



Planning Department
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DRAFT NEGATIVE DECLARATION OF ENVIRONMENTAL IMPACT AND
INITIAL STUDY

PROJECT TITLE: General Plan Amendment (GPA) 2021-01/Housing Element Update 2021

PROJECT LOCATION: Countywide

PROJECT DESCRIPTION: The General Plan Housing Element is required pursuant to California Government Code Section 65580 et seq., and works to provide housing for all of Inyo County's residents. The State is required to identify a Regional Housing Needs Assessment (RHNA) for the County and 205 units have been allocated for unincorporated Inyo County. The Update includes this requirement, new demographic information, and other revised regulations. Policy changes proposed include the following: allowing flexibility for locating residential care facilities; incorporating monitoring very low, low and moderate housing unit development; reasonable accommodation provisions to provide a means for persons with disabilities to request exceptions to zoning and building regulations; updating the code to include Low Barrier Navigation Centers, Transitional and Supportive Housing and Emergency Shelters to meet State requirements; update County code to meet new Density Bonus requirements; work on programs to encourage Accessory Dwelling Units, consider allowing for by right multifamily in the Central Business Zone, review Affirmatively Further Fair Housing analysis; evaluate ways to provide infrastructure in remote areas; and, remove any restrictive language regarding mobile homes.

FINDINGS:

- A. The proposed project is consistent with goals and objectives of the Inyo County General Plan.
- B. The proposed project is consistent with the provisions of the Inyo County Zoning Ordinance.
- C. Potential adverse environmental impacts will not exceed thresholds of significance, either individually or cumulatively.
- D. Based upon the environmental evaluation of the proposed project, the Planning Department finds that the project does not have the potential to create a significant adverse impact on flora or fauna; natural, scenic and historic resources; the local economy; public health, safety, and welfare. This constitutes a Negative Finding for the Mandatory Findings required by Section 15065 of the CEQA Guidelines.

The 30-day public review period for this Draft Negative Declaration will expire on July 18, 2021. Inyo County is not required to respond to any comments received after this date.

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

Name

Date

INYO COUNTY PLANNING DEPARTMENT

CEQA APPENDIX G: INITIAL STUDY & ENVIRONMENTAL CHECKLIST FORM

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

9) The explanation of each issue should identify:

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



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INYO COUNTY PLANNING DEPARTMENT

APPENDIX G: CEQA INITIAL STUDY & ENVIRONMENTAL CHECKLIST FORM

1. Project title: GPA 2021-01/Housing Element
2. Lead agency name and address: Inyo County Planning Department, PO Drawer L, Independence, CA 93526
3. Contact person and phone number: Cathreen Richards: 760-878-0447
4. Project location: Countywide
5. Project sponsor's name and address: Inyo County
6. General Plan designation: N/A
7. Zoning: N/A
8. Description of project: The project consists of amending the County's General Plan - Housing Element. This includes addressing the projected housing needs of current and future residents as well as ensuring that state Housing Element law is complied with.
9. Surrounding land uses and setting: The environmental setting consists of the areas located within the unincorporated regions of Inyo County. Inyo County includes over 50 small communities and one incorporated city, Bishop. This City of Bishop as an incorporated jurisdiction, must prepare its own Housing Element. The community of Independence, located near the center of the Owens Valley, is the County seat. Highway 395 provides the primary north-south transportation link through the County with other highways providing connections to Death Valley and southeastern Inyo County.

Inyo County is the second largest county in California, with a total land area of approximately 10,140-square miles or about 6.5 million-acres. Even though the County contains this large land area, the amount of land held in private ownership is very small—1.9 percent. A range of federal agencies (91.6 percent), the State of California (3.5 percent), the Los Angeles Department of Water and Power (LADWP) (2.7 percent), and the County/other local agencies/Tribal lands (0.3 percent) make up the remaining 98.1 percent.
10. Other public agencies whose approval is required: California Department of Housing and Community Development.
11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun? Inyo County started the SB18 90-day Tribal Consultation opportunity period, according to

Government Code Section 65352.3, by sending out certified written notices on November 5, 2020 inviting the Tribes to consult on the project. The tribes that were notified are: Big Pine Tribe of Owens Valley, Bishop Paiute Tribe, Fort Independence Indian Community of Paiutes, Lone Pine Paiute-Shoshone Tribe, Timbisha Shoshone tribe, Twenty-Nine Palms Band of Mission Indians, Kern Valley Indian Community, and the Walker River Reservation. No Tribes have requested consultation on the project, per SB18.

