



Initial Study And Mitigated Negative Declaration

Paradise Camp Dump Site Remediation Project

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Section 1

Project and Agency Information

1.1 PROJECT TITLE AND LEAD AGENCY

Project Title:	Paradise Camp Dump Site Remediation Project
Lead Agency Name:	Los Angeles Department of Water & Power
Lead Agency Address:	111 North Hope Street, Room 1044 Los Angeles, California 90012
Contact Person:	Mr. Christopher Lopez
Contact Phone Number:	(213) 367-3509
Project Sponsor:	Same as Lead Agency

1.2 PROJECT BACKGROUND AND OBJECTIVES

The City of Los Angeles Department of Water and Power (LADWP) is the lead agency under the California Environmental Quality Act (CEQA) and has prepared this Initial Study (IS) to address the impacts of remediation of the Paradise Camp Dump Site (proposed project). LADWP is the public agency with principal responsibility for carrying out the remediation. Remediation and closure of the site (Solid Waste Information System [SWIS] Number 26-CR-0009) are overseen by the California Department of Resources Recycling and Recovery (CalRecycle), and the Mono County Department of Environmental Health (the Local Enforcement Agency [LEA]).

1.2.1 LADWP

The City of Los Angeles (City) is a municipal corporation and charter city organized under the provisions of the California Constitution (art. XI, § 3(a)). LADWP is a proprietary department of the City that supplies water and power to its citizens pursuant to the Los Angeles City Charter. LADWP is a vertically owned utility, meaning it owns its own power generation, transmission and distribution in order to provide safe, economically sustainable and reliable electrical energy to over 4 million residents in an environmentally responsible manner. Additionally, LADWP owns water gathering, transmission, storage, treatment, and distribution facilities to provide safe, economically sustainable, and dependable water to residents and businesses in LADWP's service area in an environmentally responsible manner. A five-member Board of Water and Power Commissioners oversees the LADWP. The Board members are appointed by the Mayor and confirmed by the City Council for 5-year terms. The Board is the decision making body for the consideration and adoption of the Paradise Camp Dump Site Remediation Project and the CEQA document for the project.

The IS has been prepared in accordance with CEQA, Public Resources Code Section 21000 et seq., and the State CEQA Guidelines, Title 14 California Code of Regulations (CCR) Section

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15000 et seq. The IS serves to identify the site-specific impacts, evaluate their potential significance, and determine the appropriate documents needed to comply with CEQA. LADWP has determined, based on the information reviewed and contained herein, that the proposed project could potentially have a significant environmental impact, but that mitigation measures can be implemented to reduce the impacts to a level of less than significant. Based on this IS, a Mitigated Negative Declaration (MND) is the appropriate CEQA document. Staff recommends that the City of Los Angeles Board of Water and Power Commissioners adopt this IS/MND for the proposed project.

1.2.2 CalRecycle

CalRecycle is a branch of the California Environmental Protection Agency that oversees the state's waste management, recycling, and waste reduction programs. In January 2010, CalRecycle was created from a merge of the Department of Conservation, Division of Recycling and the California Integrated Waste Management Board (CIWMB). Regulations approved before 2010 refer to CIWMB, CalRecycle's predecessor, and those created after January 2010 refer to CalRecycle.

1.2.3 Mono County Environmental Health

LEAs are designated by the governing body of a county or city and, upon certification by CalRecycle, are empowered to implement delegated CalRecycle programs and locally designated activities. Mono County Environmental Health ensures that solid waste permit processes and procedures, closure and post-closure requirements, and solid waste facility operations are all conducted in keeping with the Public Resources Code, Title 14 and Title 27. The LEA performs periodic inspections of all solid waste facilities located within the county, including active, closed, illegal and abandoned solid waste sites to ensure that these facilities are in compliance with CalRecycle State Minimum Standards. The LEA ensures that there are no solid waste related nuisances or health and safety impacts. LEAs also carry out enforcement activities to ensure that solid waste is collected, handled and disposed according to applicable laws and regulations, solid waste facility permit conditions and operating documents.

1.2.4 Lahontan Regional Water Quality Control Board

The Lahontan Regional Water Quality Control Board has oversight on landfill closures through the issuance of Waste Discharge Requirements (WDRs).

1.2.5 Project Background

1.2.5.1 Project History

Previously operated by Mono County, LADWP currently owns the Paradise Camp Dump solid waste disposal area. According to the SWIS online database, the site ceased dumping operations in 1973. Illegal dumping has occurred more recently.

