

FIGURE 6
EXISTING SITE FACILITIES
 Independence Landfill
 Inyo County

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LEGEND

- 1700 ——— EXISTING 5' CONTOUR⁽¹⁾
- 1700 ——— EXISTING 1' CONTOUR⁽¹⁾
- x — x — x — EXISTING FENCE
- — — — — EXISTING PAVED ROAD
- — — — — EXISTING UNPAVED ROAD
- — — — — APPROXIMATE LIMITS OF WASTE⁽²⁾
- — — — — EXISTING DRAINAGE
- — — — — APPROXIMATE LEASE BOUNDARY
- ▭ EXISTING BUILDING
- ⊕ MW-X EXISTING GROUNDWATER MONITORING WELLS
- ⊕ GW-X EXISTING LANDFILL GAS PROBES

- NOTES
1. REFERENCE AERIAL TOPOGRAPHY BASED ON FEBRUARY 04, 2020 AERIAL SURVEY PERFORMED BY SYNERGY MAPPING. COORDINATES BASED ON CALIFORNIA STATE PLANE COORDINATE SYSTEM NAD83 AND NAVD88.
 2. APPROXIMATE LIMITS OF WASTE AS DETERMINED BY LIMIT OF WASTE INVESTIGATION PREPARED BY MINSHEW ENGINEERING, MAY 2009.

FIGURE 7
EXISTING SITE FACILITIES

Lone Pine Landfill
Inyo County

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APPENDIX A

**NOTICE OF PREPARATION RECORDS AND
SCOPING COMMENTS RECEIVED**



BOARD OF SUPERVISORS
COUNTY OF INYO

P. O. DRAWER N • INDEPENDENCE, CALIFORNIA 93526
TELEPHONE (760) 878-0373
email: dellis@inyocounty.us



FILED

FEB 01 2022

NOTICE OF PREPARATION &
NOTICE OF PUBLIC SCOPING MEETING
DRAFT ENVIRONMENTAL IMPACT REPORT INYO CO. CLERK

The County of Inyo (County), as Lead Agency under the California Environmental Quality Act (CEQA), is publishing this Notice of Preparation (NOP) and Notice of Public Scoping Meeting to prepare an CEQA Initial Study and Draft Environmental Impact Report (EIR) for the proposed AQUISITION OF FEE TITLE FOR THREE PROPERTIES FOR CONTINUED OPERATION OF BISHOP-SUNLAND, INDEPENDENCE AND LONE PINE LANDFILLS (Project). This NOP is published in accordance with Public Resource Code §§21000 - 21189.57 and the CEQA Guidelines §§15000 - 15387, and pursuant to Assembly Bills AB 52 and AB 819.

The purpose of this NOP is to notify local, State, and Federal agencies, Native American tribes, and other interested organizations and individuals that the County plans to prepare a Draft EIR for the proposed Project. The County is circulating this NOP to obtain input regarding the initial scope, content, and environmental issues relevant to the Draft EIR. This NOP provides a summary of the Project locations, Project description, and the expected scope of environmental analysis in the Draft EIR. To ensure that all potential environmental issues are considered and addressed within the Draft EIR, all comments regarding this NOP must be received, in writing, within the extended 45-day **NOP public comment period beginning February 2, 2022 and ending March 18, 2022**. If you wish to be placed on the mailing list to receive notices regarding the proposed Project, have any questions, or need additional information, please use the Contact Person information identified below.

PROJECT APPLICANT: County of Inyo

PROJECT LOCATION: The three properties proposed for transfer to the County for the purpose of continued solid waste disposal are the existing public landfill facilities near the City of Bishop and the communities of Independence and Lone Pine. The County operates three landfills pursuant to leases from the Los Angeles Department of Water and Power (LADWP) – the Bishop-Sunland Landfill, Independence Landfill, and Lone Pine Landfill. The Bishop-Sunland Landfill, established in 1955, is located on a 120-acre site 2 miles southwest of Bishop, and has an unlined disposal footprint covering 78 acres. The Independence Landfill, established in 1965, is located on a 90-acre site south of Independence. The Lone Pine Landfill, established in 1965, is located on approximately 60 acres southeast of the unincorporated community of Lone Pine. All three landfills are operated by the County subject to oversight and permits by the County Department of Environmental Health Services, the California Department of Resources Recycling and Recovery (CalRecycle), the Lahontan Regional Water Quality Control Board (RWQCB), and the Great Basin Unified Air Pollution Control District.

MEMBERS OF THE BOARD • DAN TOTHEROH • JEFF GRIFFITHS • RICK PUCCI • JENNIFER ROESER • MATT KINGSLEY
LESLIE L CHAPMAN • Clerk of the Board • DARCY ELLIS • Assistant Clerk of the Board

22-00004

Facility address and permit identification numbers are listed below:

BISHOP-SUNLAND CLASS III LANDFILL
110 Sunland Reservation Road
Bishop, CA 93514
SWFP Facility Number 14-AA-0005
Waste Discharge Requirements:
CRWQCB Order No. 6-01-34, WDID No. 6B140300002

INDEPENDENCE CLASS III LANDFILL
End of Dump Road
Independence, CA 93526
SWFP Facility Number 14-AA-0004
Waste Discharge Requirements:
Board Order No. 6-95-116, WDID No. 6B140300004

LONE PINE CLASS III LANDFILL
End of Substation Road
Lone Pine, CA 93545
SWFP Facility Number 14-AA-0003
Waste Discharge Requirements:
Board Order No. 6-95-70, WDID No. 6B140300006

See attached Regional Map and Site Plans for each of the three subject properties (Figures 1-4).

Project Description

The County has been operating three (3) existing landfills near the communities of Bishop, Independence, and Lone Pine for over 50 years, to provide essential waste disposal services to its citizens. For the County to continue to use and operate the landfill properties for solid waste disposal purposes in accordance with permit requirements, and in compliance with current laws and regulations regarding landfills in California, the County must acquire the properties on which the waste disposal facilities are located. The County does not intend to change the general use of the properties at issue from their existing uses. However, those operations may be changed as required to comply with current regulatory requirements set forth by Public Resources Code, Division 30; California Code of Regulations (CCR) Title 14; CCR Title 27; Solid Waste Facility Permits issued by the California Department of Resources Recycling and Recovery (CalRecycle); Waste Discharge Requirements issued by the Lahontan Regional Water Quality Control Board (RWQCB); and other applicable local, State, and Federal regulations, as well as other reasonably foreseeable changes flowing from the change in ownership of the properties.

The County has been operating the three subject landfills on properties owned by LADWP, and the continued and uninterrupted operation of the landfills has been contingent on securing renewals and/or extensions of the leases (which, among other things, LADWP has insisted be limited to 3-year terms, thus requiring frequent renegotiation and renewals). The Solid Waste Facility Permits for the sites must be reviewed every 5 years and revised as necessary to reflect current waste loads and site life calculations, approved Preliminary Closure and Post-Closure Maintenance Plans (PCPCMPs), and changes to the WDRs including implementation of any required corrective action. Since 2014, it has become

impossible to negotiate timely renewals of the leases with LADWP, due to additional lease conditions and other obstacles and restrictions imposed by LADWP.

The continued operation of unlined Class III Landfills, by nature of the land use and types of wastes accepted, have the potential to cause significant environmental impacts. However, landfill operation in California is highly regulated, and use is predictable due to a required long-term planning horizon. Even after a landfill site is formally closed according to its PCPCMP, a 30-year post-closure monitoring and maintenance period is required. The Solid Waste Facility Permits, PCPCMPs, and WDRs all provide substantial protections, in the form of permit conditions, to avoid potential environmental impacts. In addition, with the proposed transfer of property ownership, the County will be able to streamline and complete many compliance efforts in progress which have been impeded and delayed by lease and permitting conditions imposed by LADWP.

With the proposed acquisition of fee title by the County for the subject properties, continued operation of each of these essential public facilities will be continued by the County, in compliance with current regulations under the authority of three primary permitting agencies:

1. Inyo County Environmental Health Department, serving as the Local Enforcement Agency (LEA)
2. California Department of Resources, Recycling and Recovery
3. Lahontan Regional Water Quality Control Board

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

- Update of the recently approved PCPCMPs for each landfill, for approval by the LEA and CalRecycle
- Update of the Joint Technical Document/Report of Disposal Site Information for each landfill
- Preparation of a Solid Waste Facilities Permit Revision Application for each of the three landfills, for submittal to the LEA, CalRecycle, and the Lahontan RWQCB.
- Revision of WDRs with the Lahontan RWQCB to reflect property transfer and current Evaluation Monitoring Program (Lone Pine Landfill) and Corrective Action Program (Bishop-Sunland Landfill)
- Review and potential modification of parcel boundaries, to include the landfill gas and groundwater monitoring well networks for each facility required by CCR Title 27, current WDRs which extend outside of the current lease areas
- Continuation of landfill gas monitoring and reporting according to Title 27 requirements, groundwater monitoring and reporting according to current Monitoring and Reporting Plans, and continued implementation of Evaluation Monitoring and Corrective Action Monitoring programs.
- Continued monitoring and operation of the septage ponds, contaminated soil landfarm, asbestos disposal area, waste oil disposal and recycling facilities, and waste diversion programs according to permit and WDR requirements
- Evaluation of water supply for dust-control and other operational uses, with potential permitting and installation of on-site supply wells as necessary to continue operation and regulatory compliance (which would replace the County's current practice of trucking in off-site water for such purposes at two of the three landfills).

- Evaluation of reasonably foreseeable operational changes resulting from the County's ownership acquisition of the properties.

Most of the above referenced technical documents are recently updated, and only minor changes to reflect ownership change, or additions to comply with regulatory requirements, are anticipated. The current permitting documents for each site describe the operations and permit requirements in detail, and will be presented and described in detail during the public scoping meeting.

Environmental Effects to be Analyzed

The Draft EIR will evaluate the potential environmental effects associated with the proposed Project, and review the effectiveness of existing mitigation measures. The following environmental issue areas will be analyzed in the EIR: air quality; biological resources; cultural and tribal cultural resources; energy; geology and soils; greenhouse gas emissions; aesthetics, hazards and hazardous materials, hydrology and water quality; land use and planning; and public services (including solid waste disposal). The Draft EIR will also evaluate potential growth inducing effects, cumulative effects, irreversible environmental impacts, energy impacts, and may include other topics identified during scoping.

REVIEW PERIOD: The CEQA Guidelines requires circulation of a NOP for a minimum 30-day review period. In consideration of the ongoing Coronavirus (COVID-19) pandemic, Inyo County will be circulating the NOP for the proposed Project for an extended 45 days. The County welcomes agency and public input during this period regarding the scope and content of environmental information that must be included in the Draft EIR.

PUBLIC SCOPING MEETING: In an effort to reduce the risk of COVID-19, the County will hold a scoping meeting via teleconference on **February 24, 2022 at 10:00 am** to describe the proposed Project, the environmental review process, and to receive public comments on the scope of the EIR. County staff and the County's EIR consultants will participate via teleconference.

You are invited to a Zoom webinar.

