



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

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

**DRAFT NEGATIVE DECLARATION OF ENVIRONMENTAL IMPACT AND
INITIAL STUDY**

PROJECT TITLE: Reclamation Plan 2020-01/SouthwestPumice LLC.

PROJECT LOCATION: Pumice Mine Road is located on BLM land approximately 6 miles NorthEast of Coso Junction, California. The proposed mine reclamation located in section 22, Township 21S North, Range 38E, Mount Diablo Meridian with Tax Assessor Parcel Number (APN) 037-270-02.

PROJECT DESCRIPTION: The Bureau of Land Management has awarded Southwest Global Pumice a Pumice Materials-Sale Contract. Southwest Global Pumice has applied for a reclamation plan near Coso Junction as required by Surface Mining And Reclamation Act. The proposal consists of a previously approved 12.23 exploratory drilling project that transitions into an active open-pit pumice mine. The applicant also proposes expanding an additional 11.98 acres for a total disturbance of 25 Acres.

FINDINGS:

- A. The proposed project is consistent with the 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 21-day public & State agency review period for this Draft Negative Declaration will expire on January 11, 2022. 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.

Ryan Kay Stambidge

Name

1/19/22

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.



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

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

INYO COUNTY PLANNING DEPARTMENT

APPENDIX G: CEQA INITIAL STUDY & ENVIRONMENTAL CHECKLIST FORM

1. Project title: Reclamation Plan 2020-01/SouthwestPumice LLC.
2. Lead agency name and address: Inyo County Planning Department, PO Drawer L, Independence, CA 93526
3. Contact person and phone number: Ryan Standridge: (760) 878-0405
4. Project location: Pumice Mine Road is located on BLM land approximately 6 miles NorthEast of Coso Junction, California. The proposed mine reclamation located in section 22, Township 21S North, Range 38E, Mount Diablo Meridian with Tax Assessor Parcel Number (APN) 037-270-02.
5. Project sponsor's name and address: Thomas Hrubik, Southwest Global Pumice LLC, P.O. Box 174 Apple Valley, CA 92307.
6. General Plan designation: State and Federal Land (SFL)
7. Zoning: Open Space, 40-acre minimum (OS-40)
8. Description of project: The applicant has applied for a reclamation plan near Coso Junction. The proposal consists of a previously approved 12.23 exploratory drilling project and transitioning into an active open-pit pumice mine. The applicant also proposes expanding an additional 11.98 acres for a total disturbance of 25 Acres.
9. Surrounding land uses and setting: The Property is surrounded by Vacant Public lands.

Location:	Use:	Gen. Plan Designation	Zoning
Site	Mine	State and Federal Lands (SFL)	Open Space, 40-acre minimum (OS-40)
North	Vacant Public Land	State and Federal Lands (SFL)	Open Space, 40-acre minimum (OS-40)
East	Naval Weapons Center Vacant Land	State and Federal Lands (SFL)	Open Space, 40-acre minimum (OS-40)
South	Naval Weapons Center Vacant Land	State and Federal Lands (SFL)	Open Space, 40-acre minimum (OS-40)
West	Vacant Land	State and Federal Lands (SFL)	Open Space, 40-acre minimum (OS-40)

10. Other public agencies whose approval is required: Inyo County Environmental Health, Department of Conservation, Bureau of Land Management.

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 30-day Tribal Consultation opportunity period, according to Public Resource code section 21080.31, by sending out certified written notices on May 13, 2021, inviting the Tribes to consult on the project. It described the project and location. 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, Cabazon Band of Mission Indians, and the Torrez Martinez Desert Cahuilla Indians. Since no comments have been provided and no formal consultation meeting date requested, staff is submitting this Negative Declaration for a 30-day review and comment period. The County will continue to be open to consultation with the Tribe during this period. If the Tribe does not provide comments or schedule a formal consultation meeting within this 30-day period, the County, per Public Resources Code 21082.3 (d)(2) will consider the consultation process complete and certify the Negative Declaration of Environmental Impact.

