

DRAFT NEGATIVE DECLARATION

CITY OF BISHOP 2019-2027 HOUSING ELEMENT UPDATE



I. PROJECT INFORMATION

Title: City of Bishop 2019-2027 Housing Element Update
Description: The 2019-2027 Housing Element Update analyzes housing resources and housing needs and sets forth the City's plan for preserving, improving and developing housing as needed to comply with the City's share of regional housing needs, as identified by the California Department of Housing and Community Development (HCD).
Sponsor: The City of Bishop
Address: Post Office Box 1236, 377 West Line Street, Bishop, CA 93515
Contact: Elaine Kabala, Planning/Economic Development, City of Bishop, 760-873-8458

II. PROJECT APPLICANT

The City of Bishop is the Lead Agency and project sponsor:

City of Bishop Planning Department
377 West Line Street ♦ Bishop, CA 93514
Contact: Elaine Kabala, Associate Planner

III. GENERAL PLAN LAND USE AND ZONING DESIGNATIONS

The 2019-2027 City of Bishop Housing Element Update reviews housing conditions and sets forth goals and policies on a city-wide basis. As a result, land use and zoning designations are not applicable for adoption of a Housing Element Update.

IV. PUBLIC NOTICE, PUBLIC REVIEW PERIOD, and PUBLIC MEETING

This document is provided for review and comment by responsible agencies and by the general public. This is an informational document that analyzes the potential environmental effects associated with adoption by the Bishop City Council of the 2019-2027 Housing Element Update. As the decision-making body, the Bishop City Council will review and determine whether this Negative Declaration complies with requirements of the California Environmental Quality Act (CEQA). The City Council will make its CEQA determination before considering whether to approve the 2019-2027 Housing Element Update. The City Council is expected to consider adoption of the Negative Declaration and approval of the 2019-2027 Housing Element Update during August of 2021. **IF YOU HAVE COMMENTS on the adequacy of this Negative Declaration or on the finding that the project will not have a significant adverse impact on the environment, please send your comments by mail or email to:**

City of Bishop
P.O. Box 1236
Bishop, CA 93515
Contact: Elaine Kabala
EKabala@CityofBishop.com ♦ 760.873.8458

COMMENTS on this draft Negative Declaration will be received for a 30-day period, beginning on May 3, 2021 and continuing through June 2, 2021. A ZOOM PUBLIC MEETING is tentatively scheduled to be held on May 8, 2021 beginning at 6:00 pm. The meeting will be held during the 30-day public review period, to invite public discussion and comments on this Negative Declaration and the findings and recommendations in the draft 2019-2027 Housing Element Update. The CITY COUNCIL is expected to consider whether to adopt this Negative Declaration and approve the proposed 2019-2027 Housing Element update during August 2021. Dates for all public hearings and public meetings will be posted on the City's website at <https://www.cityofbishop.com/>.

V. PROJECT LOCATION

The City of Bishop is a small and scenic community located on the eastern slopes of the Sierra Nevada in the northernmost part of Inyo County. The City is situated at the junction of US 6 and US 395. US 6 is a transcontinental highway that begins in Bishop on the west, and continues to Provincetown, Massachusetts in the east. US 395 begins in the Mojave Desert (at Interstate 15 near Hesperia), and continues north into British Columbia, Canada (where it becomes Highway 395). The two highways are major sources of tourist, recreation and commercial traffic for Bishop and surrounding eastern Sierra communities and destinations. Located approximately 275 miles north of San Bernardino and 35 miles southeast of the Town of Mammoth Lakes (in Mono County), Bishop is the only incorporated City in Inyo County. The Inyo County seat is in Independence, about 42 miles south of Bishop. This 2019-2027 Housing Element update includes all lands in the City of Bishop corporation boundary, as shown in Exhibit 1.

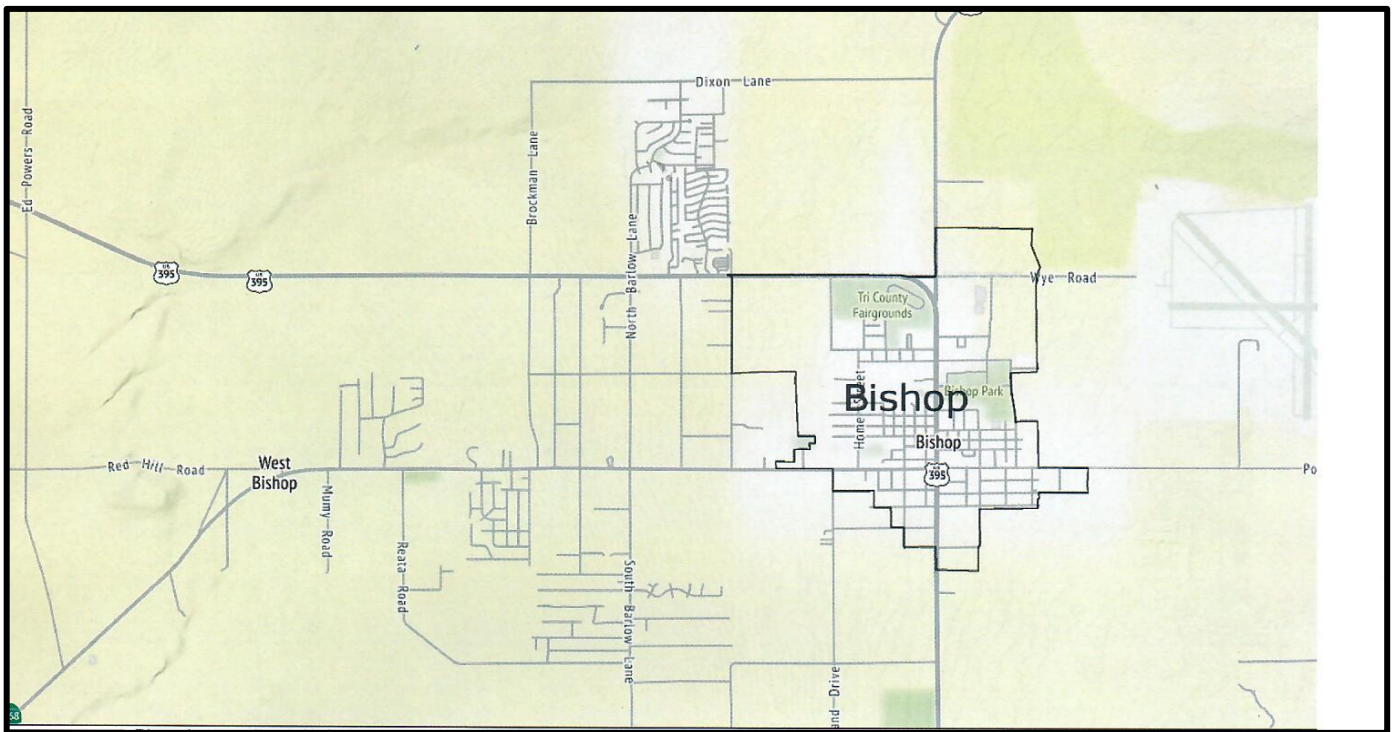


EXHIBIT 1. Bishop City Limits

VI. PLANNING CONTEXT

The Housing Element is one of nine elements that are included in the City of Bishop General Plan. Additional Bishop General Plan elements address Parks and Recreation, Public Services, Mobility, Conservation/Open Space, Noise, Safety, Land Use, and Economic Development. Residential land uses identified in the Land Use Element provide the primary basis for identification of adequate residential sites in the Housing Element.

Since 2014, the City has completed or undertaken significant additional planning efforts that will shape success in meeting future Housing Element goals. The City completed a new Economic Development Element in 2015 that identifies adequate housing as a critical component to the City's economic strength. Building on recommendations in the Economic Development Element, the City in 2020 prepared a draft Downtown Specific Plan ('DTSP') that emphasizes mixed use development as a central tool for revitalizing the core downtown area. The DTSP is expected to be finalized during 2022, and will be followed directly by a Zoning Code amendment to reflect the updated land uses and land use standards in the adopted DTSP.

VII. PUBLIC OUTREACH

The 2019-2027 Housing Element Update has been widely publicized in Bishop, including English and Spanish language notices, to inform interested agencies and citizens about the process and invite comment and participation. A virtual public

meeting was held in March 2021, during preparation of the Draft Housing Element, and a Housing Survey was posted on the City's website between March 16-30 to invite public comments and recommendations for the Housing Element program and priorities. Seventy-seven (77) responses to the Housing Survey were received in total; survey results are presented and discussed in Housing Element §I.D (beginning on page 8). Additionally, the City Council reviewed and approved the Draft Housing Element Goals and Actions (subject to revisions that were subsequently incorporated) during the regularly-scheduled meeting on April 12.