On May 19, 2020, per Public Resource's Code 210080.3.1 the County started the AB52 Tribal Consultation opportunity by sending out certified written invitations. These were sent to: Big Pine Tribe of Owens Valley, Bishop Paiute Tribe, Fort Independence Indian Community of Paiutes, Lone Pine Paiute-Shoshone Tribe, Timbisha Shoshone tribe, Twenty-Nine Palms Band of Mission Indians, Cazaban Band of Mission Indians and the Torrez Martinez Desert Cahuilla Indians. The Bishop Paiute Tribe requested consultation. A consultation meeting was held with the Tribe and the County on May 27, 2021. County staff presented the Public Comment Draft to the Tribe. After some discussion, the Tribe said they would review during the CEQA comment period and send comments as appropriate.

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics Resources | <input type="checkbox"/> Agriculture & Forestry | <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 / Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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



Name

6-18-2021

Date

INYO COUNTY PLANNING DEPARTMENT ENVIRONMENTAL CHECKLIST FORM

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

a) Have a substantial adverse effect on a scenic vista?
No, the 2021 Housing Element Update does not include any specific designs or proposals, nor does it grant any entitlements for development. Implementation of the Housing Element Update would potentially lead to an increase in residential units within the County; however, this would not allow for development, or densities beyond that identified in the County's General Plan and any potential residential development would be required to meet the height requirements of the zoning code, which keeps residential development from affecting scenic vistas.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
No, while the Housing Element Update encourages the provision of a range of housing types and affordability levels, it does not include any specific designs or proposals, nor does it grant any entitlements for development that would degrade the existing visual character of the County. The Housing Element anticipates land uses that are consistent with the land use designations and densities established by the General Plan. Future residential development projects will require compliance with the General Plan policies related to visual resources and Zoning Ordinance requirements associated with planning and development regulations.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?
 (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
No, while the Housing Element Update encourages the provision of a range of housing types and affordability levels, it does not include any specific designs or proposals, nor does it grant any entitlements for development that would degrade the existing visual character or quality of public views within the County. The Housing Element anticipates land uses that are consistent with the land use designations and densities established by the General Plan. Future residential development projects will require compliance with the General Plan policies related to visual resources and Zoning Ordinance requirements associated with planning and development regulations.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?
No, the proposed Housing Element Update is a policy-level document that does not include any specific development designs or proposals, nor does it grant any entitlements for development that would increase daytime glare or nighttime illumination in the County. Future residential development projects within the County would be required to be designed and constructed in accordance with the General Plan, zoning and Subdivision Ordinance requirements associated with planning and development regulations. These would include the General Plan Policy VIS-1.6 states that the County shall require that all outdoor light fixtures, including street lighting, externally illuminated signs, advertising displays, and billboards, use low-energy, shielded light fixtures which direct light downward (i.e., lighting shall not emit higher than a horizontal level) and which are fully shielded.

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

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No, the Housing Element Update will not affect prime, unique, or farmland of statewide importance. No potentially important farmland has been mapped in Inyo County.

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"/>
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No, Inyo County has no Williamson Act contracts.

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"/>
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No, the Housing Element Update will not affect timberland as there is none in Inyo County.

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"/>
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No, the Housing Element Update will not affect forestland.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, implementation of the Housing Element Update will not include development located on farmland and will not convert land used for agriculture to non-agriculture as the majority of agriculture land use in Inyo County is conducted on range-land owned by the Los Angeles Department of Water and Power, and various Federal Agencies, and is not appropriately zoned for high density residential use.

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

a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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No, although areas within Inyo County are sometimes in non-attainment for PM10, caused by dust generated and blown from the Owens Dry Lake, policy changes based on the Housing Element Update will not obstruct the implementation of the air quality plan addressing this. Any future construction in the County must follow the regulations set forth by the Great Basin Unified Air Pollution Control District and the County.