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 checked="" type="checkbox"/> Air Quality |
| <input checked="" 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 mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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



Name

1/19/22

Date

INYO COUNTY PLANNING DEPARTMENT ENVIRONMENTAL CHECKLIST FORM

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

I. AESTHETICS -- Would the project:

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

No, the project's mining reclamation areas location is isolated near Cactus peak and not visible from Highway 395.

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

No, the proposed expansion will not damage scenic resources; there are no nearby trees rock outcroppings or historic buildings in the general area.

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, the mining reclamation area is in an isolated area near Cactus peak that is not visible from Highway 395. Although views of the mining reclamation might be visible from the relocation of a small portion of the SE-431 route or high points on surrounding public lands, it will not affect the overall scenic integrity of the area as the views would be from a considerable distance.

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

No, the proposed mining reclamation will not create a new source of substantial light or glare as site operations are conducted during daylight. The applicant has not submitted any security lighting at this time, but the reclamation plan will be conditioned that all outdoor light fixtures use low-energy, shielded light fixtures which direct light downward and 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:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No, the project is not located on farmland.

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

No, the proposed mining reclamation will not be located on land zoned for agriculture. There are no Williamson Act contracts in Inyo County.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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))? <i>No, the project is not located on timberland.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use? <i>No, the project is not located on forestland.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? <i>No, the project is not located on farmland.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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? <i>No, although there are portions of Inyo County within non-attainment areas for Federal and State PM10 (particulate matter 10 microns or less in diameter) ambient air quality standards, the primary source for this pollution is the Owens dry lake, located approximately 25-miles from the project site. The applicant will also be subject to Great Basin Unified Air Pollution Control District regulations regarding dust mitigation during operation and all processing equipment is permitted with the Great Basin Unified Air Pollution Control District.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? <i>No, although there are portions of Inyo County within non-attainment areas for Federal and State PM10 (particulate matter 10 microns or less in diameter) ambient air quality standards, the primary source for this pollution is the Owens dry lake, located approximately 25-miles from the project site. The applicant will also be subject to Great Basin Unified Air Pollution Control District regulations regarding dust mitigation during operation and all processing equipment is permitted with the Great Basin Unified Air Pollution Control District.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? <i>No, although there are portions of Inyo County within non-attainment areas for Federal and State PM10 (particulate matter 10 microns or less in diameter) ambient air quality standards, the primary source for this pollution is the Owens dry lake, located approximately 25-miles from the project site. The applicant will also be subject to Great Basin Unified Air Pollution Control District regulations regarding dust mitigation during operation and all processing equipment is permitted with the Great Basin Unified Air Pollution Control District.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations? <i>No, there are no sensitive receptors near the project location. The nearest community is Olancha 20 miles away.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

No, the pumice mine does not create odor affecting a substantial number of people. Also, there are no sensitive receptors near the project location. The nearest community is Olancho 20 miles away.

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?

Applicant-supplied biologists conducted the biological analysis with RCA Associates, Inc. (RCA). RCA performed CNNDDB and California Native Plant Society (CNPS) database queries to identify special-status plant and wildlife species that could potentially be found in the project impact area. RCA conducted field surveys for special status species between the 23rd and 29th of May 2019. This query found potential habitat for the following species: Boothe's Primrose, Pinyon Rock Cress, Death Valley beardtongue, Charlette's phacelia, Joshua tree, Desert tortoise, LeConte's Thrasher, Burrowing owl, Mojave ground squirrel. The Ridgecrest BLM reviewed this project under NEPA for the mining of pumice and granted Southwest Global Pumice a sales contract. The applicant will apply for a 2081 Incidental Take Permit to mitigate the impacts to less than significant as a condition of approval for issuing their permit. The applicant proposed a silt fence or a 3-foot berm around the mining area (1) and the production plant to reduce the risk of the Mojave Ground Squirrel or Dessert Tortoise coming onto the site. See the attached site plan. Under a qualified biologist's supervision, Southwest Global Pumice will relocate 8 Joshua trees on the proposed site plan and relocate 2 Boothe's Primrose plants with BLM approval. Inyo County will condition the reclamation plan with the same conditions.