A third public meeting will be held in late May, during the 30-day Negative Declaration review and comment period. Responses will be prepared to address substantive comments received from stakeholders and agencies by the close of the ND review period. The complete record of information will be sent to the Planning Commission for review during July 2021, during which a public hearing will be held as the Commission develops its recommendations to the City Council. The Housing Element and CEQA document will then be considered by the City Council, during August 2021, and Council deliberations will occur in a final public hearing. At each step, residents and stakeholders are encouraged to contact City staff and/or the CEQA consultant to offer recommendations and ask questions concerning all aspects of the 2019-2027 Housing Element update.

VIII. RELATED STUDIES AND DOCUMENTS

The current Housing Element Update is based upon the land use plans and policies set forth in the City of Bishop General Plan Land Use Element prepared in 1992, and more specifically on the housing goals and objectives expressed in the 2014-2019 City of Bishop Housing Element. The update also draws upon information provided by HCD including (a) a Demographic Data Package, (b) a letter setting forth the Final Housing Need Determination for Inyo County for the period from December 31, 2018 through April 30, 2029, dated 20 April 2020, (c) a letter outlining the Requirements of AB 686 (Affirmatively Furthering Fair Housing), dated 23 April 2020, and (d) a Powerpoint Presentation, *New Laws, Deeper Dive*, dated 3 March 2021. Additional references and source materials are as cited throughout the Draft 2019-2027 City of Bishop Housing Element and this Initial Study. All reports and documents referenced in this Initial Study are on file with the City of Bishop, Planning Department, Post Office Box 1236, 377 West Line Street, Bishop, CA 93515. A digital copy of this Housing Element is available on the City website: <https://www.cityofbishop.com/>

IX. PROJECT DESCRIPTION

The proposed project is a comprehensive update of the Housing Element of the General Plan for the City of Bishop, in accordance with California law. Article 10.6 of the California Government Code (CGC), enacted in 1981 and commonly referred to as the Roos Bill, describes the content requirements of local housing elements. The legislation requires local housing elements to include an assessment of housing needs, an inventory of resources and constraints, a statement of goals, policies and objectives, and a housing program through the term of the Housing Element update (2027). The Guidelines outline the content requirements of housing elements, and give HCD authority for review and comment on local housing elements.

The legislation also requires that the housing element be updated on a specific schedule set by HCD. For Bishop, the Housing Element update must be completed every eight years. As with each update, the next Bishop Housing Element will address the progress made on achieving the goals and objectives stated in the previous Housing Element.

In the broadest context, the purpose of the Housing Element is to assess local housing problems, to analyze programs that assist in providing adequate housing for all segments of the community, and to identify specific actions to increase housing supply and alleviate housing issues and constraints and to meet Bishop's share of overall Inyo County housing needs. The City's housing goals are shaped by a Regional Housing Needs Assessment (RHNA), prepared by HCD. The RHNA quantifies the need for housing in each jurisdiction in a given timeframe. HCD has identified a RHNA of 118 new units in the City of Bishop over the 2019-2027 planning period.

In turn, the RHNA is prepared to comply with five statutory objectives that include (1) increase the housing supply and the mix of housing types, tenure, and affordability; (2) promote infill development and socioeconomic equity, protection of environmental and agricultural resources, encouraging efficient development patterns, and achievement of the state's greenhouse gas reduction targets; (3) promote an improved intraregional relationship between jobs and housing; (4) allocate a lower proportion of housing to an income category when a jurisdiction already has a disproportionately high share of households in that income category; and (5) affirmatively further fair housing.

In comparison with the prior 2014-2019 Housing Element update, the current 2019-2027 Housing Element Update includes a number of important changes. Many of the changes are a direct response to new California legislative requirements

governing the preparation of Housing Elements, and the fulfillment of housing needs in accordance with current mandates. Legislation adopted since 2014 has created new opportunities and requirements including laws addressing accessory dwelling units, surplus government lands, fair housing, housing assistance for disadvantaged individuals, density bonuses, streamlining of approval processes for qualified projects, and many other issues.

As was true in prior Housing Elements, the majority of vacant land in the City of Bishop planning area is owned by the City of Los Angeles Department of Water and Power ('LADWP'). Reflecting a priority on water conservation, LADWP has for many years implemented restrictive growth policies that limit the potential for new development in Bishop. However, the City and LADWP have forged an ongoing, increasingly productive relationship that has and will continue to facilitate the achievement of key goals and objectives, including the need for housing that responds to a broad spectrum of income levels. Cooperation between the City of Bishop and the City of Los Angeles will continue to be very important to the success of the City's Housing Element goals and actions.

Regional Housing Need Determination. Table 1 shows the City of Bishop's RHNA housing allocations for the prior planning period (2012-2018). As shown, HCD's goal for new housing construction in Bishop during that period was set at 65 units (about 11 units each year). Also shown in Table 1 are the RHNA allocations for Bishop for the current planning period (2018-2029), which includes an overall goal for new construction of 118 housing units (also about 11 units per year). Data for both planning periods includes the RHNA allocations for other areas of Inyo County, and Inyo County as a whole, by income group.

TABLE 1. Summary of RHNA Goals for the City of Bishop for the 2014-2019 & 2019-2027 Housing Element Updates						
Income Group	TOTAL NEED PER REGIONAL HOUSING ALLOCATION MODEL					
	Bishop 2012-2018 RHNA	Bishop 2018-2029 RHNA	Other Inyo Co. 2012-2018 RHNA	Other Inyo Co. 2018-2029 RHNA	TOTAL INYO CO. 2012-2018 RHNA	TOTAL INYO CO. 2018-2029 RHNA
Very Low	15	24	35	46	50	70
Other Lower	10	20	25	40	35	60
Moderate	12	21	28	39	40	60
Above Moderate	28	53	72	80	100	133
TOTAL	65	118	160	205	566	323

Table 2 summarizes the extent to which the City of Bishop accomplished the numeric objectives for each of the primary RHNA housing categories during the period from 2014-2019.

TABLE 2. City of Bishop RHNA Compliance for the 2014-2019 Housing Element Cycle.										
Income Level		RHNA by Income Level	2014	2015	2016	2017	2018	2020	Total (all years)	Total UNMET RHNA by Income Level
Very Low	Deed Restricted	15							0	15
	Non-Deed Restricted									
Low	Deed Restricted	10		1					6	4
	Non-Deed Restricted						5			
Moderate	Deed Restricted	12							11	1
	Non-Deed Restricted			2	6		3			
Above Moderate		28					1		1	27
Total RHNA		65								
Total Units				3	6		1	8	18	47
<i>Note: units serving extremely low-income households are included in the very low-income permitted unit totals.</i>										

Residential Sites Inventory: State law requires that jurisdictions demonstrate in the housing element that the land inventory is adequate to accommodate that jurisdiction's share. A jurisdiction may meet the RHNA requirement by focusing potential development on suitable vacant and/or non-vacant sites within the community. A jurisdiction must document how zoning and development standards on the proposed sites facilitate housing to accommodate the remaining RHNA requirement. The complete inventory (presented in the Draft Housing Element) indicates that the residential site inventory will be adequate to meet the City of Bishop RHNA for the current 2019-2027 Housing Element cycle.

Housing Plan. As required by State Housing Element law, the proposed Housing Element Update includes a Plan to facilitate and encourage the provision of housing consistent with the RHNA. The plan would implement strategies and programs intended to address housing-related issues and ensure that all Bishop residents have a decent, affordable and safe place to live. The City of Bishop's programs and proposed goals and actions are structured to address the five issue areas outlined by State law: (1) Conserving and Improving the Condition of the Existing Housing Stock, (2) Assisting in the Development of Affordable Housing Opportunities, (3) Providing Adequate Sites to Achieve a Variety of Housing Types and Densities, (4) Removing Governmental Constraints and strengthening opportunities, and (5) Affirmatively Furthering Fair Housing.