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"/>
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No, see III a.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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No, see III a.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the Housing Element Update is a policy document. It does not include any specific development designs or development proposals, nor does it grant any entitlements for development. Future residential development would be required to comply with General Plan policies and environmental health regulations related to pollutants, during both construction and operational activities.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, residential developments are not considered to be an emission source that would result in objectionable odors.

IV. BIOLOGICAL RESOURCES: Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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No, the proposed Housing Element Update is a policy level document. While it encourages the provision of a range of housing types and affordability levels, it does not include any specific development designs or development proposals, nor does it grant any entitlements for development. All future residential development occurring within the County would be required to be in accordance with local regulations addressing special status species. These policies and implementation measures seek to maintain and enhance biological diversity and healthy ecosystems throughout the County. For example, the General Plan's Biological Resources Implementation Measure 2.0 states that project sites that have the potential to contain species of local or regional concern, sensitive natural communities, or special-status species shall be required to have the site surveyed and mapped by a qualified biologist and a report on the findings of the survey shall be submitted to the County as part of the application and environmental review process. Also, the sites identified to satisfy the Regional Housing Need Allocation (RHNA) are infill in nature as they are located within or surrounded by already developed communities/neighborhoods.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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No, as discussed under a) above, the proposed Housing Element Update is a policy-level document and it does not include any site-specific designs or development proposals, nor does it grant any entitlements for development. The potential for the proposed Housing Element to impede native resident or migratory wildlife corridors or the uses of wildlife nursery sites cannot be determined, as no specific details regarding future land use development are provided. Although additional impacts are not expected to result from the implementation of future individual residential projects within the areas of the County affected by the Housing Element's proposed regulatory changes, as well as, from potential development of the sites identified to satisfy the RHNA, a review would be required of these future proposals and would identify and if necessary require avoidance or provide mitigation for any impacts to native wildlife corridors and nursery sites.

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No, as discussed under a and b) above, the proposed Housing Element Update is a policy-level document and it does not include any site-specific designs or development proposals, nor does it grant any entitlements for development. The potential for the proposed Housing Element to have an adverse effect on wetlands cannot be determined, as no specific details regarding future land use development are provided. Although additional impacts are not expected to result from the implementation of future individual residential projects as they relate to the sites identified to satisfy the RHNA or by the Housing Element's proposed regulatory changes, review would be required of these future proposals and would identify and if necessary require avoidance or provide mitigation for any impacts to wetlands in the County.

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

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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No, as discussed above, the proposed Housing Element Update is a policy-level document and it does not include any site-specific designs or development proposals, nor does it grant any entitlements for development. The potential for the proposed changes to the Housing Element to interfere substantially with the movement of native resident or migratory fish or wildlife species or migratory wildlife corridors or the uses of wildlife nursery sites cannot be determined, as no specific details regarding future land use development are provided. Although additional impacts are not expected to result from the implementation of future individual residential projects as they relate to the sites identified to satisfy the RHNA or by the Housing Element's proposed regulatory changes, review would be required of these future proposals and would identify, and if necessary, require avoidance or provide mitigation for any impacts to native wildlife corridors and nursery sites.

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

No, the proposed Housing Element Update does not include any specific development proposals, nor does it grant any entitlements for development that would affect biological resources. Therefore, the proposed Housing Element would not conflict with any local policies or ordinances protecting biological resources. These policies and ordinances will have to be followed during any future residential development as appropriate.

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

No, the proposed Housing Element Update does not include any specific development proposals, nor does it grant any entitlements for development that would affect biological resources. Therefore, the proposed Housing Element would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Any adopted plans will have to be followed during any future residential development as appropriate.