Based on geophysical magnetic and electromagnetic surveys conducted on December 22 and 23, 2015 (Southwest Geophysics), and a limited site investigation conducted on April 26, 2016, two areas where a majority of the waste is presumed to have been dumped have been mapped (east and west anomalous areas) (Geo-Logic Associates, 2017). Twelve exploratory test pits were excavated

to evaluate the eastern anomaly. Burn ash and other solid wastes occupy an estimate 0.21 acre area approximately 230 feet long by 40 feet wide, and up to 5 feet thick. Since the wastes are covered by a minimum of 6 inches of soil, and more than 1 foot of soil at most locations, wastes in the eastern anomaly are not considered an exposure hazard to the public. The volume of waste in the eastern anomaly is conservatively estimated at 1,697 cubic yards.

The western anomaly includes mounds of soil and exposed waste (0.23 acres) and an approximately 3.5-acre debris field of refuse primarily down-slope of the anomaly and south of the mounds; this waste is estimated at 1,285 cubic yards. Four test pits were excavated, revealing soil mixed with metal debris, glass, and a small amount of unburned municipal solid waste. No burn ash was observed in the test pits. The wastes were observed within 1 foot of ground surface.

Native soils were sampled at three background locations, and waste samples were collected from four of the exploratory test pits. Waste samples were analyzed for total concentrations of 17 metals, total petroleum hydrocarbons (TPH; gasoline range, diesel range, and waste oil range), benzene, toluene, ethylbenzene, and xylenes, and semivolatile organic compounds. An additional 20 near-surface waste samples were collected by CalRecycle on September 21, 2016, and were analyzed for the same constituents, and dioxins and furans. **Table 1** summarizes the analytical results. Soluble lead concentrations exceeded the State of California hazardous waste criterion of 5 milligrams per liter in 11 samples. These 11 samples are concentrated in three separate areas with an estimated waste volume of 350 cubic yards. No other constituent concentration exceeded a State of California or federal hazardous waste criterion. However, several samples contained concentrations of lead, thallium, and arsenic that exceed the respective United States Environmental Protection Agency Region IX Regional Screening Levels for residential soils.

Based on the site investigation, three remediation alternatives were identified:

1. Remove Hazardous Wastes and Surficial Recyclable Debris from the Western Anomaly; No Action in the Remainder of the Site
2. Remove Hazardous Waste; Screen, Recycle, Reconsolidate, and Cover Surface Debris in the Western Anomaly; Increase Cover Thickness in Eastern Anomaly
3. Clean Closure – Complete Removal of All Wastes

On August 1, 2016, CalRecycle staff conducted a routine inspection of the Paradise Camp Dump since it is a pre-regulation closed dumpsite. No evidence of recent waste disposal or recent illegal dumping was observed. Areas of concern were identified relative to Title 27, Environmental Protection--Division 2, Solid Waste, Chapter 3. Criteria for All Waste Management Units, Facilities, and Disposal Sites, Subchapter 5. Closure and Post-Closure Maintenance:

- Per §21140, the final cover shall provide waste containment to protect public health and safety. Exposed waste was observed throughout this site, consisting mostly of metal cans, broken glass, and an old rusted car. It appears as though waste has become exposed and dispersed through wind and water erosion.

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- Per §21150, drainage and erosion control features shall be maintained to prevent public contact with waste, to prevent safety hazards, and to prevent exposure of waste. Exposed waste was observed throughout this site, consisting mostly of metal cans and broken glass, and an old rusted car. It appears as though waste has become exposed and dispersed through wind and water erosion.
- Per §21135, waste at this site is located east of the Paradise transfer station and in close proximity to Lower Rock Creek Road. Although waste is not obvious from the road, there is unrestricted access to this site, which has exposed waste consisting of broken glass, metals, and an old car.

1.2.6 Project Objective

The objective of the project is to stabilize the existing wastes, reduce existing and future exposure risks, and minimize the potential for future illegal waste disposal at the Paradise Camp Dump site. The objective of the Waste Removal and Consolidation Work Plan is to define the elements of the remediation to successfully address concerns identified during CalRecycle's 2016 inspection.