The City's action plan for the 2019-2027 planning period includes the following key programs: (1) development of the 2.9-acre Silver Peaks project site (with at least 72 units), (2) finalization of the Downtown Specific Plan ("DTSP") that will emphasize mixed-use development and flexible parking standards with opportunities for enhanced pedestrian and bicycle circulation, (3) an amendment to the Bishop Municipal Code, to reflect the new land uses and land use standards associated with the DTSP (following final DTSP approval) and to modify or eliminate standards that unnecessarily limit housing supply, (4) strengthening the incentives for development of Accessory Dwelling Units (ADUs) and Junior ADUs, including preparation of at least ADU floor plan and set of construction plans that can be provided free of cost to Bishop residents, (5) obtaining credits for qualified rehabilitation projects at the Valley Apartments, (6) development of plans for a 15-unit Veterans housing project in the vicinity of the Veterans' Services Office, (7) development of a long-term program for lease or sale of surplus LADWP parcels to the City of Bishop for the purpose of affordable housing development, and a process to share RHNA credits with LADWP, (8) submittal of a formal request to be notified of other public agency surplus lands that could potentially be used for housing development, (9) continued vigorous enforcement of codes that govern short-term rentals, (10) expanded outreach to ensure that residents are informed about housing assistance programs and policies, (11) continued support for the conversion of vacant commercial property into residential uses, (12) incentives for innovative housing designs (such as modular units, prefabricated units and co-living units) that are adapted to limited lot sizes and offer reduced housing costs, and many other activities that will, individually and collectively, support efforts to meet the overall goal of decent, safe and affordable housing for all Bishop residents. A full copy of the Draft Housing Element Update is provided on the City of Bishop website (<https://www.cityofbishop.com/>) in the 'Resident' section.

X. REQUIRED AGENCY APPROVALS

As the decision-making body, the Bishop City Council will review and determine whether this Negative Declaration complies with requirements of CEQA. The City Council will make its CEQA determination before considering whether to approve the 2019-2027 City of Bishop Housing Element Update. The City Council is expected to consider adoption of the Negative Declaration and approval of the 2019-2027 Housing Element Update during August of 2021. HCD will have final approval authority over the City of Bishop 2019-2027 Housing Element Update.

XI. SUMMARY OF ENVIRONMENTAL FACTORS POTENTIAL AFFECTED

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

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology & Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use & Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population & Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Services | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |
| <input checked="" type="checkbox"/> No Significant Effects | | |

XII. DETERMINATION

I find that the proposed 2019-2027 City of Bishop Housing Element Update COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	X
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 the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed project may have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project may have a significant effect on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on the attached sheets if the effect is a "potentially significant impact" or "potentially significant unless mitigated." An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case 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, and nothing further is required.	

Reasons to Support Findings of this Negative Declaration:

1. The 2019-2027 City of Bishop Housing Element Update is a policy document that is programmatic in nature and has been prepared to comply with State Laws. The document outlines how the City of Bishop will meet its proportional share of the Regional Housing Needs Assessment prepared by HCD. The Housing Element Update does not propose or imply approval of any specific development, and no significant environmental impacts would occur as a result of Housing Element approval.
2. All future development associated with Housing Element goals and actions would be subject to planning review based on project-specific development applications and design features, and would also be required to fulfill all applicable requirements of CEQA, as outlined in California PRC §2100 et seq. The attached Initial Study provides a detailed analysis for each topical area.

In summary, impacts resulting from the proposed City of Bishop 2019-2027 Housing Element Update were found to be less than significant in the following areas: Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Transportation/Traffic, Tribal Cultural Resources, Utilities/Service Systems, Wildfire Risk, and Mandatory Findings of Significance.

Elaine Kabala
Signature

4-30-2021
Date

Elaine Kabala
Printed Name and Title

City of Bishop
For

XIII. ENVIRONMENTAL CHECKLIST

XIII-1. AESTHETICS. Except as provided in PRC §21099, would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Have a substantial adverse effect on a scenic vista?			X	
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c. In non-urban areas, substantially degrade the visual character or quality of public views of the site and surroundings as seen from a publicly accessible vantage point? If in an urban area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?			X	

a–d. Less Than Significant Impact. Implementation of the programs contained in the Housing Element Update (Housing Element Update) document would accommodate development required to meet the City’s RHNA, which specifies a need for land appropriately zoned to facilitate the production of 118 residential units. However, the Housing Element Update is a policy document. Its adoption would not, in itself, produce environmental impacts. Any future actions resulted from Housing Element Update policies would be subject to CEQA. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City’s zoning ordinance to quality of development at each housing site. The potential impacts to aesthetics of any specific future residential development projects would be assessed when the projects are actually proposed, and mitigation measures would be adopted if and as necessary, in conformance with CEQA. Based on the above, the Housing Element Update would have a less than significant impact on aesthetics and visual resources.

XIII-2. AGRICULTURE AND FORESTRY RESOURCES. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?				X
c. Conflict with zoning for, or cause rezoning of, forest land (per PRC §1220[g]), timberland (PRC §4526), or timberland zoned Timberland Production (as defined by CGC §51104[g])?				X
d. Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

a–e. No Impact. There is no land in the City of Bishop that is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the State Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (California Department of Conservation 2018),¹ and the City identifies no agricultural or forestry resources in its General Plan Land Use Element² or Conservation/Open Space Element.³ The Housing Element

¹ California Department of Conservation: <https://maps.conservation.ca.gov/DLRP/CIFF/>.

² City of Bishop, Land Use Element:

<https://www.cityofbishop.com/Document%20Center/Department/Planning/General%20Plan/LandUsepacket.pdf>

³ City of Bishop, Conservation/Open Space Element:

Update does not change the potential for agricultural activities. There are also no programs that would conflict with existing agricultural zoning or a Williamson Act contract. Because the City does not contain forest land, there is no rezoning or development proposed on forest land, or timber property zoned as Timberland Production. Based on the above, the Housing Element Update would result in no impacts to agricultural or forest resources. The Housing Element Update is a policy document, consisting of a housing program, and its adoption would not, in itself, produce environmental impacts. Although implementation of the programs contained in the document would accommodate development required to meet the City's RHNA, such development would not impact agricultural resources.

XIII-3. AIR QUALITY. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Conflict with implementation of the applicable air quality plan?			X	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under a federal or state ambient air quality standard?			X	
c. Expose sensitive receptors to substantial pollutant concentrations?			X	
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

a-c. Less Than Significant Impact. Air Quality in the project study area is regulated by federal, state and local requirements and standards. The Great Basin Unified Air Pollution Control District (GBUAPCD) is the regional agency responsible for air quality monitoring in the Owens Valley including Inyo, Mono and Alpine Counties. The Owens Valley PM₁₀ Planning Area ('OVPA,' extending from Aberdeen on the north to the South Haiwee Reservoir on the south) has been designated by the State and by the USEPA as nonattainment for the state and federal 24-hour average PM₁₀ standards. Bishop is not located in the boundaries of the federal PM₁₀ nonattainment area, and implementation of the 2019-2027 Housing Element update would not conflict with or obstruct implementation of the State Implementation Plan.⁴

The potential for growth represented by the City of Bishop Housing Element update is a direct result of state mandates, as expressed in the RHNA for Inyo County and for the City of Bishop. Because no development is currently proposed, the Housing Element Update would not in itself result in air quality impacts, nor would it expose sensitive receptors to substantial pollutant concentrations or result in other emissions (such as odors) with potential for adverse impacts.

When individual housing projects are proposed, the potential for short-term and long-term air quality impacts would be assessed in conformance with the requirements of CEQA, and mitigation measures would be adopted if and as necessary to reduce significant effects to less than significant levels.

XIII-4. BIOLOGICAL RESOURCES. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Have substantial adverse effects on a candidate, sensitive, or special status species per local or regional plans, policies, or regulations, or by the CDFW of USFWS?			X	
b. Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS?			X	
c. Have a substantial adverse impact on protected wetlands (including marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X	
d. Interfere substantially with the movement of a native resident or migratory fish or wildlife species or migratory wildlife corridor,			X	

<https://www.cityofbishop.com/Document%20Center/Department/Planning/General%20Plan/Conservation.pdf>

⁴ GBUAPCD, Proposed Final 2016 Revision to the OVPA: https://gbuapcd.org/Docs/District/GoverningBoard/BoardMeetings/2016/04_13_2016/20160413_SeparatelyBoundDocument5.2/D2016SIP_GBUAPCD_20160211.pdf

or impede the use of native wildlife nursery sites?				
e. Conflict with local ordinances protecting biological resources, such as tree preservation policy or ordinance?			X	
f. Conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			X	

a–f. Less than Significant Impact. The 2019-2027 City of Bishop Housing Element Update is a policy document. Implementation of the housing program set forth in the Housing Element would ultimately require a number of actions (including changed land use designations, revisions to the Municipal Code, permits and approvals) to accommodate the City’s RHNA goals and actions. However, while the current Housing Element update establishes policies and goals and actions, it does not approve any land use changes. Further, the Bishop City boundaries circumscribe a compact land area with little remaining vacant land.