V. CULTURAL RESOURCES: Would the project:

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

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

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

a-c) No, future residential development within the County could conflict with existing known cultural and historical resources. In addition to "known" resource areas, there is the potential that there are undiscovered paleontological and archeological resources that would be encountered and potentially impacted by future construction activities. These resources could include human remains located outside of cemeteries. While the Housing Element encourages the provision of a range of housing types and affordability levels, it does not include any specific development designs or proposals, nor does it grant any entitlements for development that would adversely affect archaeological, paleontological, or historic resources. All future residential development occurring within the County would be required to be in accordance with local regulations, including the General Plan policies. Pursuant to Section 15064.5 of the CEQA Guidelines a study conducted by a professional archaeologist may be required for projects with identified archaeological sites to determine if significant archaeological resources are potentially present and if the project will significantly impact the resources. If significant impacts are identified, the development project is required to be modified to avoid the impacts or to mitigate the impacts. Also, in the event an archaeological or cultural resource is discovered on the site during any future development, work shall immediately stop and Inyo County staff shall immediately be notified per Inyo County Code (ICC) Chapter 9.52, Disturbance of Archaeological, Paleontological and Historical Features of the Inyo County Code.

VI. ENERGY: Would the project:

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

No, the proposed Housing Element Update does not include any specific development proposals, nor does it grant any entitlements for development that would result in significant impacts due to energy consumption. Potential projects related to the Housing Element

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Update would be subject to further review, including CEQA compliance and General Plan policies regarding potential energy consumption issues for both construction and operation.

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

No, the proposed Housing Element Update does not include any specific development proposals, nor does it grant any entitlements for development that would result in conflicts or would obstruct plans for renewable energy. Also, none of the sites identified in the Housing Element Update to satisfy the RHNA are located in any of the County's Solar Energy Development Areas (SEDA), as identified by the General Plan.

VII. GEOLOGY AND SOILS: Would the project:

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

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.

No, the Housing Element Update includes policies and programs designed to facilitate the construction and conservation of housing which could increase exposure of people and structures to seismic hazards, including rupture of a fault, strong seismic shaking, and seismic-related ground failure. However, the Housing Element is a policy-level document that encourages the provision of a range of housing types and affordability levels rather than identifying any specific designs or development proposals. Also, none of the future sites identified to satisfy the RHNA are located within an Alquist-Priolo zone. All future residential development would be required to be in compliance with local and state regulations, including the General Plan, Zoning Ordinance and the Alquist-Priolo Earthquake Fault Zoning Act. Environmental impacts of subsequent development projects would also be considered pursuant to CEQA on a case-by-case basis following submittal of a specific development proposal. Applicants would also have to work with the Inyo County Department of Building and Safety to implement the proper structural specifications.

ii) Strong seismic ground shaking?

No, the California Building Code ensures that structures be built according to required seismic standards designed to withstand such events and this would apply to any projects related to the Housing Element Update.

iii) Seismic-related ground failure, including liquefaction?

No, the California Building Code ensures that structures be built according to required seismic standards. Also, as part of Inyo County Building and Safety Code, any future building sites related to the Housing Element Update will be assessed and a determination will be made if a soils report is necessary to avoid ground failure impacts to the built structures.

iv) Landslides?

No, Landslides are most likely on hillsides where rock strata parallels surface slopes, high clay content absorbs excess water, displacement has fractured a fault zone, or the base of a slope has been removed by erosion or people. The steep mountain ranges in Inyo County, combined with extreme and rapidly changing weather conditions, can contribute to severe snow avalanche danger in portions of the County. Public Safety Element Policy GEO-1.5 restricts development on steep slopes (defined as slopes greater than 30 percent). Policy AVL-1.1 discourages new development in areas of known or potential avalanche hazard and Policy AVL-1.4 requires structural protections for new buildings in an avalanche hazard zone or area otherwise identified as being at risk of avalanche damage. Also, none of the sites identified to satisfy the RHNA are located in areas prone to landslides.

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

No, future construction related to the Housing Element Update could result in the moving and grading of topsoil, which could lead to disturbed soils that are more likely to suffer from erosion from a variety of sources, such as wind and water. The proposed Housing Element is a policy-level document that does not propose any specific development and does not directly result in adverse impacts associated with substantial loss of topsoil or erosion. Any future residential developments would be subject to Building and Safety codes that address grading.

c) Be located on a geologic unit or soil that is unstable,

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

No, all future residential development occurring within the County would be required to be in accordance with all local regulations, including Conservation/Open Space Element Policy S-2.3, which states that in areas of unstable soils and/or steep terrain, the County shall limit the intensity of development in order to minimize the potential for landform instability. Public Safety Element Policy GEO-1.5 restricts development on steep slopes (defined as slopes greater than 30 percent), and Policy GEO-1.4 requires that new development of habitable structures that are located within potential seismic hazard zones provide appropriate engineering design strategies to comply with appropriate building standards. Also, none of the sites identified to satisfy the RHNA are located in areas of unstable soils and/or steep terrain or Alquist-Priolo earthquake zones.