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?

No, the project site has no identified riparian habitat based on the USFWS National Wetlands Inventory Mapping Tool or any nearby riparian habitat affected by the project.

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, the project site has no identified riparian habitat based on the USFWS National Wetlands Inventory Mapping Tool or federally protected wetland habitats affected by the project.

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

Although the project site could potentially have wildlife species, the project will not interfere with migratory fish or wildlife species under the Migratory Bird Treaty Act (MBTA). The BLM's pumice sales contract requires a survey when mining occurs between April 15th and July 15th. A qualified biologist must conduct a pre-mining study and determine the presence/absence of active nests within or adjacent to the area to be mined. A pre-mining survey will not be required if mining activities occur between July 16th and April 14th. Inyo County will condition the reclamation plan with the same condition.

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

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

No, there are no local policies or ordinances protecting biological resources that pertain to the project site.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

No, there are no adopted habitat or conservation plans that affect the project site.

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

No, the county approved the original exploratory drilling in August 1997 with disturbance restricted to 12.23 acres. Also, this project has already been reviewed under NEPA by the BLM. An archaeological investigation was conducted in 2019 for approximately 25 acres of land, including and surrounding the proposed mining reclamation area, and determined that there are no resources that would be defined per 15064.5. In the unlikely event an archaeological or cultural resource is discovered on the site during any future development, work shall immediately stop and Inyo County staff shall be notified per Inyo County Code (ICC) Chapter 9.52, Disturbance of Archaeological, Paleontological and Historical Features of the Inyo County Code.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------

No, the county approved the original exploratory drilling in August 1997 with disturbance restricted to 12.23 acres. Also, this project has already been reviewed under NEPA by the BLM. An archaeological investigation was conducted in 2019 for approximately 25 acres of land, including and surrounding the proposed mining reclamation area, and determined that there are no resources that would be defined per 15064.5. In the unlikely event an archaeological or cultural resource is discovered on the site during any future development, work shall immediately stop and Inyo County staff shall be notified per Inyo County Code (ICC) Chapter 9.52, Disturbance of Archaeological, Paleontological and Historical Features of the Inyo County Code..

c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

No, the county approved the original exploratory drilling in August 1997 with disturbance restricted to 12.23 acres. Also, this project has already been reviewed under NEPA by the BLM. An archaeological investigation was conducted in 2019 for approximately 25 acres of land, including and surrounding the proposed mining reclamation area, and determined that there are no resources that would be defined per 15064.5. In the unlikely event an archaeological or cultural resource is discovered on the site during any future development, work shall immediately stop and Inyo County staff shall 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

No, the project is mining reclamation; the site does not have buildings or power poles that require electricity; therefore, the proposed reclamation area does not impact the consumption of energy resources during operations.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

No, the project is not located in one of the County's Solar Energy Development Areas (SEDA).

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

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

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 project is not in an Alquist-Priolo zone.

ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
------------------------------------	--------------------------	--------------------------	-------------------------------------	--------------------------

Ground shaking may occur anywhere in the region, due to numerous earthquake faults, regardless of whether the project site is within an identified Alquist-Priolo zone or not. However, the Uniform Building Code ensures that future structures shall be constructed to required seismic standards (Level IV) in order to withstand such shaking, so this potential impact is considered less than significant.

iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

No, the project area is not within an area of soils known to be subject to liquefaction.

iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
-----------------	--------------------------	--------------------------	--------------------------	-------------------------------------

No, the project area is not subject to landslides.

b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

No, the proposed mining reclamation shall conform to all drainage, grading, and "Best Management Practice (BMP)" requirements as set forth by BLM and all other associated regulatory agencies, will be written into the Conditions of Approval for the permit. As a result of these regulations, potential impacts are considered less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

No, the project is not located on a geologic unit or soil that is considered unstable.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

No, the project is not located on a geologic unit or soil that is considered expansive.