1.3 PROJECT LOCATION AND ENVIRONMENTAL SETTING

Paradise Camp Dump site is located near the Paradise Transfer Station in Mono County, California (**Figures 1 and 2**). The site is located in Section 32, R31E, T5S on the Rovana, California U.S. Geological Survey (USGS) 15-minute quadrangle map, with a latitude/longitude of 37.46690 / -118.59243. Access to the site is via Lower Rock Creek Road. The site is located just west of Highway 395, approximately 13 miles northwest of Bishop, California. Lower Rock Creek runs west of, and immediately adjacent to, the project site. The closest residences to the dump site are approximately 0.6 mile to the south and 1 mile to the northwest in the community of Paradise.

The transfer station is used for temporary storage of wastes; residents can drop off their solid waste, including household and commercial waste, construction and demolition waste, greenwaste, recyclables, e-waste, household hazardous waste (HHW), tires, and metal scrap. These wastes are eventually transported to the landfill, HHW facility, or recycling facility. The transfer station will remain open during the remediation project.

The area is primarily an upland site with two ephemeral washes with periodic flow. The majority of the site is composed of ruderal vegetation consisting of weedy annuals and early seral perennial shrubs. The creek contains riparian vegetation and species associated with a shallow water table. The riparian corridor, dump, and surrounding area were burned in the Round Fire which occurred February 6, 2015 (LADWP, 2017).