When: **Feb 24, 2022 10:00 AM Pacific Time (US and Canada)**

Topic: **Inyo County Landfill EIR – Public Scoping Meeting**

Please click the link below to join the webinar:

<https://us06web.zoom.us/j/89514896180>

Or One tap mobile :

US: +16699006833,,89514896180# or +12532158782,,89514896180#

Or Telephone:

Dial(for higher quality, dial a number based on your current location):

US: +1 669 900 6833 or +1 253 215 8782 or +1 346 248 7799 or +1 312 626 6799 or +1 929 205 6099 or
+1 301 715 8592

Webinar ID: 895 1489 6180

International numbers available: <https://us06web.zoom.us/j/89514896180>

Scoping comments may be submitted, in writing, by 5:00 p.m. on March 18, 2022 and addressed to:

John Pinckney, Deputy Director
Inyo County Public Works
168 N. Edwards St.
PO Drawer Q

MEMBERS OF THE BOARD • DAN TOTEROH • JEFF GRIFFITHS • RICK PUCCI • JENNIFER ROESER • MATT KINGSLEY
LESLIE L CHAPMAN • Clerk of the Board • DARCY ELLIS • Assistant Clerk of the Board

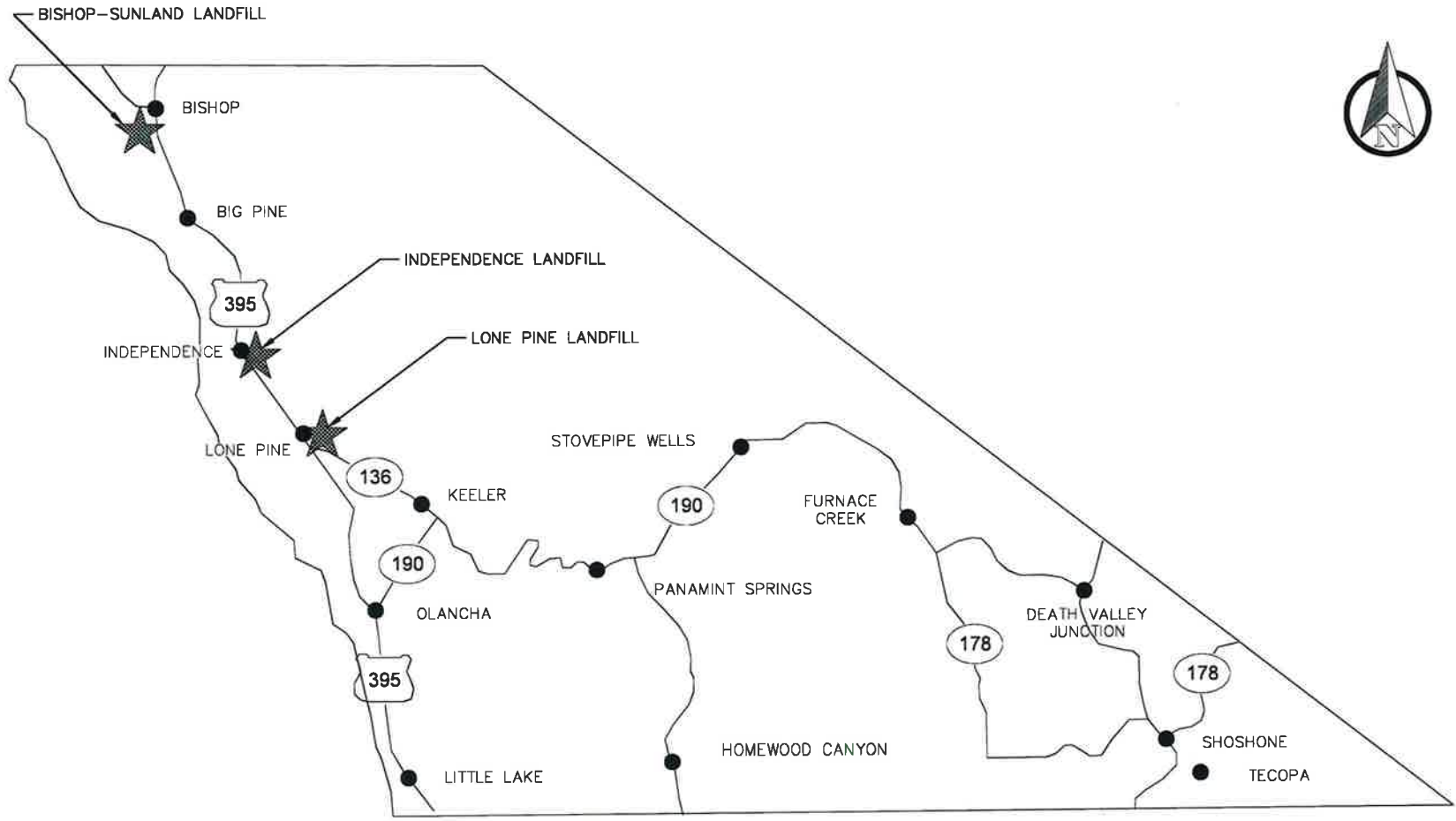
22-00004

Independence, CA, 93526
E-mail: jpinckney@inyocounty.us

Due to the time limits mandated by State law, comments regarding this NOP must be received not later than 5:00 p.m. on March 18, 2022. All comments provided will become public record.

Once scoping comments have been received from Responsible Agencies, interested parties, and the public, a detailed Project Description and Initial Study will be prepared by the County, which will further detail the scope and focus of the EIR and provide preliminary analysis of key issues identified during the scoping period. This Initial Study will be made available to Responsible Agencies, the public, and interested parties, and will allow the County to share information and allow for additional input on the project details and scope of the environmental review.

Date Issued: February 1, 2022



INYO COUNTY

NOT TO SCALE

| | | | |
|---|---------------|-----------------|------------------------------|
| NOTICE OF PREPARATION & NOTICE OF PUBLIC SCOPING | | | FIGURE NO. 1 |
| INYO COUNTY, CA | | | PROJECT NO. AA/21.1202.00 |
| REGIONAL MAP | | | |
| DATE OF ISSUE: 01/27/2022 | DRAWN BY: RCD | APPROVED BY: NC | |
| Geo-Logic ASSOCIATES | | | |
| 143E Spring Hill Dr, Grass Valley, California 95945 geo-logic.com 530.272.2448 | | | |

INYO COUNTY PROJECT DOCUMENTS: BISHOP-SUNLAND LANDFILL; INDEPENDENCE LANDFILL; LONE PINE LANDFILL; DRAWN: January 27, 2022 - 4:45 PM BY: GJA/LSB

22-00004

This figure has not been published but rather has been prepared by Geo-Logic Associates, Inc. for use by the client named in the title block, solely in respect of the construction, operation, and maintenance of the facility named in the title block. Geo-Logic Associates, Inc. shall not be liable for the use of this figure on any other facility or for any other purpose.

22-00004

INYO COUNTY PROJECT DOCUMENTS-BISHOP-SUNLAND LANDFILL-CONSTRUCTION/REMIEDIATION PLAN FOR CEREBELL NAVITOPUS DWG. January 28, 2022 - 8:38 AM BY: G.A. USER



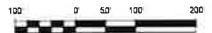
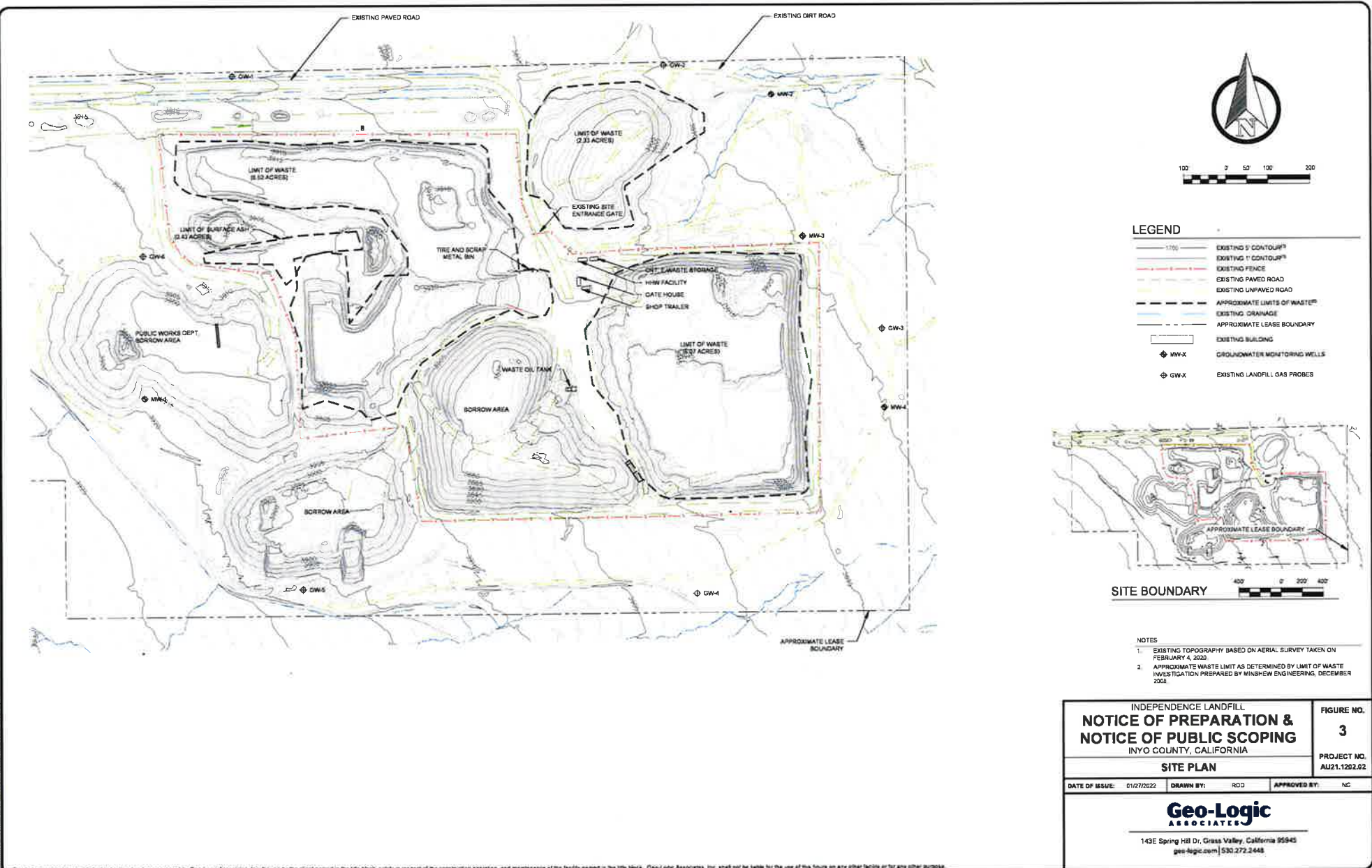
- LEGEND**
- 1700 ——— EXISTING 5' CONTOUR¹
 - 1700 ——— EXISTING 1' CONTOUR²
 - - - - - EXISTING FENCE
 - — — — — EXISTING PAVED ROAD
 - — — — — EXISTING UNPAVED ROAD
 - - - - - APPROXIMATE LIMITS OF WASTE³
 - - - - - APPROXIMATE LEASE BOUNDARY
 - ▭ EXISTING BUILDING
 - ⊕ GW-X EXISTING LANDFILL GAS MONITORING PROBES
 - ⊕ LFD-X EXISTING LANDFILL GAS EXTRACTION WELL
 - ⊕ CV-X EXISTING LANDFILL GAS VENT
 - ⊕ SCV-X EXISTING SOIL GAS VENT (SCV-1 AND SCV-2 ABANDONED IN FEB. 2008)
 - ⊕ MW-X EXISTING GROUNDWATER MONITORING WELL
 - ⊕ EW-X EXISTING LANDFILL GAS EXTRACTION WELL
 - SW-X EXISTING SUPPLY WELL

| | | |
|---|------------|--------------|
| BISHOP-SUNLAND LANDFILL | | FIGURE NO. |
| NOTICE OF PREPARATION & NOTICE OF PUBLIC SCOPING | | 2 |
| INYO COUNTY, CALIFORNIA | | PROJECT NO. |
| SITE PLAN | | AU21-1202.01 |
| DATE OF ISSUE: | 01/27/2022 | DRAWN BY: |
| | | RDD |
| | | APPROVED BY: |
| | | NC |
| Geo-Logic ASSOCIATES | | |
| 143E Spring Hill Dr, Grass Valley, California 95945 geo-logic.com 530.272.2448 | | |