Most of the future residential projects completed to meet the City’s RHNA are located on infill sites in developed areas, or on non-vacant surplus lands. Most of the potential development properties are infill sites with limited native vegetation and limited potential for sensitive biological resources. Nonetheless, some future project proposals may have potential to impact important biological resources, and these potential impacts would be assessed in conformance with applicable CEQA requirements at the time the individual projects are proposed. Mitigation measures would be adopted if required to reduce potentially significant impacts to less than significant levels. Based on the above considerations, it has been determined that the Housing Element Update would result in a less than significant impact to biological resources.

XIII-5. CULTURAL RESOURCES. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Cause a substantial adverse change in the significance of an historical resource pursuant to §15064.5?			X	
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?			X	
c. Disturb human remains, including those interred outside of formal cemeteries?			X	

a–c. Less than Significant Impact. The City of Bishop has a long and rich cultural heritage. The City of Bishop Conservation/Open Space Element indicates that human occupation in the project region is thought to date back to 1000 AD, and the Bishop area is known to have been one of the principal Paiute settlements in the area. As a result of this history, the entire planning area is considered to be sensitive for archaeological, paleontological and historic resources. The prevalence of sensitive cultural resources indicates that any land development, including that needed to achieve Housing Element goals, has the potential for significant adverse effects. In addition to CEQA mandates, the City’s General Plan contains site specific guidelines for preservation and recordation of cultural resources in tandem with the processing and review of all development proposals submitted to the City.

The 2019-2027 Housing Element Update is a policy document. It does not confer any land use approvals, nor does it compel the City to approve any specific future entitlements or land use modifications. The potential impacts on cultural resources of adopting this update are therefore determined to be less than significant. Future site-specific project proposals would be subject to applicable CEQA requirements, including the requirement to analyze impacts on historical and archaeological resources and human remains. CEQA requires that potential impacts be reduced to less than significant levels through implementation of feasible mitigation measures. Projects would also be required to comply with General Plan requirements for preservation and recordation of cultural resources. The above considerations indicate that Housing Element Update approval would not in itself result in significant impacts to cultural resources, and no further analysis is required at this time.

XIII-6. ENERGY. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
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a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

a-b. Less than Significant Impact. The Housing Element Update is a policy document that describes specific programs and actions for meeting the City’s RHNA. Each of the individual actions discussed in the Housing Element Update would be subject to further review, including CEQA compliance, when formally proposed. As a result, and although energy resources would be consumed during construction of future development associated with the RHNA, adoption of the Housing Element update would not in itself have potential to result in inefficient energy consumption or to conflict with energy plans.

The potential impacts on energy resources of specific future residential projects would be assessed at the time the projects are proposed. Mitigation measures would be adopted as required, in conformance with CEQA. The Housing Element Update would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, nor would it conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Based on the above, the Housing Element Update would result in less than significant impacts to energy resources.

XIII-7. GEOLOGY AND SOILS. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map or other substantial evidence of a known fault? ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides? 			X	
b. Result in substantial soil erosion or the loss of topsoil?			X	
c. Be located on a geologic unit or soil that is or would become unstable as a result of the project and potentially result in landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d. Be located on expansive soil per the Uniform Building Code (UBC) creating substantial risks to life or property?			X	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater systems where sewers are not available for the disposal of wastewater?				X
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

a-d and f. Less than Significant Impact. The City of Bishop is located at the north end of the Owens Valley, between the Sierra Nevada and the White Mountains of Nevada. Owens Valley is a seismically active region of eastern California. The Bishop area topography is generally flat, sloping gently to the east. The Dept. of Conservation ('DOC') ESRI Mapping Service shows four Earthquake Zones of Required Investigation that extend inside the Bishop City limits. As shown in Exhibit 2, these include two zones on the south end of the City, one zone extending from southwest of the Bishop Airport to Line Street, and one zone extending north of Wye Road along US Highway 6.⁵

⁵ California Dept. of Conservation, Earthquake Zones of Required Investigation: <https://maps.conservation.ca.gov/>

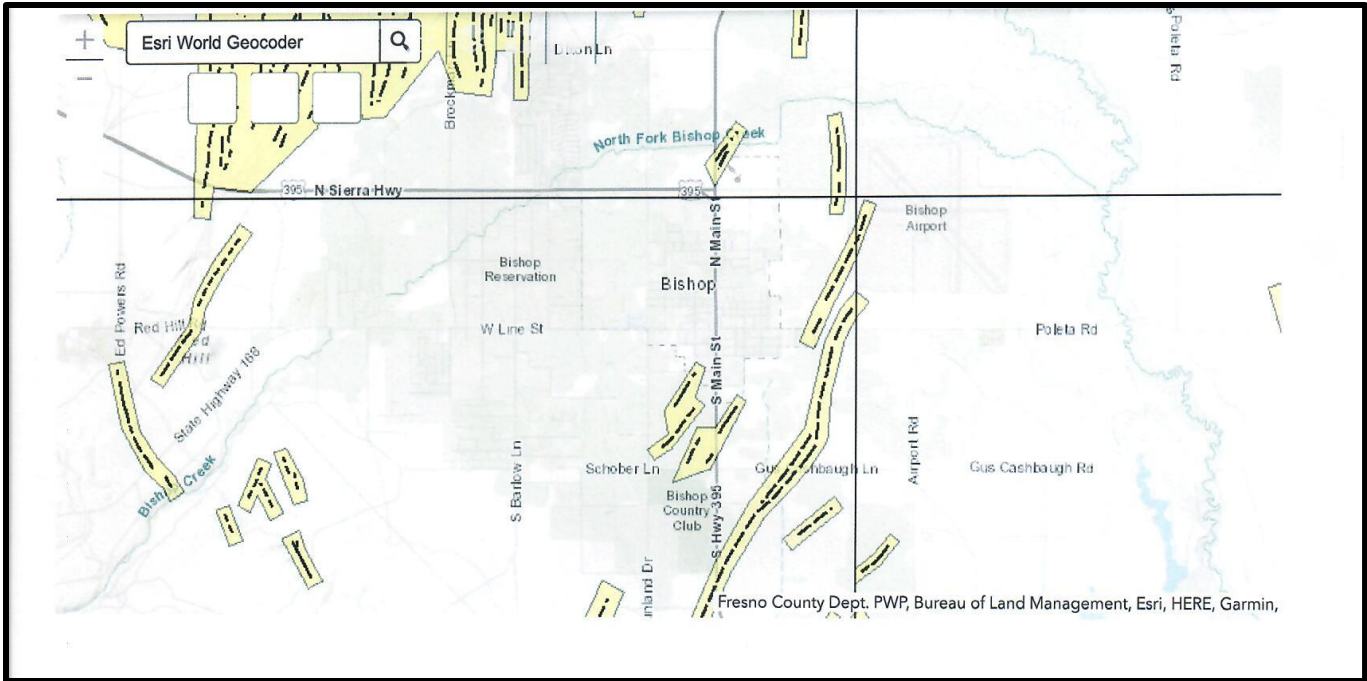


EXHIBIT 2. Earthquake Zones of Required Investigation

All future development within the housing sites would be conducted in accordance with the City’s grading guidelines, and the current California Building Codes. Where required (including the earthquake zones of Required Investigation, identified in Exhibit 2, projects would also be subject to the specifications outlined in project-specific Geotechnical Investigations. There is no indication of liquefaction or landslide risk on the DOC maps. The mapping does not provide paleontological mapping, and there is little documentation of paleontological resources in the Owens Valley generally. A 1964 report by the U.S. Geological Survey noted that most scientists, relying on what little paleontological evidence is at hand, assign the structural and physiographic features of the Sierra Nevada in Owens Valley to recent uplift dating near the close of Tertiary time.⁶

All areas within the City of Bishop corporation boundary are connected to the City’s sanitation system. Future projects within the City limits would also be served by the City’s sanitation system.

The proposed Housing Element Update is a policy level document. Project level reviews and CEQA assessments will be provided as individual projects are proposed for implementation, and mitigation will be proposed if needed to reduce potentially significant impacts to less than significant levels.

e. No Impact. The City of Bishop provides a centralized sanitation system (collection and treatment) for properties located in the City limits.