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

No, although future residential development on expansive soils could create substantial risks to life or property and result in adverse impacts such as on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse, the proposed Housing Element Update is a policy-level document that does not propose any specific development. All future residential development is subject to evaluations of the soil during the development of the property and if issues arise the applicant/developer would work with Inyo County's Building and Safety Department to employ the proper design standards to comply with appropriate building standards.

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

No, all future residential development requires connection to, or development of, wastewater disposal systems acceptable to the Inyo County Environmental Health Services Department. These requirements may be satisfied by the development of an individual septic system if approved by the Inyo County Environmental Health Services Department. Also, the sites identified in the Update to satisfy the RHNA are either in or adjacent to sewer districts or are on lots large enough to accommodate a septic system.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No, although future residential development within the County could conflict with existing known paleontological resources and potentially be impacted by future construction activities, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development that would adversely affect paleontological, or unique geological features. All future residential development occurring within the County would be required to be in accordance with local regulations, including the General Plan policies. If significant impacts are identified, any development project is required to be modified to avoid the impacts or to mitigate the impacts. Also, in the event a paleontological resource is discovered on the site during any future development, work shall immediately stop and Inyo County staff shall immediately be notified per Inyo County Code (ICC) Chapter 9.52, Disturbance of Archaeological, Paleontological and Historical Features of the Inyo County Code.

VIII. GREENHOUSE GAS EMISSIONS: Would the project:

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development that would generate greenhouse emissions. Future residential development related to the Update would be assessed for potential impacts related to greenhouse gas emissions during application review.

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

No, the proposed Housing Element Update would not cause conflicts with a plan, policy or regulation adopted for the purpose of reducing greenhouse gasses. Future residential development related to the Update would be required to follow applicable plans, policies and regulations regarding greenhouse gases.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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IX. HAZARDS AND HAZARDOUS MATERIALS: Would the project:

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Future residential development would also not include the transport, use or disposal of hazardous materials.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Future residential development would also not include the transport, use or disposal of hazardous materials.

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Future residential development would also not include the transport, use or disposal of hazardous materials.

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, the sites identified in the Housing Element Update to satisfy the RHNA are not shown on the DTSC sites map or on Geotracker and EnviroStor databases.

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, although some of the sites identified to satisfy the RHNA are within 2-miles of an airport, additional residential development will not be subject to safety hazards due to the proximity as residential development in the County is limited to 1.5-stories. Anything above this would be required to be evaluated for possible impacts due to height.

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, the sites identified to satisfy the RHNA are not located in areas where there would be interference with emergency plans.

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Risk of loss, injury, and death involving wildland fires is minimal to the sites identified to satisfy the RHNA as compliance with California Building Standards will be required of all future building. All of the sites identified to satisfy the RHNA are also located within a Fire District boundary.

X. HYDROLOGY AND WATER QUALITY: Would the

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project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, the sites identified to satisfy the RHNA would not violate any water quality standards or waste discharge requirements as most are located within or adjacent to a sewer district. Those that are not, are large enough to provide adequate septic systems. All future residential development is also required to coordinate with Inyo County's Environmental Health Department and the Inyo County Building and Safety Department to ensure no degradation to surface and/or groundwater resources.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, most of the sites identified to satisfy the RHNA are located within or adjacent to a water district. Those that are not are on parcels large enough to meet well and septic system standards. They would also not use water in excess of any other residential development in the County. Any future development is required to obtain water from a district or be permitted for a well by the County Environmental Health Department and meet all State regulations pertaining to wells and groundwater.

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

- i) result in a substantial erosion or siltation on- or off-site;
- ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
- iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
- iv) impede or redirect flood flows?