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INDEPENDENCE LANDFILL GENERAL IMPROVEMENT PLAN FOR PUBLIC AND CONSULTANT REVIEW FOR PUBLICATION, JANUARY 27, 2022, 4.54 PM BY: DLA/USA

22-00004



LEGEND

- 1700 — EXISTING 5' CONTOUR¹
- 1800 — EXISTING 1' CONTOUR¹
- - - - - EXISTING FENCE
- — — — — EXISTING PAVED ROAD
- — — — — EXISTING UNPAVED ROAD
- - - - - APPROXIMATE LIMITS OF WASTE²
- — — — — EXISTING DRAINAGE
- - - - - APPROXIMATE LEASE BOUNDARY
- ▭ EXISTING BUILDING
- ⊕ MW-X GROUNDWATER MONITORING WELLS
- ⊕ GW-X EXISTING LANDFILL GAS PROBES



SITE BOUNDARY

- NOTES**
- EXISTING TOPOGRAPHY BASED ON AERIAL SURVEY TAKEN ON FEBRUARY 4, 2020.
 - APPROXIMATE WASTE LIMIT AS DETERMINED BY LIMIT OF WASTE INVESTIGATION PREPARED BY MINDEW ENGINEERING, DECEMBER 2008.

| | | |
|--|---------------|--|
| INDEPENDENCE LANDFILL NOTICE OF PREPARATION & NOTICE OF PUBLIC SCOPING INYO COUNTY, CALIFORNIA | | FIGURE NO. 3 |
| SITE PLAN | | PROJECT NO. AU21.1202.02 |
| DATE OF ISSUE: 01/27/2022 | DRAWN BY: RDD | APPROVED BY: NC |
| | | |
| 143E Spring Hill Dr, Grass Valley, California 95945 geo-logic.com 530.272.2448 | | |

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22-00004

INYO COUNTY PROJECT DOCUMENTS FOR THE LANDFILL GENERAL USE PERMIT PLANNING PERIOD 27, 2022, 4:51 PM BY: CJA/LSBR



LEGEND

- 1750 — EXISTING 5' CONTOUR
- — — EXISTING 1' CONTOUR
- - - - - EXISTING FENCE
- - - - - EXISTING PAVED ROAD
- - - - - EXISTING UNPAVED ROAD
- - - - - APPROXIMATE LIMITS OF WASTE
- - - - - EXISTING GRADAGE
- - - - - APPROXIMATE LEASE BOUNDARY
- ▭ EXISTING BUILDING
- ⊕ MW-X EXISTING GROUNDWATER MONITORING WELLS
- ⊕ CW-X EXISTING LANDFILL GAS PROBES

NOTES

1. REFERENCE AERIAL TOPOGRAPHY BASED ON FEBRUARY 04, 2020 AERIAL SURVEY PERFORMED BY SYLVESTER MAPPING COORDINATES BASED ON CALIFORNIA STATE PLANE COORDINATE SYSTEM NAD83 AND NAVD83
2. APPROXIMATE LIMITS OF WASTE AS DETERMINED BY LIMIT OF WASTE INVESTIGATION PREPARED BY MINSHAW ENGINEERING, MAY 2009

| | | |
|---|-----------|-----------------|
| LONE PINE LANDFILL | | FIGURE NO. |
| NOTICE OF PREPARATION & NOTICE OF PUBLIC SCOPING | | 4 |
| INYO COUNTY, CA | | PROJECT NO. |
| SITE PLAN | | AU21.1202.00 |
| DATE OF ISSUE: | 01/2/2022 | DRAWN BY: RDC |
| | | APPROVED BY: NC |
| Geo-Logic ASSOCIATES | | |
| 143E Spring Hill Dr, Grass Valley, California 95945 geo-logic.com 530.272.2448 | | |

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Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

| |
|--------------|
| SCH # |
|--------------|

Project Title: _____
 Lead Agency: _____ Contact Person: _____
 Mailing Address: _____ Phone: _____
 City: _____ Zip: _____ County: _____

Project Location: County: _____ City/Nearest Community: _____
 Cross Streets: _____ Zip Code: _____
 Longitude/Latitude (degrees, minutes and seconds): _____° _____' _____" N / _____° _____' _____" W Total Acres: _____
 Assessor's Parcel No.: _____ Section: _____ Twp.: _____ Range: _____ Base: _____
 Within 2 Miles: State Hwy #: _____ Waterways: _____
 Airports: _____ Railways: _____ Schools: _____

Document Type:

| | | | |
|--------------------------------------|--|------------------------------------|--|
| CEQA: <input type="checkbox"/> NOP | <input type="checkbox"/> Draft EIR | NEPA: <input type="checkbox"/> NOI | Other: <input type="checkbox"/> Joint Document |
| <input type="checkbox"/> Early Cons | <input type="checkbox"/> Supplement/Subsequent EIR | <input type="checkbox"/> EA | <input type="checkbox"/> Final Document |
| <input type="checkbox"/> Neg Dec | (Prior SCH No.) _____ | <input type="checkbox"/> Draft EIS | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Mit Neg Dec | Other: _____ | <input type="checkbox"/> FONSI | _____ |

Local Action Type:

| | | | |
|---|---|--|---|
| <input type="checkbox"/> General Plan Update | <input type="checkbox"/> Specific Plan | <input type="checkbox"/> Rezone | <input type="checkbox"/> Annexation |
| <input type="checkbox"/> General Plan Amendment | <input type="checkbox"/> Master Plan | <input type="checkbox"/> Prezone | <input type="checkbox"/> Redevelopment |
| <input type="checkbox"/> General Plan Element | <input type="checkbox"/> Planned Unit Development | <input type="checkbox"/> Use Permit | <input type="checkbox"/> Coastal Permit |
| <input type="checkbox"/> Community Plan | <input type="checkbox"/> Site Plan | <input type="checkbox"/> Land Division (Subdivision, etc.) | <input type="checkbox"/> Other: _____ |

Development Type:

| | |
|---|--|
| <input type="checkbox"/> Residential: Units _____ Acres _____ | <input type="checkbox"/> Transportation: Type _____ |
| <input type="checkbox"/> Office: Sq.ft. _____ Acres _____ Employees _____ | <input type="checkbox"/> Mining: Mineral _____ |
| <input type="checkbox"/> Commercial: Sq.ft. _____ Acres _____ Employees _____ | <input type="checkbox"/> Power: Type _____ MW _____ |
| <input type="checkbox"/> Industrial: Sq.ft. _____ Acres _____ Employees _____ | <input type="checkbox"/> Waste Treatment: Type _____ MGD _____ |
| <input type="checkbox"/> Educational: _____ | <input type="checkbox"/> Hazardous Waste: Type _____ |
| <input type="checkbox"/> Recreational: _____ | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Water Facilities: Type _____ MGD _____ | |

Project Issues Discussed in Document:

| | | | |
|---|---|--|---|
| <input type="checkbox"/> Aesthetic/Visual | <input type="checkbox"/> Fiscal | <input type="checkbox"/> Recreation/Parks | <input type="checkbox"/> Vegetation |
| <input type="checkbox"/> Agricultural Land | <input type="checkbox"/> Flood Plain/Flooding | <input type="checkbox"/> Schools/Universities | <input type="checkbox"/> Water Quality |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Forest Land/Fire Hazard | <input type="checkbox"/> Septic Systems | <input type="checkbox"/> Water Supply/Groundwater |
| <input type="checkbox"/> Archeological/Historical | <input type="checkbox"/> Geologic/Seismic | <input type="checkbox"/> Sewer Capacity | <input type="checkbox"/> Wetland/Riparian |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Minerals | <input type="checkbox"/> Soil Erosion/Compaction/Grading | <input type="checkbox"/> Growth Inducement |
| <input type="checkbox"/> Coastal Zone | <input type="checkbox"/> Noise | <input type="checkbox"/> Solid Waste | <input type="checkbox"/> Land Use |
| <input type="checkbox"/> Drainage/Absorption | <input type="checkbox"/> Population/Housing Balance | <input type="checkbox"/> Toxic/Hazardous | <input type="checkbox"/> Cumulative Effects |
| <input type="checkbox"/> Economic/Jobs | <input type="checkbox"/> Public Services/Facilities | <input type="checkbox"/> Traffic/Circulation | <input type="checkbox"/> Other: _____ |

Present Land Use/Zoning/General Plan Designation:

Project Description: (please use a separate page if necessary)

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".
If you have already sent your document to the agency please denote that with an "S".

| | |
|---|---|
| _____ Air Resources Board | _____ Office of Historic Preservation |
| _____ Boating & Waterways, Department of | _____ Office of Public School Construction |
| _____ California Emergency Management Agency | _____ Parks & Recreation, Department of |
| _____ California Highway Patrol | _____ Pesticide Regulation, Department of |
| _____ Caltrans District # _____ | _____ Public Utilities Commission |
| _____ Caltrans Division of Aeronautics | _____ Regional WQCB # _____ |
| _____ Caltrans Planning | _____ Resources Agency |
| _____ Central Valley Flood Protection Board | _____ Resources Recycling and Recovery, Department of |
| _____ Coachella Valley Mtns. Conservancy | _____ S.F. Bay Conservation & Development Comm. |
| _____ Coastal Commission | _____ San Gabriel & Lower L.A. Rivers & Mtns. Conservancy |
| _____ Colorado River Board | _____ San Joaquin River Conservancy |
| _____ Conservation, Department of | _____ Santa Monica Mtns. Conservancy |
| _____ Corrections, Department of | _____ State Lands Commission |
| _____ Delta Protection Commission | _____ SWRCB: Clean Water Grants |
| _____ Education, Department of | _____ SWRCB: Water Quality |
| _____ Energy Commission | _____ SWRCB: Water Rights |
| _____ Fish & Game Region # _____ | _____ Tahoe Regional Planning Agency |
| _____ Food & Agriculture, Department of | _____ Toxic Substances Control, Department of |
| _____ Forestry and Fire Protection, Department of | _____ Water Resources, Department of |
| _____ General Services, Department of | |
| _____ Health Services, Department of | _____ Other: _____ |
| _____ Housing & Community Development | _____ Other: _____ |
| _____ Native American Heritage Commission | |

Local Public Review Period (to be filled in by lead agency)

Starting Date _____ Ending Date _____

Lead Agency (Complete if applicable):

| | |
|------------------------|-----------------------|
| Consulting Firm: _____ | Applicant: _____ |
| Address: _____ | Address: _____ |
| City/State/Zip: _____ | City/State/Zip: _____ |
| Contact: _____ | Phone: _____ |
| Phone: _____ | |