**Table 1
Paradise Camp Dump Soil Analytical Results**

ANALYTE	Samples Collected on April 26, 2016																Samples Collected on September 21, 2016																ARAR	
	BG-1	BG-2	BG-3	TP-1	TP-12	TP-14	TP-16	PS-1	PS-2	PS-3	PS-4	PS-5	PS-6	PS-7	PS-8	PS-9	PS-10	PS-11	PS-12	PS-13	PS-14	PS-15	PS-16	PS-17	PS-18	PS-19	PS-20	EPA Region IX RSL (Resident)	TTL ⁽¹⁾					
METALS (mg/kg) by EPA 6010B - Total Threshold Limit Concentration (TTL)																																		
Antimony	2.4	2.5	2.3	2.4	2.3	2.3	2.5	2.4	2.3	2.5	2.3	3.0	2.4	2.3	2.4	2.3	2.3	2.5	2.4	2.5	2.4	2.4	2.5	2.5	2.4	2.4	2.5	31	500					
Arsenic	1.0	0.99	0.92	1.3	0.92	0.94	0.99	1.9	1.9	3.6	3.8	3.7	1.9	1.8	4.5	1.8	17	3.8	3.2	3.3	2.7	1.5	1.8	2.6	3.7	3.6	3.2	0.068	500					
Barium	47	49	78	140	53	88	65	100	50	150	150	88	53	110	140	140	120	97	80	160	79	52	51	53	68	74	150	16,000	10000					
Beryllium	0.49	0.50	0.46	0.47	0.46	0.47	0.50	0.48	0.47	0.49	0.47	0.46	0.48	0.46	0.47	0.46	0.46	0.49	0.48	0.49	0.48	0.49	0.49	0.49	0.49	0.48	0.50	1600	75					
Cadmium	0.58	0.71	1.3	1.9	2.0	2.0	1.2	0.55	0.37	1.3	1.7	1.2	0.37	1.4	1.9	1.7	1.6	0.48	0.78	1.4	0.96	0.29	0.31	0.35	0.65	1.2	1.3	78	100					
Chromium (Total)	3.6	4.3	11	12	15	9.2	10	11	8.7	18	19	13	7.7	30	29	16	28	5.1	4.0	5.4	4.8	3.4	4.0	3.8	5.0	4.6	8.6	120,000	2500					
Cobalt	2.6	2.5	3.2	7.2	3.6	3.4	4.1	3.5	2.8	5.0	4.6	4.1	3.0	4.3	6.5	3.1	5.2	4.1	3.8	3.2	4.0	2.8	2.8	3.0	4.3	3.1	4.5	23	8000					
Copper	5.3	5.6	8.5	27	36	38	10	13	7.1	70	31	20	10	77	85	43	26	12	13	18	29	6.6	7.0	8.6	33	14	34	3100	2500					
Lead	4.3	3.9	4.0	28	8.5	120	16	57	27	140	200	99	27	98	180	240	280	22	86	97	330	6.0	4.6	9.4	22	36	200	80	1000					
Mercury (EPA 7471A)	0.088	0.088	0.088	0.080	0.078	0.15	0.089	0.082	0.082	0.079	0.078	0.080	0.086	0.081	0.13	0.095	0.080	0.078	0.083	0.076	0.091	0.080	0.089	0.085	0.083	0.080	0.088	11	20					
Molybdenum	0.53	0.50	0.46	0.91	0.46	0.93	0.50	0.80	0.23	1.3	1.8	0.78	0.48	2.4	1.9	0.67	1.7	0.93	0.99	0.79	0.94	0.49	0.49	0.57	0.88	0.89	1.7	390	3500					
Nickel	4.0	2.0	4.0	7.3	4.2	4.7	3.9	3.7	3.7	7.4	15	6.4	2.8	10	16	5.1	8.0	3.6	4.6	4.0	4.5	2.4	2.5	2.7	21	4.5	6.8	1500	2000					
Selenium	2.0	2.0	1.8	1.9	1.8	1.9	2.0	1.9	1.9	2.0	1.9	1.8	1.9	1.8	1.9	1.8	1.8	2.0	1.9	2.0	1.9	2.0	2.0	2.0	1.9	2.0	390	100						
Silver	0.49	0.50	0.46	0.47	0.46	0.50	0.50	0.48	0.47	0.91	0.47	0.46	0.48	0.60	0.47	0.46	0.47	0.49	0.48	0.49	0.48	0.49	0.49	0.49	0.49	0.48	0.50	390	500					
Thallium	0.98	0.99	0.92	0.94	0.92	0.94	0.99	2.3	0.94	0.99	0.93	0.91	0.95	1.3	2.2	1.7	2.3	0.99	0.97	0.98	0.95	0.98	0.98	0.98	0.97	0.99	0.97	0.78	700					
Vanadium	18	23	48	70	64	24	42	28	25	26	30	27	24	28	25	21	25	35	25	23	25	28	35	31	33	31	40	390	2400					
Zinc	20	23	26	150	52	270	44	150	54	360	420	250	69	210	560	380	420	73	100	210	180	24	21	37	60	110	290	23,000	5000					
METALS (mg/L) by EPA 6010B - Waste Extraction Test																																		
Lead (STLC)	NA	NA	NA	3.3	NA	24	NA	2.6	NA	19	51	7.2	NA	10	14	15	9.2	NA	4.4	38	38	NA	NA	NA	NA	NA	15	NV	5					
Lead (DI WET)	NA	NA	NA	0.050	NA	0.050	NA	0.010	NA	0.010	0.011	0.010	NA	0.027	0.018	0.012	0.014	NA	0.010	0.14	0.013	NA	NA	NA	NA	NA	0.010	0.015 (AL)	NV					
METALS (mg/L) by EPA 1311/6010B - Toxicity Characteristic Leaching Procedure																																		
Lead	NA	NA	NA	0.050	NA	0.050	NA	NA	NA	0.050	0.13	NA	NA	NA	0.15	0.20	0.072	NA	NA	NA	0.95	NA	NA	NA	NA	NA	0.17	NV	5					
PETROLEUM HYDROCARBONS (mg/kg) by EPA 8015M																																		
TVPH - Gasoline (C4-C12)	NA	NA	NA	0.49	NA	NA	0.50	0.49	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.49	0.49	0.49	NV	NV					
TPH - Diesel (C13-C22)	NA	NA	NA	10	NA	NA	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	9.9	NV	NV					
TPH - Motor Oil (C23-C40)	NA	NA	NA	50	NA	NA	50	50	50	50	94	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	NV	NV					
VOLATILE ORGANIC COMPOUNDS (mg/kg) by EPA 8260B																																		
Benzene	NA	NA	NA	0.0049	NA	NA	0.0049	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	1.2	NV					
Ethylbenzene	NA	NA	NA	0.0049	NA	NA	0.0049	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	5.8	NV					
Toluene	NA	NA	NA	0.0049	NA	NA	0.0049	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	4900	NV					
Xylenes, total	NA	NA	NA	0.0049	NA	NA	0.0049	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	0.0050	580	NV					
SEMIVOLATILE ORGANIC COMPOUNDS (mg/kg) by EPA 8270C: None Detected																																		

EXPLANATION

(1) TTL, STLC, and TCLP values as defined in 22 CCR Section 66261.24.

 - Constituent was not detected above Reporting Limit (left justified).

NA - Not Analyzed.

NV - No value with respect to TTL, STLC, or TCLP standards.


- Concentration exceeds the TTL, STLC, or TCLP.