XIII-8. GREENHOUSE GAS EMISSIONS. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Generate greenhouse gas emissions that may have a significant impact on the environment?			X	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gas (GHG) emissions?			X	

a-b. Less than Significant Impact. The U.S. Environmental Protection Agency (EPA) has determined that fossil fuel combustion is the country's major source of anthropogenic (i.e., human-caused) GHG. Greenhouse gases, such as carbon dioxide, methane, nitrous oxide, and certain synthetic chemicals, trap some of the Earth's outgoing energy, thus retaining

⁶USGS and California Division of Mines, Structural Geology and Volcanism of Owens Valley Region, California-A Geophysical Study, 1964: <https://pubs.usgs.gov/pp/0438/report.pdf>

heat in the atmosphere. This heat trapping causes changes in the balance between energy received from the sun, and energy emitted into the atmosphere from Earth. These changes alter climate and weather patterns at global and regional scales.⁷

In California, the Air Resources Board ('ARB' or 'CARB') collects GHG annual emissions data for transportation, electricity, commercial/residential, industrial, agricultural, and waste management sectors, and summarizes major trends and changes to assess progress in meeting GHG reduction goals. The 2019 edition of the GHG emissions inventory found that the transportation sector is responsible for fully 41% of total GHGs, underscoring the importance of coupling housing development with job growth. Exhibit 3 shows trends in California GHG emissions, population and GDP between 2000-2018.⁸

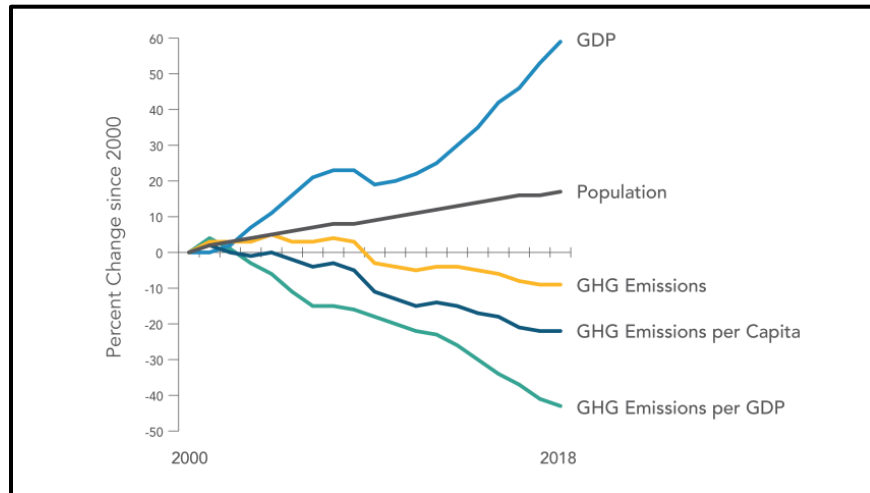


EXHIBIT 3. GHG Emission Trends in California 2000-2018

The 2019-2027 Housing Element Update is a policy document that recommends a series of actions to achieve the City's share of RHNA. It is anticipated that Housing Element Update approval will be followed by individual project proposals to implement the recommended actions. However, none of the recommendations can be implemented without project level-review, including CEQA assessments as required. The potential impacts related to GHG emissions and global warming for any specific future residential projects would be assessed at the time that individual projects are actually proposed.

XIII-9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Create a hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?			X	
b. Create a hazard to the environment or to the public through reasonably foreseeable upset & accident conditions involving a hazardous materials release?			X	
c. Cause hazardous emissions or require handling of hazardous materials, substances, or waste within ¼ mile of a school?			X	
d. Be located on a site that is on a list of hazardous materials sites compiled pursuant to CGC §65962.5 and thereby create a hazard to the public or the environment?				X
e. For a project located in an airport land use plan or (if no plan has been adopted) within 2 miles of a public airport, would the project create a safety hazard or excessive noise for people in the area?			X	
f. Impair implementation of or physically interfere with an adopted emergency response or evacuation plan?			X	
g. Expose people or structures to a significant risk of loss, injury or death involving wildland fires?			X	

⁷ EPA, Report on the Environment-Greenhouse Gases, 2020: <https://www.epa.gov/report-environment/greenhouse-gases>

⁸ CARB, GHG Emission Inventory Graphs, 2021: <https://ww2.arb.ca.gov/ghg-inventory-graphs>

a-c. Less than Significant Impact. Bishop is located on two major truck routes (US 395 and US 6) that are identified by Caltrans as part of the national truck transportation network⁹ and accommodate trucks that transport hazardous materials through central Bishop (and within ¼ mile of the Bishop Union High School). The City and Caltrans have periodically considered alternate truck routes, but there are no plans at this time. The Housing Element update includes actions that could increase the density of land uses along the Main Street truck corridor, and potentially increase hazards associated with accident and upset conditions, but potential for these impacts would be analyzed at a project-level if and when the individual actions are formally proposed for implementation. As a policy-level document, the Housing Element update would not in itself have potential to impact hazardous materials.

d. (Hazardous Site) No Impact. A search of the California Department of Toxic Substances Control (DTSC)¹⁰ Hazardous Waste and Substances Site List ('Cortese List') indicates that there are no Class I hazardous waste disposal sites in the area. The California Office of Environmental Health Hazard Assessment (OEHHA) Hazardous Waste Map identifies two permitted waste generators in the area, including LADWP (EPA ID #CAD983613159), and Southern California Edison-Bishop Service Center (EPA ID #CAR000196006).¹¹

None of the land uses proposed in the 2014 Housing Element Update is associated with transport, use or disposal of hazardous materials, or unusual fire hazard, or potential disruption to emergency response procedures or plans, and implementation of the proposed goals and objectives would not be expected to result in any hazards to the public. Approval and implementation of the Housing Element Update would not be significant with respect to hazards and hazardous materials.

e-f. Less than Significant Impact. Commercial service to Bishop Airport is expected to begin in the foreseeable future. As of early 2021, Inyo County is preparing two environmental assessments to analyze the potential impacts of commercial air service, and the Inyo County Airport Land Use Commission in December 1991 adopted a "Policy Plan and Airport Comprehensive Land Use Plan." In May 2019, FAA approved an updated Airport Layout Plan that shows future improvements to the airfield.¹² The airport is entirely located outside of the Bishop City Limits, and separated by ½ mile or more from areas discussed in the Housing Element, at a planning level of review, for future RHNA goals and actions. Approval and implementation of the Housing Element Update would be less than significant with respect to Bishop Airport.

A Community Wildfire Protection Plan (CWPP) was prepared for areas throughout Inyo County in April 2009.¹³ The report rated lands in the City of Bishop as having an overall moderate level of wildfire hazard risk. The report noted that some areas (especially on the north and west sides of Bishop) have moderate to heavy fuel loads, and recommended parcel-level analyses to identify areas with higher wildland fire risk.

As a policy level document, the Housing Element Update would not directly or indirectly expose people or structures to a significant risk of loss, injury or death involving wildland fires. Potential impacts at a project level would be assessed at the time projects are proposed for implementation, with CEQA documentation and mitigation requirements, if and necessary.

XIII-10. HYDROLOGY AND WATER QUALITY. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Violate water quality standards or waste discharge requirements, or substantially degrade surface or ground water quality?			X	
b. Decrease groundwater supplies or interfere with groundwater recharge so as to impede groundwater basin management?			X	
c. Substantially alter the drainage pattern of a site or area, (including alteration of a stream or river course), or create				

⁹ Caltrans, Truck Networks on California State Highways, District 9, August 7, 2018:

<https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/trucks/truckmap-dog-a11y.pdf>

¹⁰ DTSC, https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29

¹¹ California Office of Environmental Health Hazard Assessment Map: <https://oehha.ca.gov/calenviroscreen/indicator/hazardous-waste-generators-and-facilities>

¹² Inyo County Local Transportation Commission, June 2020: <http://www.inyoltc.org/agendas/o62oAP.pdf>

¹³ Inyo County, Community Wildfire Protection Plan, Anchor Point Group, April 2009: <https://www.wildfirelessons.net/HigherLogic/System/DownloadDocumentFile.ashx?DocumentFileKey=ae893393-a385-4996-aa52-8111eedbb89c>

impervious surfaces in a manner that would: i. result in substantial erosion or siltation on- or off-site; ii. substantially increase the rate or amount of runoff in a manner which would result in flooding on or off-site; iii. generate runoff in excess of storm drain capacity, or create added sources of polluted runoff; iv. impede or redirect flood flows?			X	
d. Increase risk of flood, tsunami, seiche, or pollutant release due to project flooding?			X	
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

a-c. Less than Significant Impact. Water supply in the City of Bishop (and some lands outside of the City limits) is provided by the City's water system. All supplies are pumped from groundwater, and customers pay a flat rate. Water quality is excellent. Although some areas of the City have deteriorated and undersized water pipes, most of the system is in good condition. The system is automated, and per capita usage rate are high.¹⁴ All projects would be served by the City's water system. Based on the City's water practices and procedures, and based on existing conditions, it is not anticipated that future projects would adversely impact water quality or water supply. However, impacts would be assessed at a project-level of review as individual projects are proposed, including CEQA compliance.