Signature of Lead Agency Representative: _____ Date: _____

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

INVITATIONS FOR TRIBAL CONSULTATION - DIRECT MAIL 02.01.2022

| Name | Tribe | Address | city, state, zip |
|--|---|------------------------------|------------------------|
| L'eau Stewart, Chairperson | Big Pine Paiute Tribe of the Owens Valley | PO Box 700 | Big Pine, CA 93513 |
| Danelle Guterrez, THPO | Big Pine Paiute Tribe of the Owens Valley | PO Box 700 | Big Pine, CA 93513 |
| Cheryl Levine, Tribal Administrator | Big Pine Paiute Tribe of the Owens Valley | PO Box 700 | Big Pine, CA 93513 |
| Sally Manning, Environmental Coordinator | Big Pine Paiute Tribe of the Owens Valley | PO Box 700 | Big Pine, CA 93513 |
| Allen Summers Sr., Chairperson | Bishop Paiute Tribe | 50 Tu Su Lane | Bishop, CA 93514 |
| Tillford Denver | Bishop Paiute Tribe | 50 Tu Su Lane | Bishop, CA 93514 |
| Gloriana M. Bailey, Tribal Administrator | Bishop Paiute Tribe | 50 Tu Su Lane | Bishop, CA 93514 |
| Monty Bengochia, THPO | Bishop Paiute Tribe | 50 Tu Su Lane | Bishop, CA 93514 |
| Carl Dahlberg, Chairperson | Fort Independence Indian Community of Paiutes | PO Box 67 | Independence, CA 93526 |
| Richard Button, Chairperson | Lone Pine Paiute-Shoshone Tribe | PO Box 747 | Lone Pine, CA 93545 |
| Jimmy-John Thompson, Chairperson | Timbisha Shoshone Tribe | 621 W. Line Street Suite 109 | Bishop, CA 93514 |
| George Gholson, Vice Chairperson | Timbisha Shoshone Tribe | 621 W. Line Street Suite 109 | Bishop, CA 93514 |
| Darrell Mike, Tribal Chairperson | Twenty-Nine Palms Band of Mission Indians | 46-200 Harrison Place | Coachella, CA 92236 |
| Anthony Madrigal, Jr., Tribal Grants Administrator | Twenty-Nine Palms Band of Mission Indians | 46-200 Harrison Place | Coachella, CA 92236 |
| Doug Todd Welmas | Cabazon Band of the Mission Indians | 84-245 Indio Springs Parkway | Indio, CA 92203 |
| Jacquelyn Barnum, Environmental Director | Cabazon Band of the Mission Indians | 84-245 Indio Springs Parkway | Indio, CA 92203 |
| Michael Mirelez, Cultural Resource Coordinator | Torez Martinez Desert Cahuila Indians | PO Box 1160 | Thermal, CA 92274 |

From: John Pinckney <jpinckney@inyocounty.us>
Sent: Thursday, February 3, 2022 4:19 PM
To: Fred Aubrey; Naomi Jensen; John-Carl Vallejo
Cc: Meisinger, Nick
Subject: RE: SCH Number 2022020028
Attachments: Copy of Copy of Tribal Consultation Mailing List - UPDATED 02.01.2022.xlsx

I sent certified USPS to the most recent AB52 list, see attached.

Also mailed to:

| | | | |
|---|----------------------------|--------------------------------------|------------------------|
| | | | |
| Lahontan Regional Water Quality Control Board | Jan Zimmerman | 15095 Amaragosa Rd., Bldg 2, Ste 210 | Victorville, CA 92394 |
| CalRecycle | Kelsey Orr | 1001 I Street | Sacramento, CA 95814 |
| GBUAPCD | Phillip Kiddoo | 157 Short Street | Bishop, CA 93514 |
| LADWP | Elsa Jimenez | 300 Mandich St | Bishop, CA 93514 |
| LADWP | Charles Holloway | 111 N. Hope Street, Room 1044 | Los Angeles, CA 90012 |
| CDFW | | 787 N. Main St., Ste 220 | Bishop, CA 93514 |
| United States Dept. of the Interior, NPS | Death Valley National Park | P.O. Box 579 | Death Valley, CA 92328 |
| City of Bishop | Deston Dishion | P.O Box 1236 | Bishop, CA 93515 |
| Caltrans District 9 | Ryan Dermody | 500 Main St | Bishop, CA 93514 |

Regards,
John Pinckney
Deputy Director
Inyo County Public Works
168 N. Edwards St.
P.O. Drawer Q
Independence, CA 93526
760-878-0207 Direct
541-948-0669 Cell

Scoping Meeting Summary
Acquisition of Fee Title for Three Properties for Continued Operation of
Bishop-Sunland, Independence, and Lone Pine Landfills
Inyo County
February 24, 2022

Summary of Verbal Comments

Sally Manning, Environmental Director
Big Pine Paiute Tribe
(760) 938-2003 Ext. 233
S. Manning@BigPinePaiute.org

- Where is the County of Inyo at with the Supreme Court in the appeal process? Why is the County going through with the California Environmental Quality Act (CEQA) process for eminent domain? Is it possible that the need for the Environmental Impact Report (EIR) will go away?
 - John Vallejo (County of Inyo) described that the litigation is ongoing in the background is not yet completely concluded and we are not going to speculate during the preparation of the EIR.
- What is the purpose of the monitoring wells? Are those monitoring wells for water, gas, or both?
 - Naomi Jensen (TEAM Environmental) described that all of the landfills have a gas monitoring network as well as groundwater monitoring network associated with the Waste Discharge Requirements (WDRs).
 - The off-site monitoring wells are all related to groundwater monitoring.
- It would be helpful to see the monitoring reports to understand what sort of contamination may be present within the vicinity of the landfills.
 - Naomi described that all of the groundwater monitoring reports are publicly available via GeoTracker.
 - There are some volatile organic compounds (VOCs) in the underlying groundwater table at trace detect levels; these are being monitored.
 - Any remedial actions, if determined necessary, would be implemented at the discretion of Lahontan Regional Water Quality Control Board (RWQCB).
- Is Los Angeles Department of Water and Power (LADWP) involved as an agency with discretionary responsibilities?
 - John described that LADWP could, in theory, take actions to sell the land, so they have discretionary responsibilities in that sense
- Agencies should respect the scoping process and raise questions/concerns during the scoping process if they have them.

Tiffany Steinert, Engineering Geologist
 Lahontan Regional Water Quality Control Board
 (760) 241-7305

- Tiffany confirmed that the Lahontan RWQCB may submit comments in writing.
- However, with no changes to the landfills Tiffany does not see any issues at this time.

Scoping Meeting Attendees

| Name and Organization | Phone Numbers |
|--|-------------------------|
| - | (415) 517-2751 |
| - | (562) 296-8987 |
| Christian Marsh – Downey Brand LLP | - |
| Christian Milovich – Inyo County | - |
| Grace Chuchla – Inyo County | - |
| Greg Foote, TEAM Environmental | - |
| Greg James – Inyo Attorney Support | - |
| Kathryn Oehlschlager - Downey Brand LLP | - |
| Kelsey Orr, CalRecycle Waste Permitting, Compliance and Mitigation Division | - |
| Melanie Tory – LADWP Attorney | - |
| Michael Errante – Inyo County | - |
| Sally Manning, Environmental Director Big Pine Paiute Tribe | (760) 938-2003 Ext. 233 |
| Tiffany Steinert, Engineering Geologist Lahontan Region Water Quality Control Board | (760) 241-7305 |

NATIVE AMERICAN HERITAGE COMMISSION

Governor's Office of Planning & Research

Feb 11 2022

STATE CLEARINGHOUSE

February 8, 2022

John Pinckney, Deputy Director ICPW
County of Inyo
168 N. Edwards St., P.O. Drawer Q
Independence, CA 93526

Re: 2022020028, Acquisition of Fee Title for Continued Operation of Bishop-Sunland, Independence and Lone Pine Landfills Project, Inyo County

Dear Mr. Pinckney:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

PARLIAMENTARIAN
Russell Attebery
Karuk

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

 - a.** A brief description of the project.
 - b.** The lead agency contact information.
 - c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

 - a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

 - a.** Alternatives to the project.
 - b.** Recommended mitigation measures.
 - c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

 - a.** Type of environmental review necessary.
 - b.** Significance of the tribal cultural resources.
 - c.** Significance of the project's impacts on tribal cultural resources.
 - d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

 - a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- b.** The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
- 3.** Contact the NAHC for:
- a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
- 4.** Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
- a.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse



March 18, 2022

John Pinckney, Deputy Director
Inyo County Public Works
168 N. Edwards St.
PO Drawer Q
Independence, CA, 93526
jpinckney@inyocounty.us

Subject: SCH No. 2022020028 – Notice of Preparation of a Draft EIR - Acquisition of Fee Title for Continued Operation of Bishop-Sunland, Independence and Lone Pine Landfills – Inyo County – Facility Numbers: 14-AA-0005, 14-AA-0004, and 14-AA-0003

Dear Mr. Pinckney,

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

Project Description

The County of Inyo, acting as Lead Agency, has prepared and circulated a Notice of Preparation (NOP) and Notice of Public Scoping Meeting to prepare a CEQA Initial Study and Draft Environmental Impact Report (EIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed projects.

Bishop Sunland Landfill is located at 110 Sunland Reservation Road, Bishop, CA 93514. The site is approximately 120 acres and it, and the surrounding land, is zoned as Open Space - Minimum 40 Acres. Operations occur daily from 7:30 AM to 3:30 PM with the exception of certain holidays. Bishop-Sunland landfill is currently permitted to

allow 235 vehicles per day and 160 tons per day total (135 tons per day for disposal and 25 tons per day for reuse/recycling).

Independence Landfill is located at the end of Dump Road in Independence, California. The site is approximately 90 acres and it, and the surround land, is zoned as Open Space - Minimum 40 Acres. Operations occur Sunday, from 7 AM to 3 PM, and Thursday, from 7:30 AM to 3 PM, with the exception of certain holidays. Independence Landfill is currently permitted to allow 50 vehicles per day and 10 tons per day.

Lone Pine Landfill is located at the end of Substation Road in Lone Pine, California. The site is approximately 60 acres and it, and the surrounding area, is zoned as Open Space - Minimum 40 Acres. Operations occur Friday, Saturday, and Monday from 7 AM to 3 PM, with the exception of certain holidays. Lone Pine Landfill is currently permitted to allow 75 vehicles per day and 22 tons per day.

The proposed project would include the following changes for each of the above facilities:

- The landowner would change from the Los Angeles Department of Water and Power (LADWP) to the County of Inyo
- Update of the recently approved PCPMPs for each landfill, for approval by the LEA and CalRecycle
- Update of the Joint Technical Document/Report of Disposal Site Information for each landfill
- Preparation of a Solid Waste Facilities Permit Revision Application for each of the three landfills, for submittal to the LEA, CalRecycle, and the Lahontan RWQCB.
- Revision of WDRs with the Lahontan RWQCB to reflect property transfer and current Evaluation Monitoring Program (Lone Pine Landfill) and Corrective Action Program (Bishop-Sunland Landfill)
- Review and potential modification of parcel boundaries, to include the landfill gas and groundwater monitoring well networks for each facility required by CCR Title 27, current WDRs which extend outside of the current lease areas
- Continuation of landfill gas monitoring and reporting according to Title 27 requirements, groundwater monitoring and reporting according to current Monitoring and Reporting Plans, and continued implementation of Evaluation Monitoring and Corrective Action Monitoring programs.
- Continued monitoring and operation of the septage ponds, contaminated soil landfarm, asbestos disposal area, waste oil disposal and recycling facilities, and waste diversion programs according to permit and WDR requirements
- Evaluation of water supply for dust-control and other operational uses, with potential permitting and installation of on-site supply wells as necessary to continue operation and regulatory compliance (which would replace the County's

current practice of trucking in off-site water for such purposes at two of the three landfills).

- Evaluation of reasonably foreseeable operational changes resulting from the
- County's ownership acquisition of the properties.

Comments

When preparing the EIR, please make an effort to use terminology that is consistent with definitions in the applicable sections of the California Code of Regulations, Titles 14 and 27, respectively.

The Solid Waste Facilities Permits for each landfill will need to be updated to reflect the changes in ownership. Prior to implementation of these changes, the operator shall submit the required documentation pursuant to 27 CCR Section 21630, for processing by the Local Enforcement Agency (LEA).

Should modification of parcel boundaries result in a need to increase the permitted area for any of the facilities, revisions to the respective solid waste facilities permits would be required. Prior to implementation of such a change, the operator shall submit an application package for a solid waste facilities permit revision pursuant to 27 CCR Section 21570 for processing by the LEA, pursuant to 27 CCR Section 21650.

Solid Waste Regulatory Oversight

The Inyo County Department of Environmental Health Services is the LEA for Inyo County and responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA, Sarah Peterson, at (760) 872-1422 or spetersen@inyocounty.us to discuss the regulatory requirements for the proposed project.

Conclusion

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the IS and EIR and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a

public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision making body.

If you have any questions regarding these comments, please contact me at (916) 341-6801 or by e-mail at Kelsey.Orr@CalRecycle.ca.gov.