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

No, the site has portable toilets on-site and is serviced by a commercial vendor; therefore, the project will not create a need for upgrades to the existing waste disposal systems as it will not create additional waste.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

No, the project site does not include a unique paleontological or geologic feature.

VIII. GREENHOUSE GAS EMISSIONS:

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------

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

impact on the environment?

No, all equipment used at the mining site meet California's CO2 emission requirements, follow best management practices, and shall be subject to Great Basin Unified Air Pollution Control District regulations regarding dust mitigation during operations and shall be required to obtain all necessary permits from Great Basin Unified Air Pollution Control District.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

No, all equipment used at the mining site meet California's CO2 emission requirements, follow best management practices, and shall be subject to Great Basin Unified Air Pollution Control District regulations regarding dust mitigation during operations and shall be required to obtain all necessary permits from Great Basin Unified Air Pollution Control District.

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

No, Chemicals are not used on-site; no chemical processing occurs on-site only crushing and screening. There will be no chemical waste or pollution from the mining operation.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

No, equipment and vehicles get transported to the Apple Valley shop for standard maintenance. Emergency maintenance and refueling comply with all rules and regulations regarding implementing proper fueling procedures, fuel, waste oil storage, spill control measures, and employee training per their Emergency Response Plans and Procedures on file with the Inyo County Environmental Health Services (EHS). EHS is the Certified Unified Program Agency (CUPA) that oversees hazardous materials storage, use, generation, and disposal. EHS will continue to permit.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

No, the proposed project is not within one-quarter mile of an existing or proposed school.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

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

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

No, the mining reclamation is not included in an airport land use plan or within two miles of a public or public use airport.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

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

residing or working in the project area?

No, the mining reclamation is not located in the vicinity of a private airstrip.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

No, the mining reclamation will not physically interfere with an adopted emergency plan or emergency evacuation plan.

h) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

No, the mining reclamation location is not adjacent to any urbanized area and the surrounding area is BLM vacant land.

X. HYDROLOGY AND WATER QUALITY:

Would the 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"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------

No, the currently approved Makayla I mine site will be in reclamation, and the existing water policy will remain in place with the relocation to the Makayla II site. Water supply is from an existing off-site well located across highway 395. A water truck (currently a 4,000-gallon truck) wets down material and roads during mining activities. Southwest Global Pumice may use approximately 28,000 gallons of water for dust suppression activities around 200 days per year, which amounts to approximately 17.2 acre-feet annually. Southwest Global Pumice will continue to provide employees with bottled water.

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"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

No, the currently approved Makayla I site will be in reclamation, and the existing water policy will remain in place with the mining operation relocating to the Makayla II site. Water supply is from an existing off-site well located across highway 395. A water truck (currently a 4,000-gallon truck) wets down material and roads during mining activities. Southwest Global Pumice may use approximately 28,000 gallons of water for dust suppression activities around 200 days per year, which amounts to approximately 17.2 acre-feet annually. Southwest Global Pumice will continue to provide employees with bottled water.

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

No, the project site is composed of volcanic cinder gravels and sands. This material is very porous and there are no drainages or impervious surfaces on-site. Erosion is not an issue of concern on-site.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------

No, the project site is composed of volcanic cinder gravels and sands. This material is very porous, and there are no drainages or impervious surfaces on-site. Erosion is not a concern on-site. The mining reclamation is required to conform to all drainage, grading, and "Best Management Practice" (BMP) requirements set forth by the Inyo County Public Works Department, Inyo County of Inyo Environmental Health Services Department, and other associated regulatory agencies. As a result of this regulation, potential impacts are considered less than significant.