The City indicates that significant drainage and storm water quality improvements are needed in many areas, and the need for storm drain improvements may impact future Housing Element projects. These potential impacts would be subject to project-level assessment when individual projects are proposed for implementation, including mitigation measures if required to reduce potential for erosion, runoff and/or exceedance of storm drain capacity to less than significant levels.

The Housing Element Update is a policy document. Although implementation of the proposed goals and actions would ultimately require changes in land use to accommodate the RHNA, none of the changes can be approved with the current action.

d-e. Less than Significant Impact. Flood Risk: Portions of Bishop are designated by FEMA as Special Flood Hazard Areas, as shown in Exhibit 4, with additional lands designated with a 100-year flood zone.¹⁵ The Bishop *Safety Element* notes that each of the forks of Bishop Creek have channel capacities of approximately 350 cfs, with an additional 250 cfs capacity in a partial bypass, for a total capacity of about 1,000 cfs. However, channel capacities can be reduced by debris and non-uniform capacities in the bypass. The most significant flood problems are localized to low-lying areas along the Bishop Creek forks; potential loss of residential access is identified as a risk factor for some areas of the City.¹⁶ Future housing proposals resulting from the Housing Element Update would require project-level review for potential flood risk, and mitigation measures would be imposed, if required to reduce risks to less than significant levels. The City is not subject to risks from tsunami or seiche.

¹⁴ City of Bishop, Public Works Department: https://www.cityofbishop.com/departments/public_works/water.php#:~:text=Water%20quality%20and%20taste%20is,water%20system%20have%20been%20automated.

¹⁵ FEMA: <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8boadb51996444d4879338b529aa9cd&extent=-118.43689205322258,37.34974553095049,-118.35380794677735,37.3838532051076>

¹⁶ City of Bishop Safety Element: <https://www.cityofbishop.com/Document%20Center/Department/Planning/General%20Plan/Safety.pdf>.

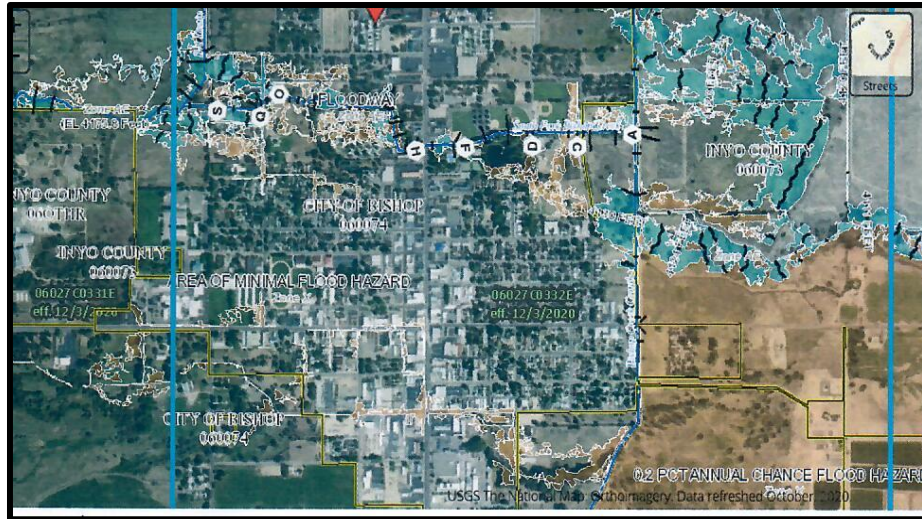


EXHIBIT 4. FEMA Special Flood Hazard Areas in Bishop

Water Quality Plan: EPA in 2013 announced a new collaborative framework for implementing the Clean Water Act §303(d) program. Known as the Long-Term Vision for Assessment, Restoration and Protection Program ('the Vision'), it provides a watershed-wide plan to improve water quality in a flexible framework. In 2015, Bishop Creek was identified as one of 2 'Vision Watersheds,' to be addressed by 2022 through the Vision Program. In particular, the middle and lower reaches of the Creek are impacted by fecal bacteria (see Exhibit 5). The LRWQCB is currently developing a regulatory action plan to address the fecal bacteria impairment to the waters of Bishop Creek, and guide restoration and protection efforts in the Bishop watershed. The Plan will include collaboration and partnerships with stakeholders and local landowners an integral element.¹⁷

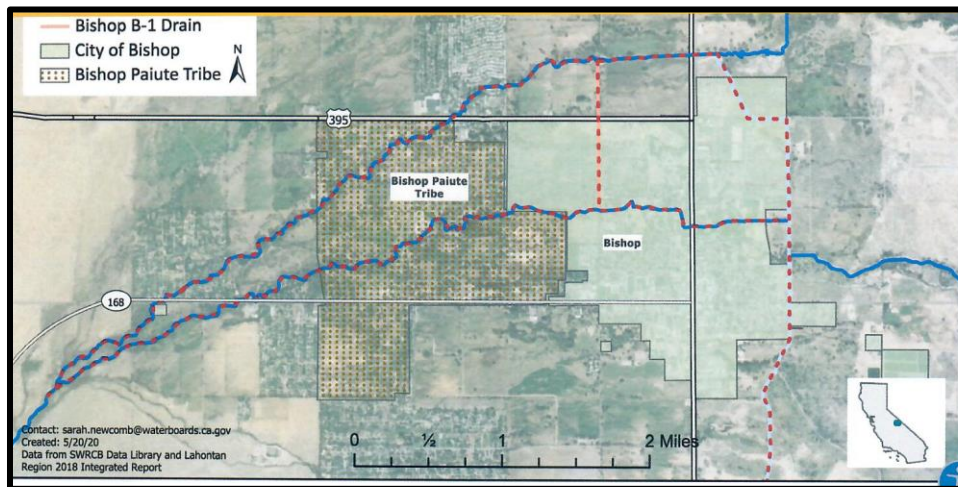


EXHIBIT 5. Bishop Creek Areas impacted by Bacteria

As with flood risk, future housing proposals arising from the Housing Element Update would require project-level review to determine whether they are subject to provisions of the forthcoming Action Plan. Mitigation measures may be imposed, if required to address fecal coliform bacteria as part of Plan implementation. However, the current Housing Element Update is a policy document that would not in itself impact the Vision Plan program, and impacts are thus less than significant.

XIII-11. LAND USE AND PLANNING. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
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¹⁷LRWQCB, Bishop Ck. Indicator Bacteria Vision Project, 2921: https://www.waterboards.ca.gov/lahontan/water_issues/programs/tmdl/bishopcreek.html

a. Physically divide an established community?				X
b. Cause conflict with any land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect?				X

a. No Impact. The City of Bishop General Plan *Land Use Element* identifies land use and planning issues, opportunities and constraints. Primary issues include (a) determining how the city can balance residential, commercial and industrial land uses to assure a stable economy; (b) collaborating with LADWP for the release of surplus lands that can be used for residential, commercial and industrial development; (c) balancing the ratio of residential and business land uses; and (d) weighing increased density against changed land use designations in order to stimulate growth.

Primary land use opportunities include: (a) availability of 400 acres of undeveloped land to meet future needs; (b) the City’s location in a beautiful region; and (c) infrastructure and public facilities that can be expanded to meet future demands. Primary constraints include: (a) the majority of vacant land is owned by LADWP, and generally unavailable; (b) increased congestion on US 395 will impact the City’s circulation system; and (c) limited potential for residential growth will constrain commercial, business and industrial development as well as the labor force.¹⁸

The identified issues, opportunities and constraints will shape implementation of the goals and actions recommended in the 2019-2027 Housing Element. However, the Housing Element Update is a policy document. It outlines a wide range of specific goals and actions that can be taken to meet the City’s share of RHNA, but does not compel the City to approve any specific project or activity. As such, the Housing Element in itself will have no direct impacts on population or housing. However, some of the future project proposals resulting from the current Housing Element Update may have the potential to impact community cohesion, or conflict with existing adopted plans and policies. Project-level proposals resulting from the Housing Element Update would be subject to individual review and CEQA compliance requirements when proposed for implementation. Such project-level reviews would include assessment of compliance with applicable planning requirements, and conformance to adopted General Plan land use and zoning standards and designations. Further, CEQA requires that potential impacts be reduced to less than significant levels through implementation of feasible mitigation measures.