Sincerely,



Kelsey Orr, Environmental Scientist
Permitting & Assistance Branch – North Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Eric Kiruja, Supervisor
CalRecycle - Permitting & Assistance Branch – North Unit

Sarah Peterson, LEA
Inyo County Department of Environmental Health Services

Naomi Jensen

From: John Pinckney <jpinckney@inyocounty.us>
Sent: Wednesday, July 20, 2022 11:09 AM
To: Naomi Jensen; John-Carl Vallejo
Subject: FW: Inyo County Landfill EIR

From: Sally Manning <s.manning@bigpinepaiute.org>
Sent: Thursday, February 3, 2022 10:53 AM
To: John Pinckney <jpinckney@inyocounty.us>
Cc: Cathreen Richards <crichards@inyocounty.us>
Subject: RE: Inyo County Landfill EIR

CAUTION: This email originated from outside of the Inyo County Network. DO NOT click links or open attachments unless you recognize and trust the sender. Contact Information Services with questions or concerns.

Thank you John,

Very interesting, and actually disappointing that the county has to go through this CEQA process simply to obtain the land. It's a burden for everyone except DWP.

The letter was addressed to me, but I am hoping that the official AB 52 letter was sent by certified mail to the Tribal Chairperson (L'eau Stewart) at the Big Pine P. O. Box address. The elected Tribal leaders make the decision regarding entering into consultation. We are all still getting used to this law.

Sally

Sally Manning, Environmental Director
Big Pine Paiute Tribe of the Owens Valley
P. O. Box 700
825 S. Main St.
Big Pine, CA 93513
(760) 938-2003 ext. 233
s.manning@bigpinepaiute.org

From: John Pinckney [<mailto:jpinckney@inyocounty.us>]
Sent: Thursday, February 3, 2022 10:06 AM
To: Sally Manning <s.manning@bigpinepaiute.org>
Subject: Inyo County Landfill EIR

Good Morning,

I am forwarding two documents for your review. One is a cover letter with an offer of consultation (AB52) on our upcoming EIR. The second is a Notice of Preparation and Notice of Public Scoping Meeting for the Draft EIR. I have also mailed hard copy of these documents.

Regards,
John Pinckney
Deputy Director
Inyo County Public Works
168 N. Edwards St.
P.O. Drawer Q
Independence, CA 93526
760-878-0207 Direct
541-948-0669 Cell