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

No, the project site is composed of volcanic cinder gravels and sands. This material is very porous, and there are no drainages or impervious surfaces on-site. Erosion is not an issue on-site.

iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
-------------------------------------	--------------------------	--------------------------	--------------------------	-------------------------------------

The project area is not located in any flood hazard areas and will not potentially redirect flood flows.

d) 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"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

No, the project is not proposed in an area that is included in a water quality control or sustainable ground water management plan.

e) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

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

f) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

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

g) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

No, the proposed mining reclamation is not in an area subject to flooding due to the failure of a levee or dam. Average annual rainfall in this area is 7-inches to 10-inches.

h) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

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

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"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

No, the proposed reclamation plan does not 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 avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

The proposed project is consistent with the County Zoning Ordinance designation of 'Open Space (OS). The OS designation conditionally allows mining uses (Inyo County Code, Title 18, Section 18.12.040 I. Mining uses are also allowed if approved by the Bureau of Land Management accompanied by a reclamation plan approved by Inyo County under a Memorandum of Understanding between the County and the BLM). These include the mining and processing of natural resources, including open pits. The proposed mining reclamation plan is a continued mining use. The General Plan consists of a policy that protects the current and future extraction of mineral resources essential to the County's economy while minimizing impacts of this use on the public and the environment.

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

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

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

No, the proposed project will not conflict with any habitat conservation plan or natural community conservation plan—the project site is located in a previous exploratory mining area that has been disturbed.

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?

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

No, this project is the mining of a mineral; however, this mineral is in abundance in the area and mining this small deposit will not deplete the mineral resource. The Inyo County General Plan encourages such mining. The impact to this resource is very small considering the great quantities of it that are available within Inyo County.

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

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

No, the project will have no impact on the resource.

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?

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

No, the proposed reclamation plan can increase the ambient noise level in the project's vicinity; however, the proposed site is secluded in the Coso Mountains range near cactus peak, and the nearest community is Olancho, approximately 20 miles away.

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

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

No, although the mining operation requires the use of heavy construction equipment the nearest community is approximately 20 miles away.

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?

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

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

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)?

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

No, the proposed project transitions from exploratory to active mining with an expansion. It does not include housing and is not an infrastructure improvement that would cause a population increase.

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

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

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

No, the proposed project transitions from exploratory to active mining with an expansion will not result in a loss of housing units or the displacement of people.

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"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

No, the proposed project transitions from exploratory drilling to active mining with an expansion. It will not cause high demand for additional services, resulting in an overall loss in service provision.

Police protection?

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

No, the proposed project transitions from exploratory drilling to active mining with an expansion. It will not cause high demand for additional services, resulting in an overall loss in service provision.

Schools?

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

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

Parks?

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

No new parks will be required because of this project.

Other public facilities?

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

No, the proposed project 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"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

No, the proposed project will not increase the use of existing recreational facilities. No portion of this project anticipates any change in the level of service required.

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"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

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

XVII. TRANSPORTATION:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit,

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

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

roadway, bicycle and pedestrian facilities?

No, the proposed project transitions from exploratory drilling to active mining with an expansion. It will have no impact on adopted transportation plans, policies, or programs.

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

No, The project is consistent with CEQA Guidelines § 15064.3, subdivision (b). the applicant has stopped production of pumice and is currently reclaiming the Makayla I site. Production will resume after the approval of Makayla II expansion reclamation plan , and vehicle miles traveled will remain the same.

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 proposed project transitions from exploratory drilling to active mining with an expansion. It will not cause a need for changes to the roads in the area.

d) Result in inadequate emergency access?

No, the proposed project transitions from exploratory drilling to active mining with an expansion. It will not create losses of emergency access.