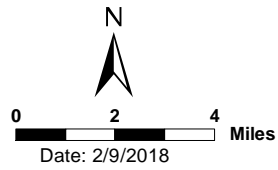
AL - Action Level
 ARAR - Applicable or Relevant and Appropriate Requirements
 STLC - Soluble Threshold Limit Concentration
 TPH - Total Petroleum Hydrocarbons
 TTL - Total Threshold Limit Concentration
 TVPH - Total Volatile Petroleum Hydrocarbons




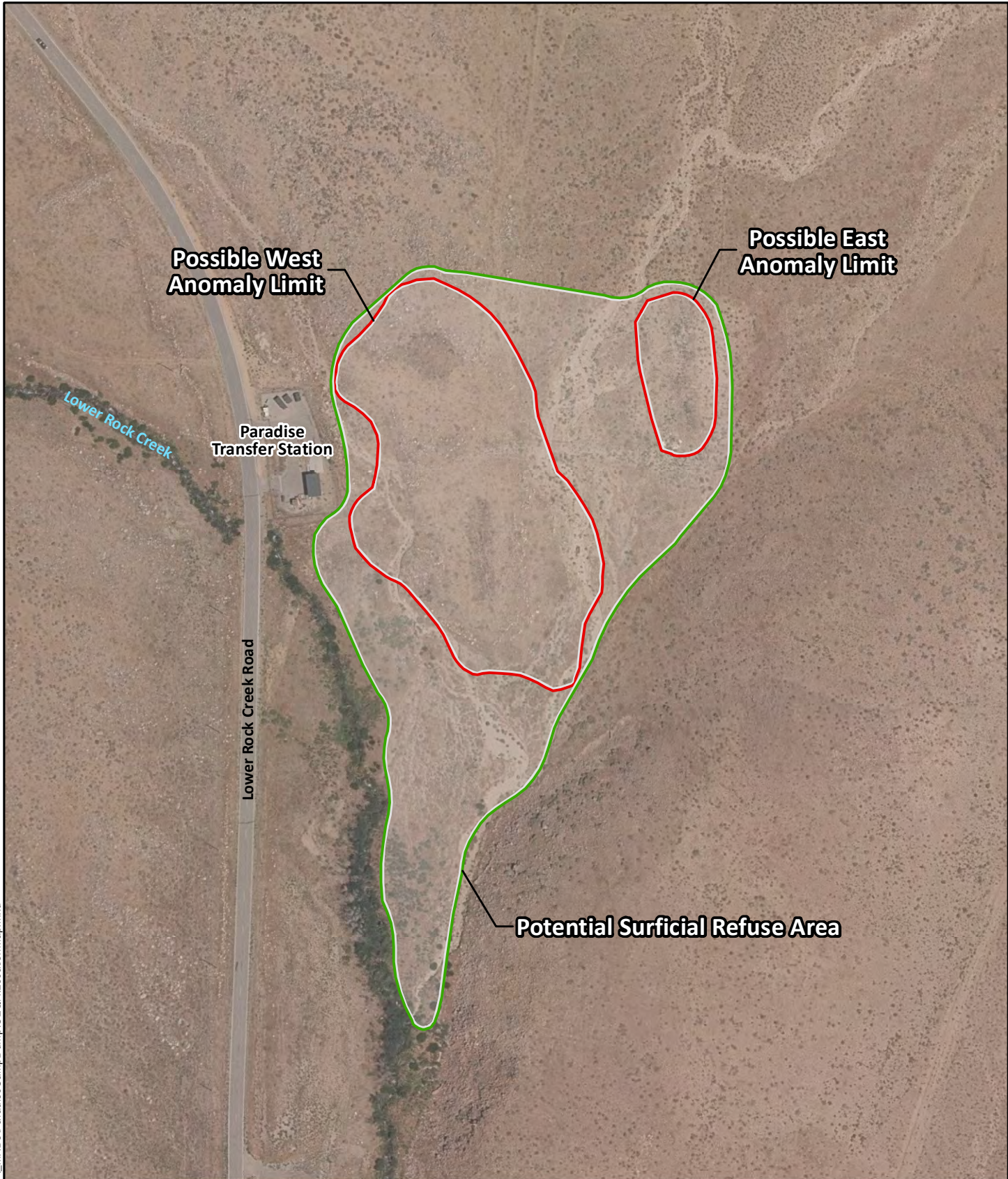
\\usirv1s01\GIS\GIS_Jobs\LADWP\WXDs\ParadiseCampDump\CEQA\VicinityMap.mxd