APPENDIX B

NATIONAL WETLAND INVENTORY MAPS



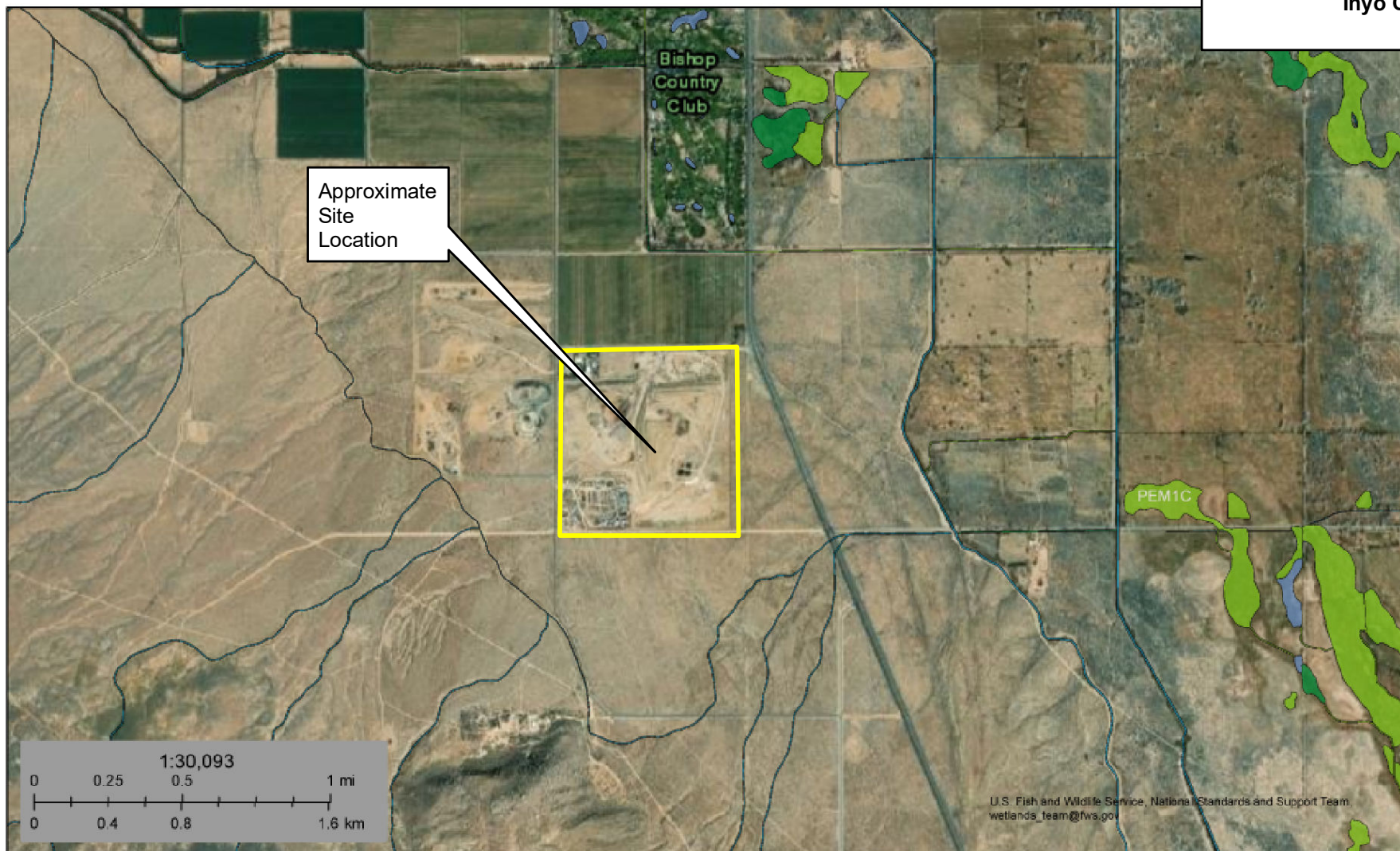
U.S. Fish and Wildlife Service

National Wetlands Inventory



Bishop-Sunland Landfill

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

Bishop-Sunland Landfill
Inyo County

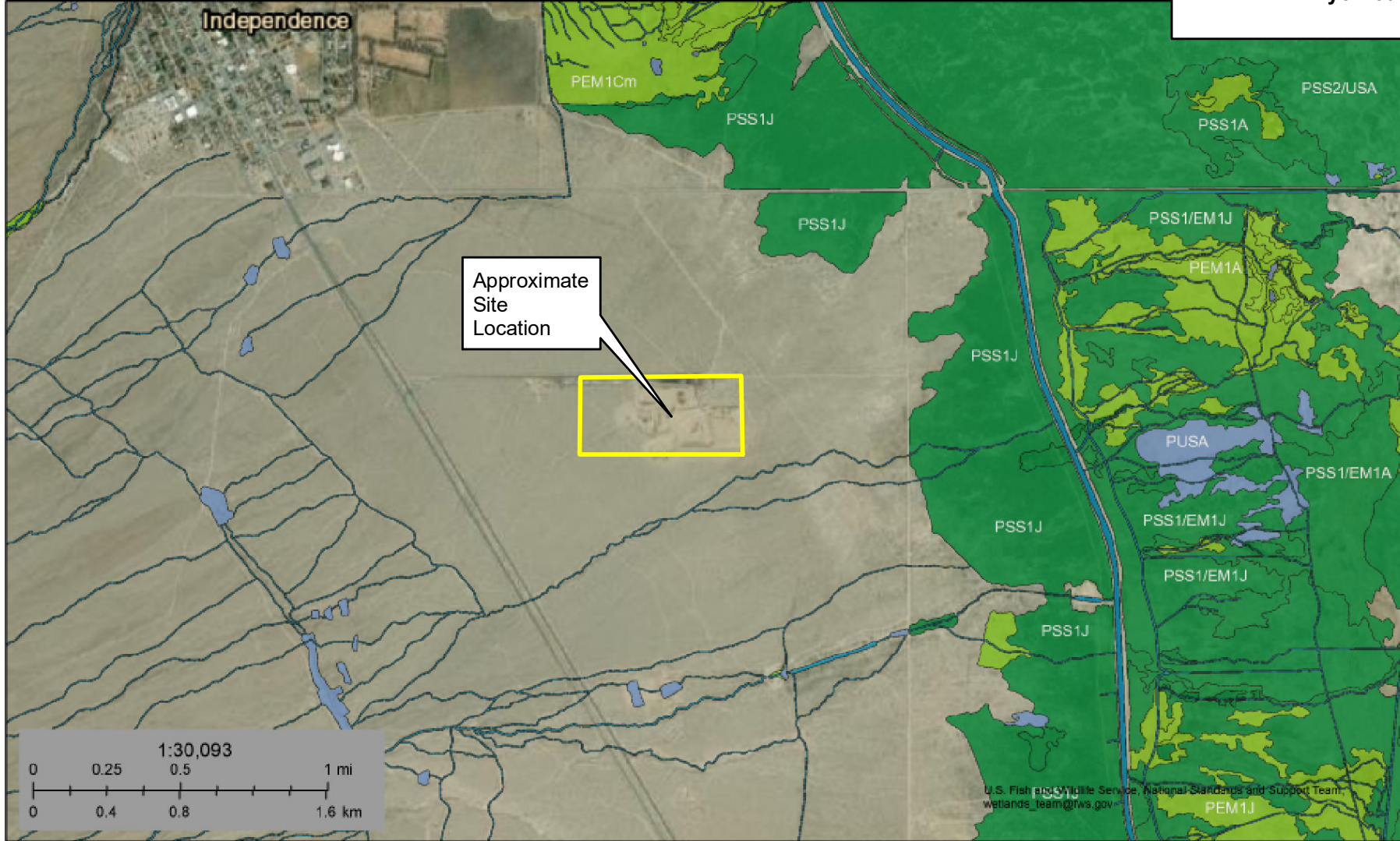


Wetlands

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










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

Wetland data based on 1985 color imagery



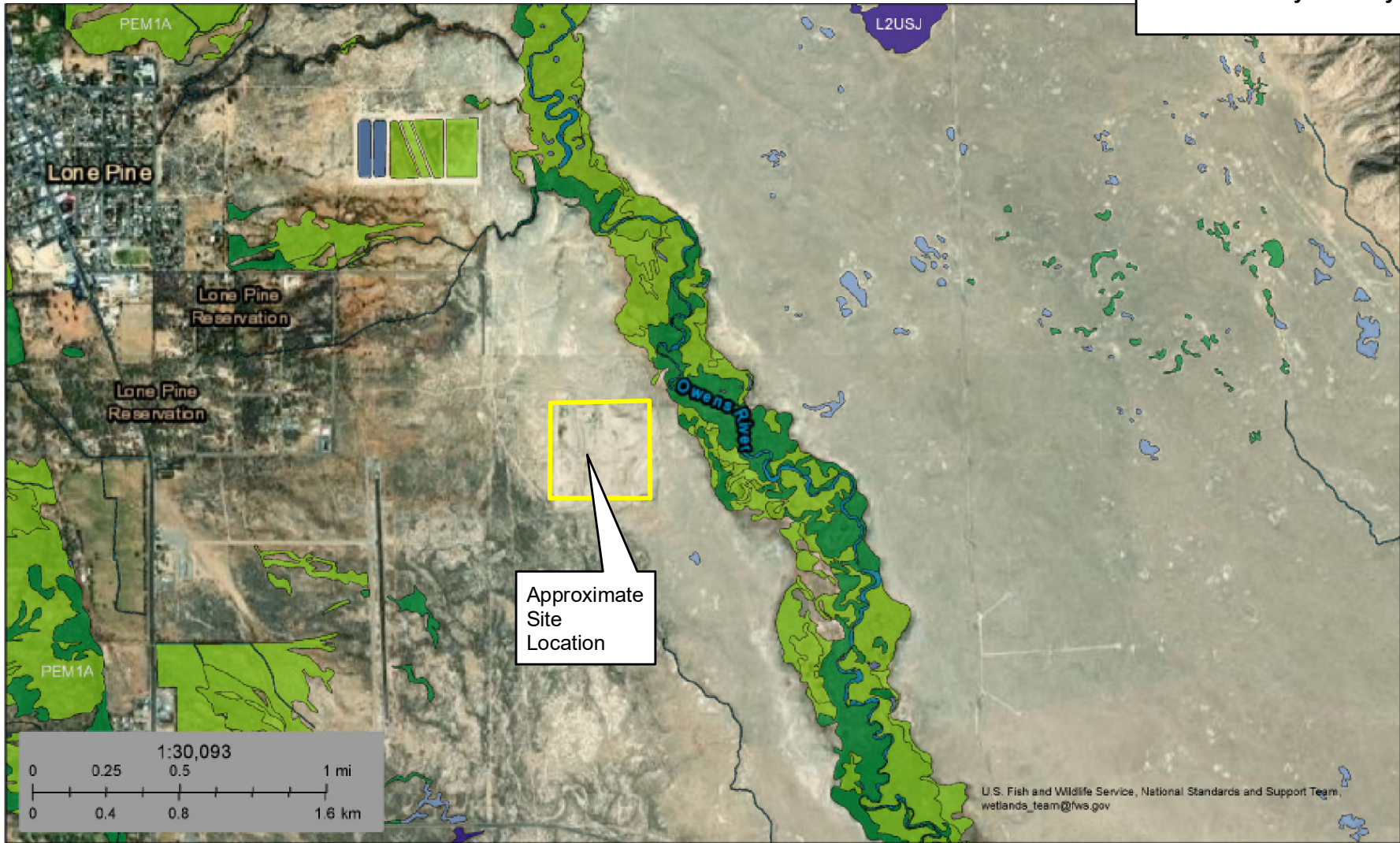
June 17, 2022

Wetlands

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

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

Wetland data based on 1985 color imagery



U.S. Fish and Wildlife Service, National Standards and Support Team,
wetlands_team@fws.gov

June 17, 2022

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

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

Wetland data based on 1985 color imagery

APPENDIX C

CNDDDB QUERY TABLES AND MAPS

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

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

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

SSC = California Species of special Concern

CNPS: 1B = Rare or Endangered in California and elsewhere

2B = Rare and Endangered in California, more common elsewhere

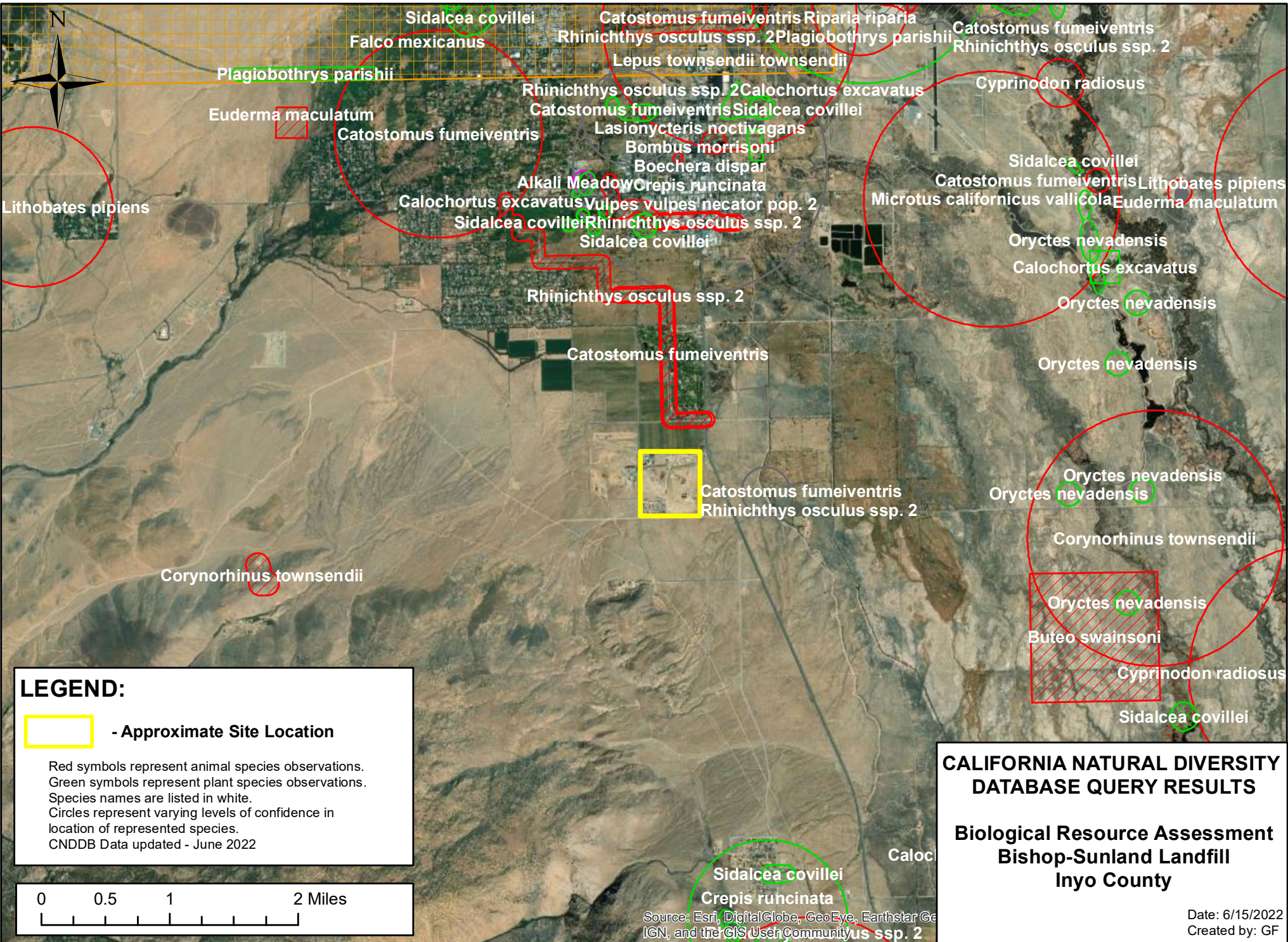
3 = Need more information

4 = Limited distribution or infrequent throughout a broader area in California.

0.1 = Seriously threatened in California (high degree/immediacy of threat)

0.2 = Fairly threatened in California (moderate degree/immediacy of threat)

0.3 = Not very threatened in California (low degree/immediacy of threats or no current threats known)



Sidalcea covillei
Falco mexicanus
Plagiobothrys parishii
Euderma maculatum
Lithobates pipiens
Corynorhinus townsendii
Catostomus fumeiventris
Rhinichthys osculus ssp. 2
Calochortus excavatus
Sidalcea covillei
Lasionycteris noctivagans
Bombus morrisoni
Boechera dispar
 Alkali Meadow
Orepis runcinata
Calochortus excavatus
Vulpes vulpes necator pop. 2
Sidalcea covillei
Rhinichthys osculus ssp. 2
Sidalcea covillei
Rhinichthys osculus ssp. 2
Catostomus fumeiventris
Catostomus fumeiventris
Rhinichthys osculus ssp. 2
Catostomus fumeiventris
Rhinichthys osculus ssp. 2
Sidalcea covillei
Crepis runcinata
Sidalcea covillei
Catostomus fumeiventris
Rhinichthys osculus ssp. 2
Plagiobothrys parishii
Lepus townsendii townsendii
Riparia riparia
Catostomus fumeiventris
Rhinichthys osculus ssp. 2
Calochortus excavatus
Cyprinodon radiosus
Catostomus fumeiventris
Rhinichthys osculus ssp. 2
Sidalcea covillei
Catostomus fumeiventris
Lithobates pipiens
Microtus californicus valliicola
Euderma maculatum
Oryctes nevadensis
Calochortus excavatus
Oryctes nevadensis
Oryctes nevadensis
Oryctes nevadensis
Oryctes nevadensis
Oryctes nevadensis
Oryctes nevadensis
Corynorhinus townsendii
Oryctes nevadensis
Buteo swainsoni
Cyprinodon radiosus
Sidalcea covillei
Caloc

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

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

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

SSC = California Species of special Concern

CNPS: 1B = Rare or Endangered in California and elsewhere

2B = Rare and Endangered in California, more common elsewhere

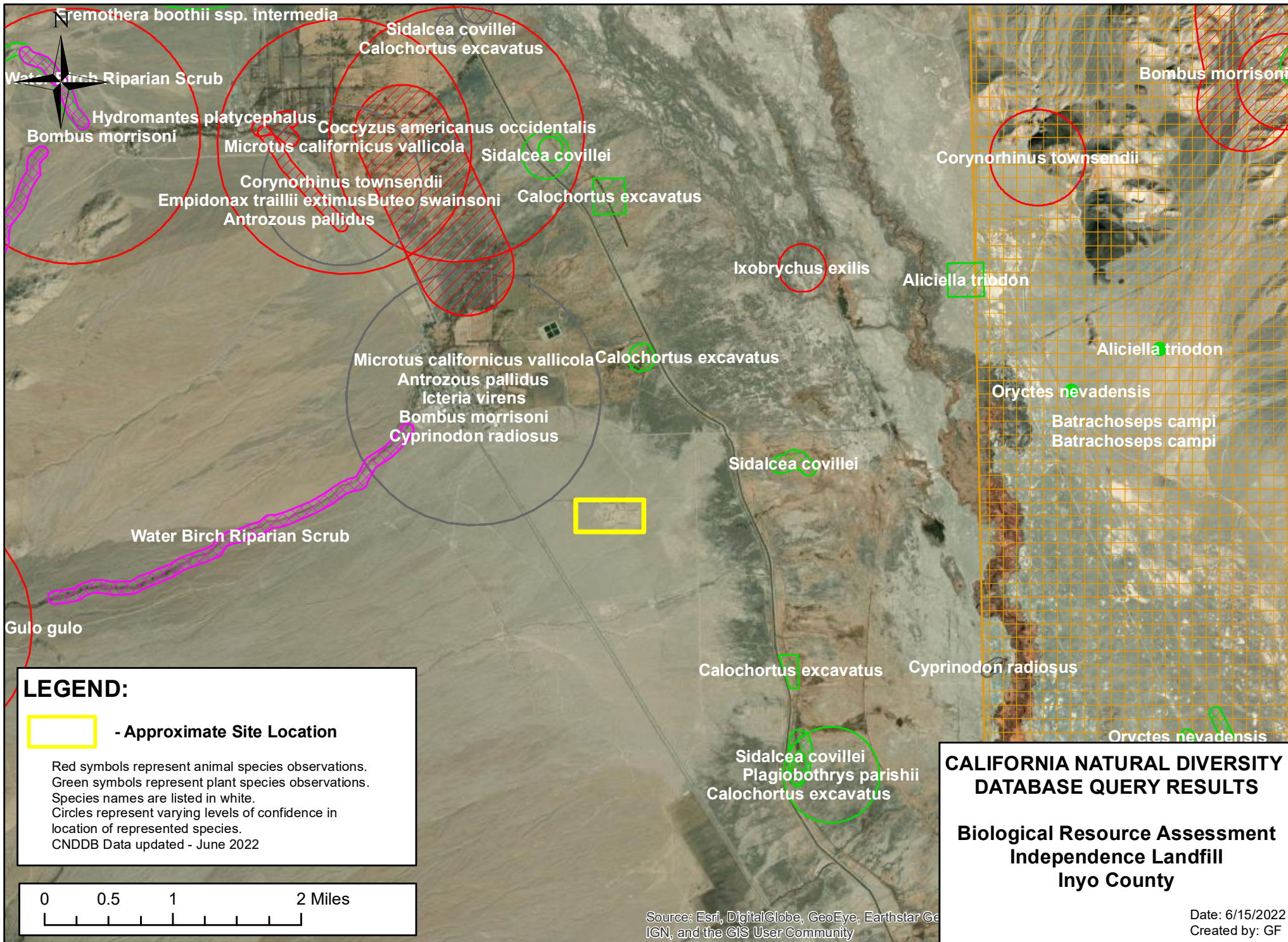
3 = Need more information

4 = Limited distribution or infrequent throughout a broader area in California.