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, this project has already been reviewed under NEPA by the BLM. The proposed project does not encompass a resource eligible for listing in the California Register of Historical Resources or a local register or historical resources as defined in Public Resource Code section 5020.1(k). If any archaeological or cultural resources are discovered on the site, work shall stop and Inyo County staff shall be immediately notified per Chapter 9.52, Disturbance of Archaeological, Paleontological and Historical Features of the Inyo County Code.

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 proposed project transitions from exploratory drilling to active mining with an expansion does not encompass a resource determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of the Public Resource Code section 5024.1. The project description was also sent to Tribes requesting AB52 notification. No requests for additional information have been received from the Tribes. If cultural resources are discovered in the project area, work will be stopped and a local Tribal representative will be consulted with to determine the significance of the finding and the proper handling of the resource will be required.

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

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 proposed project will not result in the construction of new or expanded utility or service systems. The proposed project does not require electricity or waste facilities. All stormwater received at this site will be contained on-site or diverted into existing drainage channels and will not require new or an expansion of existing stormwater drainage facilities.

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

Yes, the proposed project transitions from exploratory drilling to active mining with an expansion. The mining operations will move to the new Makayla II site upon approval and closure of the Makayla I site. The water use on-site minimizes dust generation and will remain the same. The water supply is from an existing off-site well.

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, the proposed project will not be serviced by a wastewater treatment facility.

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, the project is served by a county landfill that has the capacity to accommodate the project's solid waste disposal needs. All refuse is disposed into approved trash bins and removed by a commercial garbage hauler.

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

Yes, the applicant will be required to comply with federal, state and local statutes and regulations related to solid waste.

XX. WILDFIRE:

Would the project:

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

No, the project will not interfere with the implementation of an adopted emergency plan.

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?

No, the project site is comprised of pumice, gravel, and sand. The site's vegetation will remain sparse until the completion of mining occurs, and final slope, seed distribution has been accomplished to reduce the risk of wildfire.

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

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

temporary or ongoing impacts to the environment?

No, the project will not cause the need for additional wildfire-associated infrastructure. The project site is also located within a Federal Responsibility Area.

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 nearest community is Olancha 20 miles away. The site consists of highly permeable soils and will not create downslope or downstream flooding or landslides.

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 project will not impact or degrade the quality of the environment. Southwest Global Pumice can mitigate the project area's resource impacts to less than significant. Inyo County will write mitigation measures into the Conditions of Approval for the permit. The applicant shall work with the Great Basin Air Pollution Control District (GBAPCD) to operate in such a way as to minimize potential air quality effects from the mining operation and reclamation plan. The applicant shall work with CDFW to mitigate the special status species' impacts and obtain a 2081 Incidental Take permit. If any vegetation removal activities occur between March 15 – September 15. A pre-construction survey shall be conducted for nesting birds, no more than 3-days before construction, and submitted to the Planning Department and the BLM. A qualified avian biologist shall prepare and implement a Nesting Bird Plan if active nests are found, per CDFW requirements. Any grubbing or vegetation removal shall occur outside peak breeding season. Southwest Global Pumice will be required to follow all State and local regulations regarding hazardous materials. The proposed project does not encompass a resource eligible for listing in the California Register of Historical Resources or a local register or historical resources defined in Public Resource Code section 5020.1(k). Work shall stop if any archaeological or cultural resources are discovered on the site. Inyo County staff shall be immediately notified per Chapter 9.52, Disturbance of Archaeological, Paleontological, and Historical Features of the Inyo County Code.

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)?

The proposed mining reclamation is located in a remote location and none of the impacts of this project will be cumulatively considerable.

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

No, Southwest Global Pumice will remove all equipment and debris from the site upon completion of mining. The site perimeter berm will restrict public access to the site for the life of the mine operation. Warning signs with contrasting background lettering shall install at access points into the quarries stating “No Trespassing - Keep Out; Surface Mining Operation” or similar. Also, the reclaimed 2H:1V slopes will be of sufficient low gradient to not cause a hazard to public safety.