XIII-12. MINERAL RESOURCES. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state?			X	
b. Result in loss of a locally important mineral resource recovery site per a general plan, specific plan or other land use plan?			X	

a-b. Less than Significant Impact. The DOC State Geologist provides mineral land classification studies under the 1975 Surface Mining and Reclamation Action (“SMARA”). The two-phase process includes resource classification (a responsibility of the State Mining and Geology Board), and the mapped resource designations (as provided in the mapping). The Mineral Land Classification mapping for the Bishop area, shown in Exhibit 6, indicates that a large mineral resource study area (the grey-shaded area) has been designated about 10 miles east of Bishop (and continuing to the Nevada border), but indicates that there are no designated mineral resources in the City of Bishop.¹⁹

¹⁸City of Bishop: https://www.cityofbishop.com/departments/planning/general_plan.php

¹⁹ California Dept. of Conservation: <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>

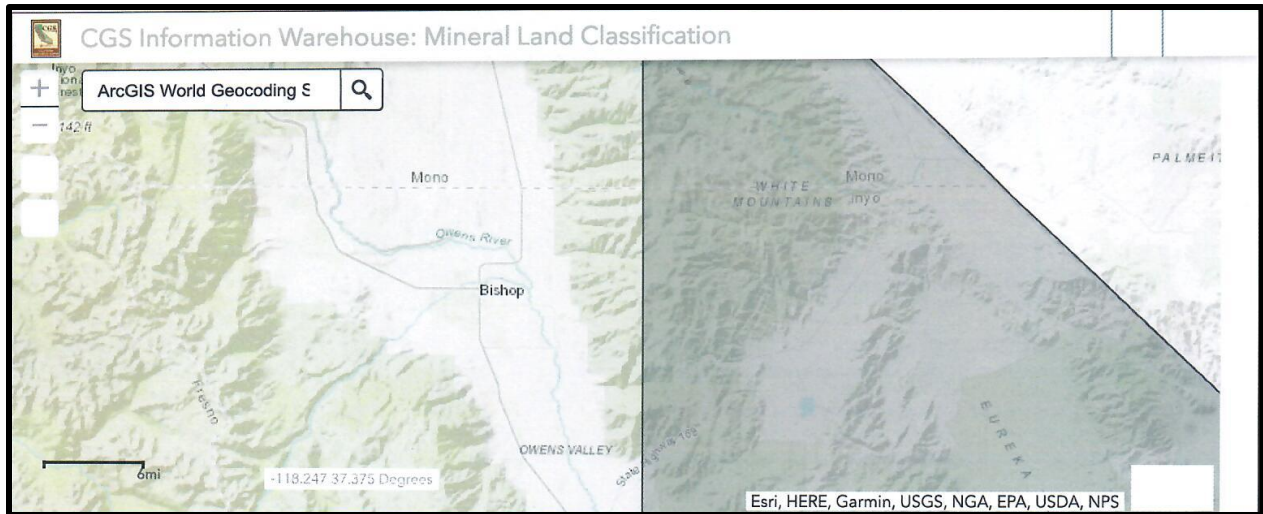


EXHIBIT 6. Mineral Land Classification Map for the Bishop Area

The Housing Element Update is a policy document that describes specific programs and actions for meeting the City’s RHNA; as such, it does not have potential for any direct impacts on mineral resources. The potential impacts associated with specific future residential projects would be assessed at the time the projects are proposed. Mitigation measures would be adopted if and as required, in conformance with CEQA.

XIII-13. NOISE. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Cause a temporary or permanent increase in ambient noise levels in the project area in excess of standards established in the general plan or noise ordinance, or standards of other agencies?			X	
b. Generation of excessive ground borne vibration or ground borne noise levels?			X	
c. For a project located in the vicinity of a private airstrip or airport land use plan, or within 2 miles of a public or public use airport, would the project expose people to excessive noise?			X	

a-c. Less than significant impact. The City of Bishop *Noise Element* notes that primary noise sources (traffic along US 395, flights in and out of Bishop Airport, and several small industrial developments). The Noise Element also identifies three noise issues, three noise-related opportunities and four constraints.

The issues include (a) questions regarding potential for the Bishop Airport to impact development potential in the northeast part of the City; (b) the need to maintain acceptable noise levels as noise-generating activities increase; and (c) identification of planning programs to address future airport, industrial and transportation noise impacts. The opportunities include: (a) a relatively low ambient noise level; (b) confinement of higher noise levels to certain areas, particularly along US and the light industrial area in northeast Bishop; and (c) the Airport’s location away from the City’s urban core. The constraints include: (a) noise from long-term increased use of US 395, US 6, and SR 168; (b) increased use of Bishop Airport; (c) the fact that Bishop does not control Bishop Airport; and (d) the potential for population growth and associated increased noise levels.²⁰

As a policy document, the 2019-2027 Housing Element Update would not in itself have potential to directly impact noise levels. However, the Housing Element Update recommends a wide range of actions (to achieve the City’s share of RHNA) that could result in direct and indirect impacts to noise levels. Following Housing Element Update approval, it is anticipated that individual project proposals will be submitted to implement the recommended actions. The City reviews noise impacts as part of the CEQA compliance process, supported by General Plan policies. Future proposals would be subject to individual review in accordance with these practices, including CEQA assessments as required. The potential impacts related to ambient noise

²⁰ City of Bishop: https://www.cityofbishop.com/departments/planning/general_plan.php

levels, vibrational noise and airport noise would be studied at the project level, and mitigation measures would be proposed to reduce potentially significant impacts to less than significant levels, in conformance with CEQA. These requirements would apply to individual actions recommended in the Housing Element at the time they are proposed; approval of the Housing Element Update would not in itself have a significant impact with respect to noise impacts nor would it commit the City to actions that would have significant noise impacts.

XIII-14. POPULATION AND HOUSING. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Induce unplanned population growth in an area, either directly (e.g. by proposing new homes and businesses) or indirectly (e.g., extension of roads or other infrastructure)?			X	
b. Displace existing people or housing, necessitating the construction of replacement housing elsewhere?			X	

a-b. Less than significant impact. As discussed above under XIII-11 (Land Use), many of the City’s issues, constraints and opportunities center on the lack of available land and avenues to ensure adequate housing and employment opportunities for residents into the future. These issues and challenges also apply to the 2019-2027 Housing Element Update, and many of the recommended Housing Element goals and actions are specifically designed to address the identified constraints. Implementation of future projects to fulfill the goals and actions recommended in the Housing Element will clearly have potential to impact housing and population in Bishop, with a wide range of associated potential environmental impacts. However, no specific projects or activities are proposed at this time, and the goals and actions recommended in the Housing Element do not have potential in themselves to impact population, housing or other environmental resources.

As specific project-level proposals are formulated, each will be subject to individual review and CEQA compliance requirements. Such project-level reviews would assess compliance with the City’s General Plan and Zoning standards and regulations, and would also provide mitigation measures if and as needed to reduce potentially significant impacts to less than significant levels.

XIII-15. PUBLIC SERVICES. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Result in adverse impacts associated with provision of or need for new or 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:			X	
i. Fire protection?			X	
ii. Police protection?			X	
iii. Schools?			X	
iv. Parks?				X
iv. Other public facilities?			X	

a(i-iv). Less than significant impact. Fire: The Bishop Rural Fire Protection District and the City of Bishop jointly provide fire protection and other emergency services in the City and larger Bishop area. The Department is staffed by 39 volunteers, with one full time (Fire Chief) and one part-time (Assistant Chief) paid position. Police: The Bishop Police Department employs 12 fully sworn Police Officers, and 18 additional staff positions (2 level I Reserve Officers, 3 level II Reserve Officers, 1 civilian Support Services Manager, 5 dispatchers, 1 Evidence Tech/PIO, 5 crossing guards, and 1 front office clerk). Schools: Residents attend one of the three public schools (Bishop Elementary, Home Street Middle School, and Bishop High School). The Bishop Unified School District also operates the Palisade Glacier High School in Big Pine. Parks: The 44-acre Bishop City Park is located in downtown Bishop and provides a pool, tennis, baseball, dog exercise area, fitness and other facilities. Additionally, the Community Services Dept. offers over 65 programs through the year for residents of all ages and abilities. Other public facilities: Additional public facilities include community college, public health, and fair ground services.