0.1 = Seriously threatened in California (high degree/immediacy of threat)

0.2 = Fairly threatened in California (moderate degree/immediacy of threat)

0.3 = Not very threatened in California (low degree/immediacy of threats or no current threats known)



Fremothera boothii ssp. *intermedia*

Sidalcea covillei
Calochortus excavatus

Water Birch Riparian Scrub

Hydromantes platycephalus
Bombus morrisoni

Coccyzus americanus occidentalis
Microtus californicus vallicola

Corynorhinus townsendii
Empidonax traillii extimus
Buteo swainsoni
Antrozous pallidus
Sidalcea covillei
Calochortus excavatus

Corynorhinus townsendii

Bombus morrisoni

Ixobrychus exilis

Aliciella triodon

Microtus californicus vallicola
Antrozous pallidus
Icteria virens
Bombus morrisoni
Cyprinodon radiosus
Calochortus excavatus

Aliciella triodon

Oryctes nevadensis

Batrachoseps campi
Batrachoseps campi

Water Birch Riparian Scrub

Sidalcea covillei

Gulo gulo

Calochortus excavatus *Cyprinodon radiosus*

Oryctes nevadensis

Sidalcea covillei
Plagiobothrys parishii
Calochortus excavatus

**CALIFORNIA NATURAL DIVERSITY
DATABASE QUERY RESULTS**

**Biological Resource Assessment
Independence Landfill
Inyo County**

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, AeroGRID, IGN, and the GIS User Community

Date: 6/15/2022
Created by: GF

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

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

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

SSC = California Species of special Concern

CNPS: 1B = Rare or Endangered in California and elsewhere

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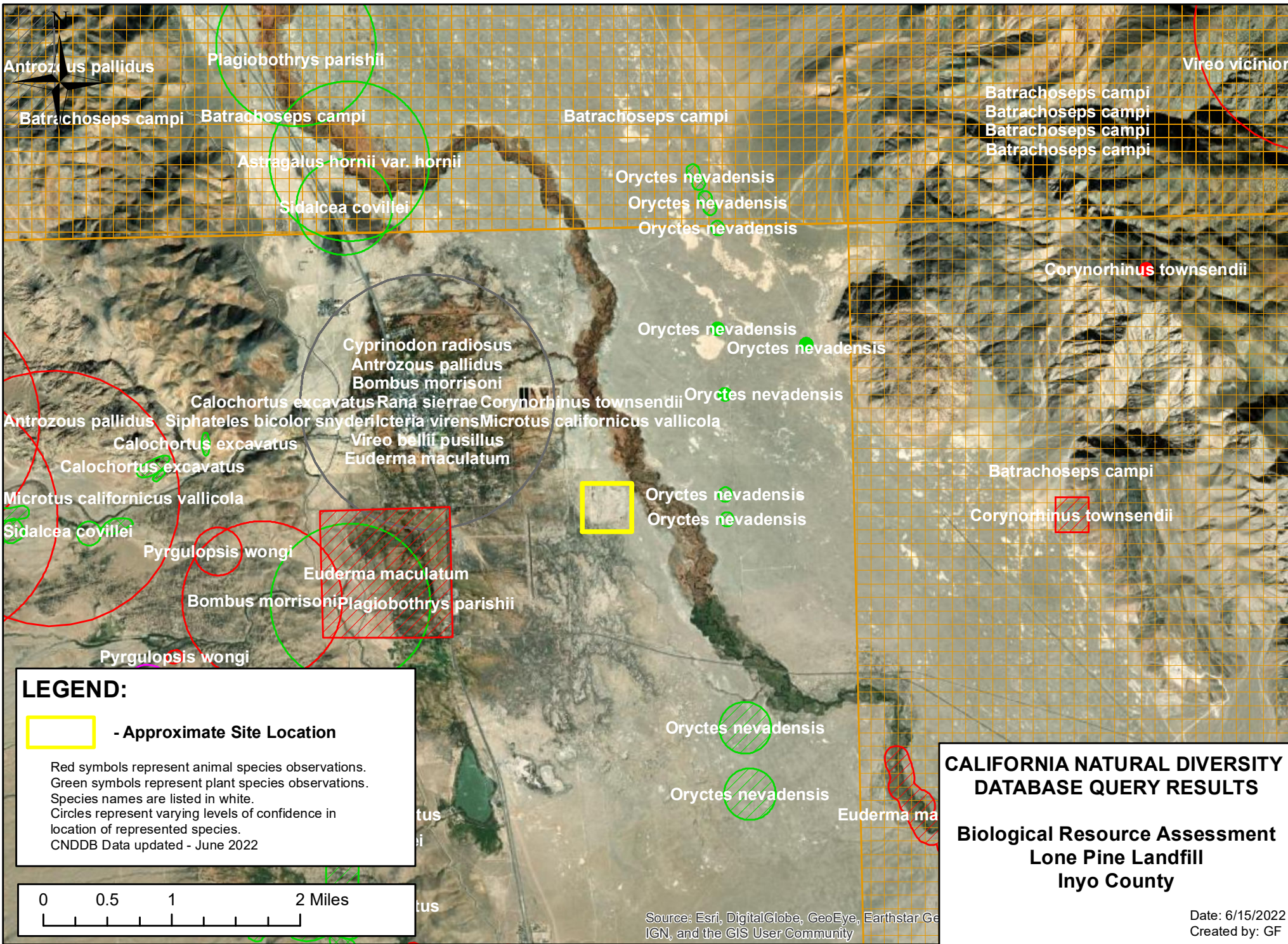
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Antrozous pallidus

Plagiobothrys parishii

Vireo vicinior

Batrachoseps campi

Batrachoseps campi

Batrachoseps campi

Batrachoseps campi
Batrachoseps campi
Batrachoseps campi
Batrachoseps campi

Astragalus hornii var. *hornii*

Oryctes nevadensis
Oryctes nevadensis
Oryctes nevadensis

Sidalcea covillei

Corynorhinus townsendii

Cyprinodon radiosus
Antrozous pallidus
Bombus morrisoni

Oryctes nevadensis
Oryctes nevadensis

Calochortus excavatus *Rana sierrae* *Corynorhinus townsendii* *Oryctes nevadensis*

Antrozous pallidus *Siphateles bicolor* *Snyderilcteria virens* *Microtus californicus vallicola*

Calochortus excavatus
Vireo bellii pusillus
Euderma maculatum

Batrachoseps campi

Calochortus excavatus

Oryctes nevadensis
Oryctes nevadensis

Corynorhinus townsendii

Microtus californicus vallicola

Sidalcea covillei

Pyrgulopsis wongi

Euderma maculatum

Bombus morrisoni *Plagiobothrys parishii*

Pyrgulopsis wongi

Oryctes nevadensis

Oryctes nevadensis

Euderma ma

LEGEND:

 - Approximate Site Location

Red symbols represent animal species observations.
 Green symbols represent plant species observations.
 Species names are listed in white.
 Circles represent varying levels of confidence in location of represented species.
 CNDDDB Data updated - June 2022

0 0.5 1 2 Miles

**CALIFORNIA NATURAL DIVERSITY
 DATABASE QUERY RESULTS**

**Biological Resource Assessment
 Lone Pine Landfill
 Inyo County**

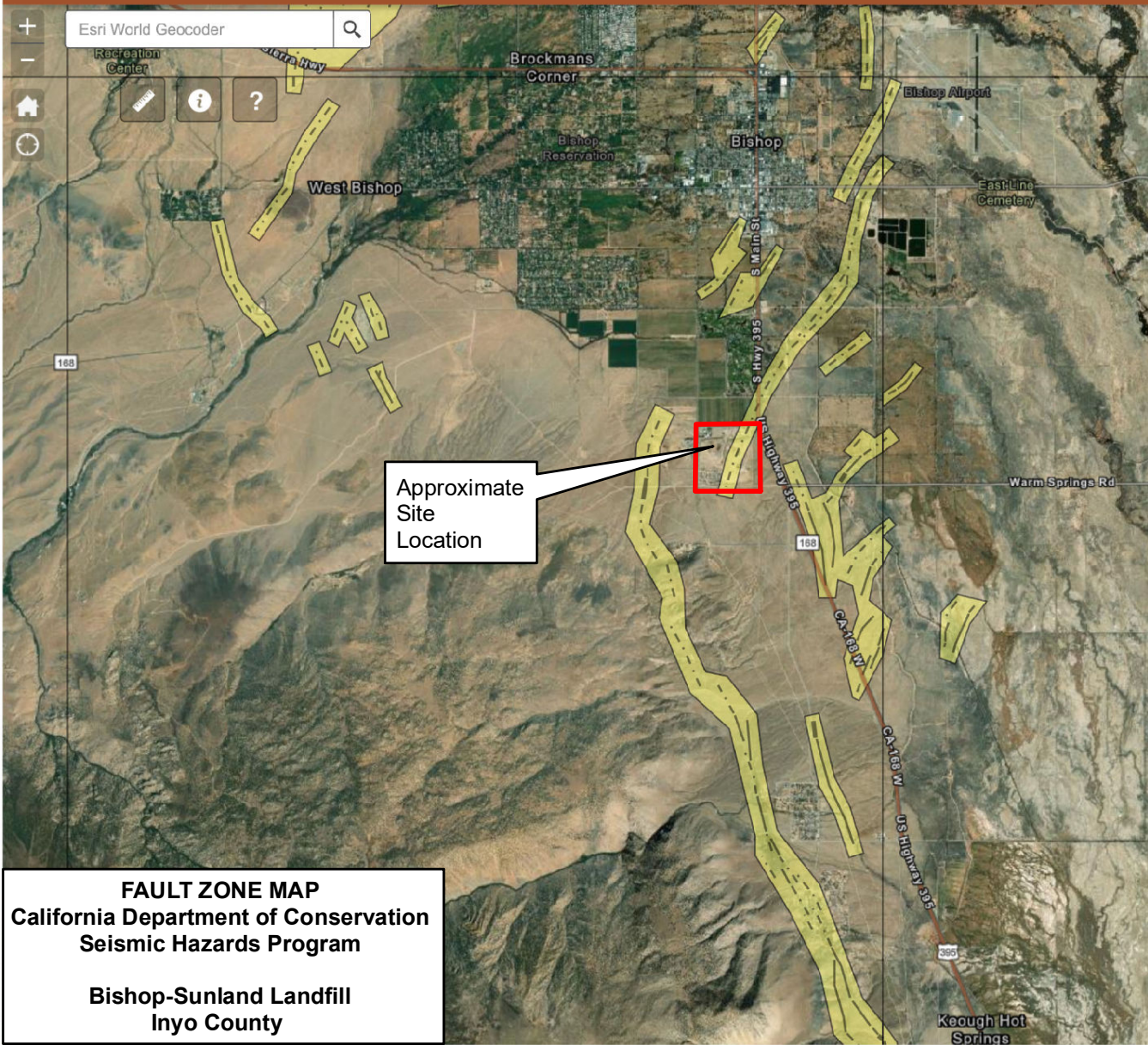
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, IGN, and the GIS User Community

Date: 6/15/2022
 Created by: GF

APPENDIX D

EARTHQUAKE FAULT ZONE MAPS

Earthquake Zones of Required Investigation



Approximate Site Location

FAULT ZONE MAP
 California Department of Conservation
 Seismic Hazards Program

 Bishop-Sunland Landfill
 Inyo County

Legend

Colors may vary due to transparency and overlapping data.