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, any future residential project would be reviewed by the County Public Works Department for issues regarding erosion, storm-water drainage, grading and runoff. If any issues are identified during these reviews, the applicant would be required to avoid or mitigate impacts to drainage patterns.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, none of the sites identified to satisfy the RHNA are located within a flood hazard, tsunami or seiche zone.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Any future residential development identified within a water quality control or sustainable ground water management plan area would be required to follow it.

XI. LAND USE AND PLANNING: Would the project:

a) Physically divide an established community?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also the proposed sites identified to satisfy the RHNA are not located in a way that would physically divide an established community.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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avoiding or mitigating an environmental effect?

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also the proposed sites identified to satisfy the RHNA are located on parcels that have the appropriate General Plan and Zoning designations.

XII. MINERAL RESOURCES: Would the project:

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also the proposed sites identified to satisfy the RHNA are located within already established communities and/or neighborhoods where no known mineral resource would be foregone by possible residential development.

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?

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also the proposed sites identified to satisfy the RHNA are located within already established communities and/or neighborhoods where no known mineral resource would be foregone by possible residential development.

XIII. NOISE: Would the project result in the:

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Although there would be some construction related noise from the possible construction on sites identified to satisfy the RHNA, this noise would not exceed acceptable levels or be in excess of any other residential development that is already allowed.

b) Generation of excessive groundborne vibration or groundborne noise levels?

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Although there would be some construction related noise from the possible development on sites identified to satisfy the RHNA, this noise would not exceed acceptable levels or be in excess of any other residential development.

c) For a project located within the vicinity of a private airstrip or, an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, although some of the sites identified to satisfy the RHNA are within 2-miles of an airport, noise would not exceed acceptable levels or be in excess of any other residential development already found surrounding these sites.

XIV. POPULATION AND HOUSING: Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. The realization of development of the sites identified to satisfy the RHNA could induce some population growth. The proposed additional density based on these sites does not, however, exceed the already established and evaluated densities currently designated by the General Plan as a whole or per site.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing

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elsewhere?

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. The realization of development of the sites identified to satisfy the RHNA would not displace existing housing or create a situation where replacement housing will be necessary as they are all vacant lots.

XV. PUBLIC SERVICES: Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, all of the sites identified to satisfy the RHNA are located within a Fire District boundary.

Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, the sites identified to satisfy the RHNA are not located in areas with services concerns or in locations so remote that they would affect response times.

Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No new school service will be required because of this Housing Element Update.

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

Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the proposed Housing Element Update will not create a need for additional public services.

XVI. RECREATION: Would the project:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, Housing Element Update will not increase the use of existing recreational facilities. No portion of the Housing Element Update anticipates changes in the level of service required. The realization of development of the sites identified to satisfy the RHNA could induce some population growth. The proposed additional density based on these sites does not, however, exceed the already established and evaluated densities currently designated by the General Plan as a whole or per site.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No, the proposed Housing Element Update does not include, nor will it cause, a need for an increase in parks or other recreational facilities that might have an adverse physical effect on the environment. The realization of development of the sites identified to satisfy the RHNA could induce some population growth. The proposed additional density based on these sites does not, however, exceed the already established and evaluated densities currently designated by the General Plan as a whole or per site.

XVII. TRANSPORTATION:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Although the development of the sites proposed to satisfy the RHNA, could increase traffic, it would not affect public transit, bicycle, or pedestrian facilities as any possible development would also have to follow all programs, plans, ordinances or policies in place at the time of application.

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. The realization of development of the sites identified to satisfy the RHNA could induce some traffic growth. It is impossible to estimate trips that would be generated prior to an application, in the case that one is submitted, an evaluation would be conducted as appropriate. Also, the proposed density of these sites does not exceed the already established and evaluated densities currently designated by the General Plan as a whole or per site.

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, the sites identified to satisfy the RHNA are not located in areas that would cause the need for extensive road improvements as they are infill located in already established communities/neighborhoods.

d) Result in inadequate emergency access?

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, the sites identified to satisfy the RHNA, when developed, will need to provide for adequate emergency access as part of the Building and Safety Code requirements.