 Paradise Camp Dump Project Site



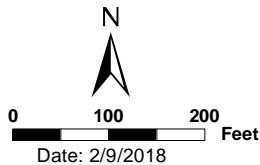
TITLE: Vicinity Map	
PROJECT: LADWP Paradise Camp Pump Remediation Project	
REFERENCE(S): Coordinate System: NAD 1983 UTM Zone 11N	
 Stantec	FIGURE 1



\\usirv1s01\GIS\GIS_Jobs\LADWP\Projects\ParadiseCampDump\CEQA\LocationMap.mxd

- Possible Anomaly Limit
- Potential Surficial Refuse Area

Source: Kleinfelder, 2017



TITLE: Location Map	
PROJECT: LADWP Paradise Camp Pump Remediation Project	
REFERENCE(S): Coordinate System: NAD 1983 UTM Zone 11N	
Stantec	FIGURE 2

1.4 PROJECT DESCRIPTION

1.4.1 Remediation

Based on the 2016 conceptual remediation alternatives evaluation (Geo-Logic Associates, 2017), a Waste Removal and Consolidation Work Plan (Work Plan) was prepared in 2017 for Alternative 2 (Kleinfelder, 2017). Under this alternative, the remediation would remove California hazardous waste from the western anomaly, separate and recycle material, consolidate remaining non-hazardous and non-recyclable material in the western anomaly and debris field, cover the area of consolidation, and increase the cover thickness in the eastern anomaly. The alternative has the following advantages and disadvantages:

Advantages

- Greatly reduces immediate and long-term exposure potential
- Removes known hazardous wastes
- Recycles metal debris
- Adds protection against exposure to burn ash in the eastern area
- Relatively simple construction
- Relatively low maintenance

Disadvantages

- Abundant ground disturbance adjacent throughout the site
- Inhalation hazard during construction
- Uncertainty regarding waste quantity may result in higher costs
- May require Streambed Alteration Agreement or other significant permitting effort
- Higher cost than Option 1

Source: Geo-Logic, 2017

Elements of the remediation effort are:

Excavation and Disposal of Impacted Soil. To address lead contamination, three areas of impacted soil have been delineated for excavation and disposal (**Figure 3**). Initially, vegetation will be removed and mulched for use as erosion control. Then, approximately 350 cubic yards of lead impacted soil classified as California (non-Resource Conservation and Recovery Act [RCRA]) hazardous waste will be excavated. TPH has also been identified as a contaminant of potential concern.

Confirmation Sampling and Analysis. Excavations in the three areas will initially extend to 1 foot below ground surface. The bottom and sidewalls of the excavated area will be screened for lead with an x-ray fluorescence (XRF) analyzer. If lead is present at concentrations exceeding 50 mg/kg (10 times the soluble threshold limit concentration [STLC] of 5 mg/L), excavation will continue. Once the XRF indicates lead levels below 50 mg/kg, confirmation samples will be taken from the bottom and sidewalls of each excavation on 5-foot grids. Sample handling methods are detailed in the Work Plan (Kleinfelder, 2017). Confirmation sample analyses will be compared to the California hazardous waste criteria for inorganic lead (5 mg/L STLC) and 1,000 mg/kg [Total Threshold Limit Concentration (TTLC)] and for TPH. If confirmation samples exceed applicable thresholds, then additional excavation and confirmation sampling will be performed until the California hazardous waste is removed.

Western Anomaly Excavation. Following waste excavation, vegetation will be removed from the remaining portion of the 149,800 square-foot western anomaly and mulched for use as erosion control. This area will be excavated to a depth of 1 foot below grade, or to the depth necessary to remove all visible refuse. A minimum of approximately 5,000 cubic yards of soil are anticipated

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to be excavated. Sampling will be conducted in accordance with the requirements of the receiving facility for the hazardous waste.

Excavation, Screening and Segregation of Recyclable Material. Excavated material will be separated and stockpiled based on three waste categories: 1) soil (to be disposed as a California hazardous waste), 2) recyclable material, and 3) non-recyclable material. Recyclable surficial refuse will be picked up by hand and stored in on-site roll-off bins, pending transport to a recycling facility. Debris that is too large to be picked up by hand will be handled with heavy equipment. An estimated 3,850 cubic yards of material will be screened in the western anomaly. Recyclable materials include: metal, glass, paper, wood, tires, and plastic bottles and containers. Non-recyclable materials include: styrofoam, ceramics, soiled paper, plastic bags, green waste, and material that may contain hazardous contents such as electronic waste. Based on site reconnaissance, the surficial debris appeared to be primarily recyclable metal and glass.