Bishop residents are served by the fire protection, police protection, educational and recreational services described above. Most of the City services operate under defined service ratios and other performance objectives, and most would be impacted by population growth. As a result, successful implementation of the recommended Housing Element goals and actions would have potential to impact governmental facilities. However, as a policy-level document, the Housing Element does not have potential to directly impact public services. Impacts would occur in conjunction with specific development projects, all of which would be subject to individual review, including planning and CEQA assessments as required. The potential impacts related to public services would be studied at the project level, and feasible mitigation measures would be imposed to reduce potentially significant impacts to less than significant levels, in conformance with CEQA.

a(iv). No impact. As discussed below in XIII-16, the City of Bishop provides ample municipal parkland for use by residents, and the City is surrounded on all sides by extensive and high quality public recreation areas.

XIII-16. RECREATION. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration would occur or be accelerated?				X
b. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?				X

a-b. No impact. The American Planning Association (APA) recommends a standard of one acre of parkland for every 100 residents.²¹ In the City of Bishop, with about 3,766 residents, the APA standard would call for about 37 acres of parkland. The 44-acre Bishop City Park alone exceeds this standard, providing about 1 acre of parkland per 80 residents. Moreover, Bishop is surrounded by publicly owned lands, and within easy driving distance of a wide range of world-class outdoor destinations.

The Housing Element is a policy document with no potential in itself to impact existing recreation facilities or create a need for new facilities. However, future proposals to meet housing needs may, if approved and implemented, impact the use of local and regional recreational facilities. The potential for such impacts would be studied at the time that individual projects are actually proposed and, if required to reduce potentially significant effects, mitigation measures would be adopted in conformance with CEQA.

XIII-17. TRANSPORTATION. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Conflict with a program plan, ordinance, or policy addressing circulation including transit, roadway, bicycle and pedestrian facilities?			X	
b. Conflict with CEQA Guidelines §15064.3(b)?			X	
c. Increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d. Result in inadequate emergency access?			X	

a-d. Less than Significant Impact. The 2012 City of Bishop Mobility Element defines how the City will meet the transportation and circulation needs of residents, businesses, and visitors while protecting its resources. Chief among the Mobility Element goals and policies are the following: (a) Coordinate transportation systems with planned land uses, (b) Promote the safe and efficient transport of goods and the safe and effective movement of all populations, (c) Make efficient use of existing transportation facilities, and (d) Protect environmental quality and promote the wise and equitable use of

²¹ American Planning Association, Planning Advisory Services, Standards for Outdoor Recreational Areas, 1964: <https://www.planning.org/pas/reports/report194.htm>

economic and natural resources. The Mobility Element also emphasizes multi-modal transportation, including long-term goals to accommodate pedestrian movement and bicycles.²²

Because the Housing Element update is a policy document, it does not have potential to impact the City’s transportation facilities or priorities. However, it does recommend actions that would (if proposed, approved and implemented) have the potential to impact mobility features. Project-level proposals resulting from the Housing Element Update would be subject to individual review and CEQA compliance requirements at the time they are proposed for implementation. Such project-level reviews would include assessment of compliance with applicable planning requirements, including adopted mobility standards and underlying mobility goals and policies. In accordance with CEQA, potential impacts would be subject to mitigation measures to reduce potential effects to less than significant levels.

XIII-18. TRIBAL CULTURAL RESOURCES. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Cause an adverse change in the significance of a tribal cultural resource (per PRC §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:			X	
i. Listed or eligible for listing in the California Register of Historical Resources, or a local register of historical resources per PRC §5020.1(k)?			X	
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 PRC §5024.1 (giving consideration to the significance of the resource to a California Native American tribe)?			X	

a(i-ii). Less than Significant Effect. The lands in and around Bishop are characterized by a long and rich cultural heritage, including a wide range of sites, features, and places with cultural value. As a result, projects in this region have potential to impact sites that are listed or eligible for listing in the California Register of Historical Resources (including sites listed pursuant to criteria in PRC §5024.1(c) setting forth criteria in the National Register of Historic Places criteria).²³

The Housing Element is a policy document with no potential in itself to impact tribal cultural resources. However, the update proposes goals and actions that would require changed land use designations in order to accommodate the City’s share of RHNA. However, all proposed changes to the City’s land use and zoning standards would require detailed analysis and review prior to approval. Environmental assessments would be required in accordance with the requirements of CEQA, including mitigation measures to reduce potentially significant impacts to less than significant levels. Future development proposals would also be required to follow the protocols pursuant to Assembly Bill 52 and Senate Bill 18 regarding notification and consultation with Native American Tribes.

XIII-19. UTILITIES AND SERVICE SYSTEMS. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Require relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities that could cause significant environmental effects?			X	
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			X	

²² City of Bishop: https://www.cityofbishop.com/departments/planning/general_plan.php

²³ Calif. Legislative Information: https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=5024.1

c. Result in a determination by the wastewater treatment provided which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair attainment of solid waste reduction goals?				
e. Comply with federal, state, and local management and reduction statutes and regulation related to solid waste?				

a-e. Less than significant impact. The City of Bishop is responsible for providing water services and sanitation services to its residents. Solid waste collection services are provided by Bishop Waste, a privately-owned company that is located in Bishop. Bishop Waste provides residential and commercial waste collection. Inyo County Recycling Waste Management manages the disposal sites, including a landfill in Bishop (as well as Big Pine, Independence and Lone Pine), and transfer stations in Olancha, Keeler, Homewood Canyon, Darwin and Tecopa.²⁴

Adoption of the proposed 2019-2027 Housing Element Update would not have potential to impact any utilities or exceed service capacities. However, implementation of the programs and actions recommended in the document would accommodate development required to meet the City's RHNA. In turn, the new residential development would be expected to increase the burden on existing utilities and service systems. To address potential project-level impacts on water, wastewater treatment storm water drainage, and solid waste disposal, all future proposals would be subject to individual project-level review, including planning and CEQA assessments as required, including consideration of the potential impacts to utilities and service systems. Mitigation measures would be proposed to reduce potentially significant impacts to less than significant levels, in conformance with CEQA.

XIII-20. WILDFIRE RISK. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
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?			X	
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?			X	
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?			X	

a-d. Less than Significant Impact. Emergency response services throughout Inyo County are coordinated by the Inyo County Office of Emergency Services (OES). OES alerts, notifies and coordinates all partnering agencies when emergency response is required, and ensures that resources will be adequate through preparation of emergency response plans and procedures. OES also provides preparedness materials to the public, and staffs the Operational Area Emergency Operations Center, which provides regional coordinated emergency response²⁵.

As discussed in Section XIII-g(e-f), a 2009 Community Wildfire Protection Plan rated lands in the City of Bishop as having an overall moderate level of wildfire hazard risk. The report noted that some areas (especially on the north and west sides of Bishop) have moderate to heavy fuel loads, and recommended parcel-level analyses to identify areas with higher wildland fire risk.

²⁴Inyo County Landfills and Transfer Stations: <https://www.inyocounty.us/services/solid-waste/waste-disposal/landfills-transfer-stations>

²⁵Inyo County OES: <https://www.inyocounty.us/services/emergency-services>.

As a policy document, the Housing Element Update does not have potential to impact emergency response services, expose people or structures to wildfire or related flooding and erosion, or require new infrastructure that may exacerbate wildfire risk. In the long term, implementation of the goals and actions recommended in the document may accommodate development required to meet the City's RHNA, and that development would have potential to impact wildfire risk. Future development proposals would be reviewed for consistency with fire protection development standards and hazard abatement, and would be subject to all applicable CEQA requirements. Thus, individual future projects may be required to provide weed abatement, adequate emergency vehicle access, use of non-combustible building materials, and mitigation measures if and as needed to ensure fire safety. The potential impacts related to wildland fire for any specific future residential projects would be assessed at the time the projects are actually proposed. Project design features would be included to ensure impacts related to wildfire would be less than significant.

XIII-21. MANDATORY FINDINGS OF SIGNIFICANCE. Would the project:

ISSUE	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT	NO IMPACT
a. Have the potential to substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable futures projects)?			X	
c. Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

a–c. Less Than Significant Impact. As discussed throughout this Initial Study Checklist, the Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. And while long-term implementation of the goals and actions contained in the document would accommodate development as required to meet the City's RHNA, the Housing Element Update does not identify, describe, promote, entitle, or permit any particular residential development project.

The act of adopting the updated Housing Element Update does not, therefore, have the potential to result in environmental impacts, either limited or cumulative, affecting habitat; plant or animal communities; rare, endangered or threatened species; historic resources; or human beings. Potential impacts resulting from the development of any specific future residential projects would be assessed at the time the projects are actually proposed. Mitigation measures would then be adopted as necessary, in conformance with the requirements of CEQA.