XVIII. TRIBAL CULTURAL RESOURCES: Would the project:

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

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, if any archaeological or cultural resource is discovered on the site during any future development, work shall immediately stop and Inyo County staff shall immediately be notified per Inyo County Code (ICC) Chapter 9.52, Disturbance of Archaeological, Paleontological and Historical Features of the Inyo County Code. Therefore, the project will not cause an adverse change in the significance of an archaeological resource if by chance one is discovered, pursuant to Public Resources Code Section 5020.1(k)

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Also, if any archaeological or cultural resource is discovered on the site during any future development, work shall immediately stop and Inyo County staff shall immediately be notified per Inyo County Code (ICC) Chapter 9.52, Disturbance of Archaeological, Paleontological and Historical Features of the Inyo County Code. The project description was also sent to Tribes requesting AB52 notification. A consultation was requested and held with the Bishop Paiute Tribe on May 27, 2021. No resources

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were identified by the Tribe during consultation. They indicated that they would review and comment on the CEQA document if appropriate. No other requests for consultation have been received.

XIX UTILITIES AND SERVICE SYSTEMS: Would the project:

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Possible construction of the sites identified to satisfy the RHNA will not result in the construction of new or expanded utility or service systems. Electricity is available to all of the sites identified to satisfy the RHNA and the sites are located within water and sewer districts or are on sites large enough to accommodate on-site wells and septic systems.

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

Yes, although the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development, the sites identified to satisfy the RHNA are within a water district or are on lots large enough to accommodate well and septic systems. They would also be required to meet the regulations set forth by the Building and Safety and Environmental Health codes regarding water use and availability. Also, the proposed density of these sites does not exceed the already established and evaluated densities currently designated by the General Plan.

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

No, although the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development, development of the sites identified to satisfy the RHNA would cause more demand on area waste water treatment facilities. These sites are all located either within a sewer district or are on lots large enough to accommodate well and septic systems. Also, the proposed density of these sites does not exceed the already established and evaluated densities currently designated by the General Plan.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

No, although the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development, development of the sites identified to satisfy the RHNA would cause more solid waste. Solid waste would not be generated at a higher rate than any other residential development in the County, however. Also, the proposed density of these sites does not exceed the already established and evaluated densities currently designated by the General Plan.

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

No, although the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development, development of the sites identified to satisfy the RHNA would cause more solid waste. This development, however, would be required to comply with Inyo County's solid waste standards, as required by the Inyo County Department of Environmental Health.

XX. WILDFIRE:

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. The sites proposed in the Update to satisfy the RHNA would not affect an adopted emergency response or evacuation plan as the development is proposed in areas that are already developed and are not in areas with high hazard potential.

b) Due to slope, prevailing winds, and other factors, exacerbate

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wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development there are no extenuating factors that will expose project occupants to pollutant concentrations from wildfire. Although smoke from wildfires surrounding residential locations throughout the County is possible, potential risk is reduced by compliance with California Building Standards and all of the locations identified in the Update to satisfy the RHNA are located within a Fire Protection District.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Any residential development of the sites identified to satisfy the RHNA would have to be evaluated on a case by case basis at the time of application to identify if any additional wildfire associated infrastructure would be necessary.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Any residential development of the sites identified to satisfy the RHNA would have to be evaluated on a case by case basis at the time of application to identify if any exposure to significant post-fire risks would be applicable.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Development of the sites identified to satisfy the RHNA would not impact or degrade the quality of the environment as these sites are all located in areas that are already developed and/or subdivided and are infill lots. Also, any residential development of these sites would have to be evaluated on a case by case basis at the time of application to identify the potential to substantially reduce habitat for fish and wildlife species or eliminate important examples of California history.

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Development of the sites identified to satisfy the RHNA would not have impacts that are individually limited, but cumulatively considerable. The total number of units that can be added based on the sites identified to satisfy the RHNA does not exceed what has previously been evaluated for the County's General Plan nor do they exceed the currently allowable number of units as a whole or per site.

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

No, the Housing Element Update does not include any specific development designs or proposals, nor does it grant any entitlements for development. Development of the sites identified to satisfy the RHNA would not have environmental effects which will cause

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substantial adverse effects on human beings either directly or indirectly. The proposed Housing Element could, instead, have positive impacts resulting from additional housing opportunities for the citizens of Inyo County.