Fault Traces

- Accurately Located
- - - Approximately Located
- · - · - Approximately Located, Queried
- - - - Inferred
- · - · - Inferred, Queried
- · · · · Concealed
- · · · · Concealed, Queried
- - - Aerial Photo Lineament

Fault Zone

- Yellow box

Liquefaction Zone

- Green box

Landslide Zone

- Blue box

Liquefaction Landslide Overlap Zone

- Orange box

Area Not Evaluated for Liquefaction or Landslides

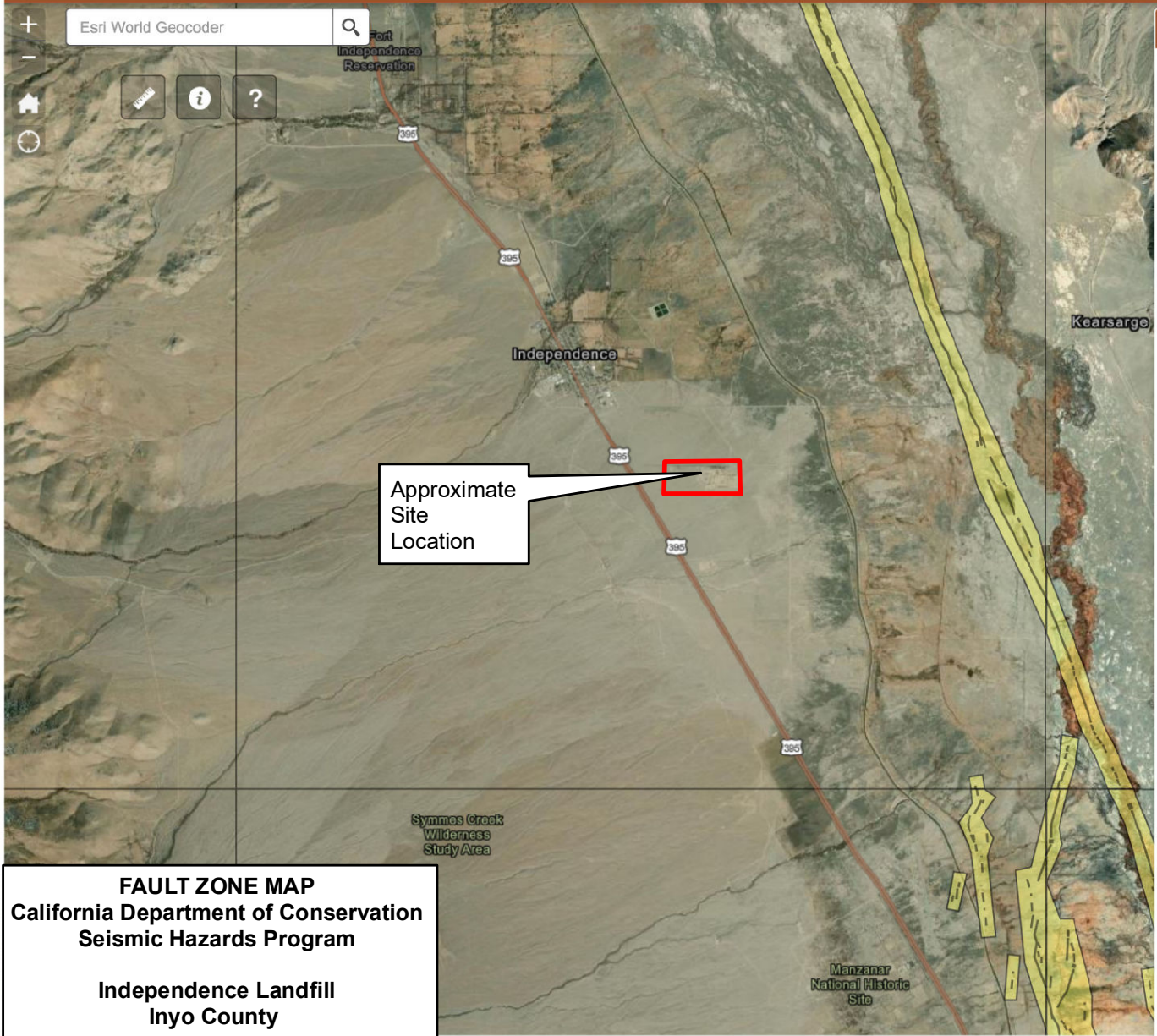
- White box

Parcels

- Red box: Parcel is in an Earthquake Fault Zone, a Liquefaction Zone, and a Landslide Zone
- Green box: Parcel is in an Earthquake Fault Zone and a Liquefaction Zone
- Blue box: Parcel is in an Earthquake Fault Zone and a Landslide Zone
- Yellow box: Parcel is in an Earthquake Fault Zone
- Orange box: Parcel is in a Liquefaction Zone and Landslide Zone
- Light Green box: Parcel is in a Liquefaction Zone
- Light Blue box: Parcel is in a Landslide Zone
- White box: Parcel is not in a zone or has not been evaluated

1mi
 -118.339 37.337 Degrees

Earthquake Zones of Required Investigation



Legend

Colors may vary due to transparency and overlapping data.

Fault Traces

- Accurately Located
- - - Approximately Located
- · - - Approximately Located, Queried
- - - - Inferred
- · - - - Inferred, Queried
- · · · · Concealed
- · · · · · Concealed, Queried
- - - Aerial Photo Lineament

Fault Zone

- Yellow shaded area

Liquefaction Zone

- Green shaded area

Landslide Zone

- Blue shaded area

Liquefaction Landslide Overlap Zone

- Orange shaded area

Area Not Evaluated for Liquefaction or Landslides

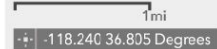
- White area

Parcels

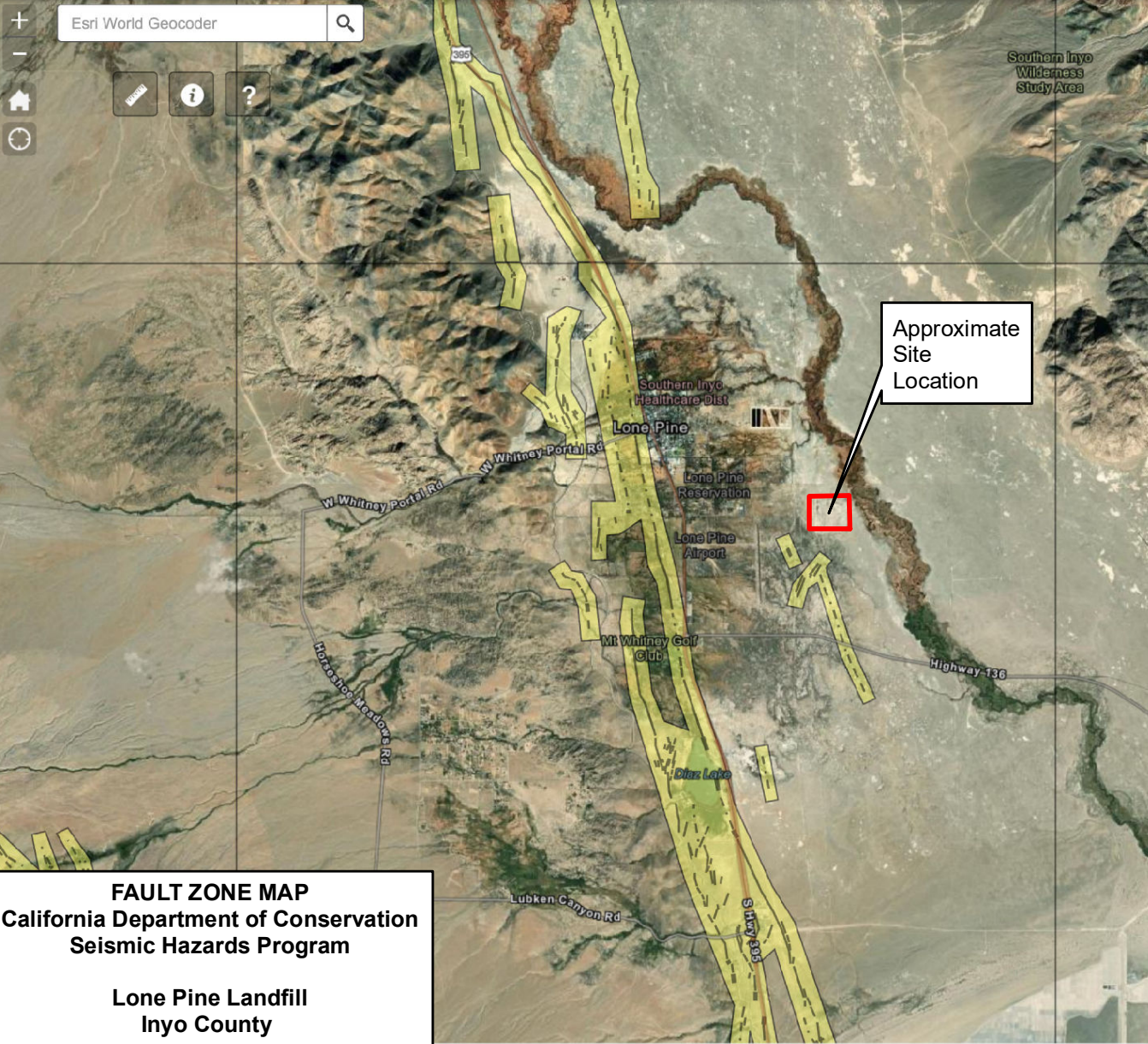
- Red shaded area: Parcel is in an Earthquake Fault Zone, a Liquefaction Zone, and a Landslide Zone
- Green shaded area: Parcel is in an Earthquake Fault Zone and a Liquefaction Zone
- Blue shaded area: Parcel is in an Earthquake Fault Zone and a Landslide Zone
- Yellow shaded area: Parcel is in an Earthquake Fault Zone
- Orange shaded area: Parcel is in a Liquefaction Zone and Landslide Zone
- Light green shaded area: Parcel is in a Liquefaction Zone
- Light blue shaded area: Parcel is in a Landslide Zone
- White shaded area: Parcel is not in a zone or has not been evaluated

FAULT ZONE MAP
California Department of Conservation
Seismic Hazards Program

Independence Landfill
Inyo County



Earthquake Zones of Required Investigation



Legend

Colors may vary due to transparency and overlapping data.

Fault Traces

- Accurately Located
- - - Approximately Located
- · - Approximately Located, Queried
- - - Inferred
- · - Inferred, Queried
- · · Concealed
- · · Concealed, Queried
- - - Aerial Photo Lineament

Fault Zone

- Yellow box

Liquefaction Zone

- Green box

Landslide Zone

- Light blue box

Liquefaction Landslide Overlap Zone

- Orange box

Area Not Evaluated for Liquefaction or Landslides

- White box

Parcels

- Red box: Parcel is in an Earthquake Fault Zone, a Liquefaction Zone, and a Landslide Zone
- Green box: Parcel is in an Earthquake Fault Zone and a Liquefaction Zone
- Blue box: Parcel is in an Earthquake Fault Zone and a Landslide Zone
- Yellow box: Parcel is in an Earthquake Fault Zone
- Orange box: Parcel is in a Liquefaction Zone and Landslide Zone
- Light green box: Parcel is in a Liquefaction Zone
- Light blue box: Parcel is in a Landslide Zone
- Grey box: Parcel is not in a zone or has not been evaluated

FAULT ZONE MAP
California Department of Conservation
Seismic Hazards Program

Lone Pine Landfill
Inyo County