Consolidation of Non-hazardous and Non-recyclable Material. The non-hazardous soil and non-recyclable material will be reconsolidated to the excavation area located in the northern portion of the western anomaly (**Figure 3**).

Backfill and Compaction of Remaining Excavations. Imported soil from designated borrow areas will be used as backfill to bring the excavated area up to existing grade based on the 2016 land survey (Geo-Logic Associates, 2017). Five soil borrow areas on LADWP lands in Inyo County are under review. Soil testing will be completed to confirm the suitability of the soils for use as cover material.

Offsite Transport and Recycling of Recyclable Material. It is anticipated that recyclable materials will be transported to the Bishop-Sunland landfill (Sunland Reservation Road, Unincorporated Inyo County).

Offsite Transport and Disposal of Hazardous Wastes. Based on the in-situ sampling results (**Table 1**), it is anticipated that the excavated soil will be classified as California (non-RCRA) hazardous waste. Potential disposal sites are:

- Kettleman Hills Landfill – Waste Management facility located at 35251 Old Skyline Road, Kettleman City, California 93239
- Buttonwillow Landfill – Clean Harbors facility located at 2500 West Lokern Road, Buttonwillow, California 93206
- US Ecology Nevada Facility - Highway 95, Beatty, Nevada 89003

If allowable by the facilities, existing data will be used for profiling the soils, and stockpiling and additional profiling will not be required. Soil will be directly loaded onto trucks for offsite transport and disposal. However, if additional analysis is required, soils will be stockpiled in a designated area (**Figure 3**), sampled, and analytical results provided to the disposal facility. If the stock pile is used, the following safeguards will be employed:

- Best Management Practices (BMPs) will be employed to protect the stockpile from erosion and run-off. BMPs would include, but not be limited to, placement in an upland location away from the stream so that sediment will not find its way back into the stream, covering the stockpile with plastic sheeting and creating a berm around the perimeter of the stockpile with fiber rolls, and placing the stockpile on plastic sheeting to prevent cross-contamination with the underlying surface.

Installation of Waste Covers. Following waste excavation and consolidation, waste covers will be constructed over the eastern anomaly and western consolidation area to prevent waste exposure to the public; protect the waste from run-off, percolation, and erosion; and to improve site aesthetics. The waste covers will be designed in accordance with CalRecycle-approved alternative cover guidelines (USEPA, 2011). The conceptual waste cover design includes a foundation layer to provide a suitable surface for an overlying earthen waste cover. The earthen waste cover will be designed based on soil properties to minimize percolation and to allow moisture to evaporate from the waste cover. The uppermost layer will be a protective layer consisting of coarse materials for erosion control. Approximately 980 cubic yards of borrow soil would be required to cover the estimated 2,565 cubic yards of consolidated waste in a 115 ft X 115 ft area of the western anomaly to a depth of 2 feet. Approximately 400 cubic yards of borrow soil would be required to cover the eastern disposal area to a depth of 1 foot.

Revegetation. Once remediation is complete and the site is regraded, vegetation would be restored via broadcasting and imprinting a combination of annual and perennial native plant species. Land imprinters are designed to reshape the soil surface to impart roughness and openness with minimal disturbance of plant material and soil structure. The seed mix will include: Indian ricegrass (*Achnatherum hymenoides*), cattle saltbush (*Atriplex polycarpa*), rubber rabbitbrush (*Ericameria nauseosa*), and desert globemallow (*Sphaeralcea ambigua*).

1.4.2 Project Construction

Remediation of the dump site is anticipated to occur over approximately 6 months. Excavation will be scheduled during the dry season and Monday to Saturday during daytime hours to the extent possible. Approximately 10 construction workers would be onsite at any one time. Equipment is anticipated to include:

- Track-mounted excavator – one
- Loaders – two
- Compactor – two
- Hand-tools – may be used to support excavation
- Water Truck – one, to moisten work areas to minimize fugitive dust
- Dump trucks – three, to move excavated materials to off-site recycling and disposal locations

Project Description

Safeguards to be employed during construction will include:

- Temporary traffic control may be used to manage heavy equipment entry and exit onto Rock Creek Road.
- BMPs will be employed to reduce soil track-out onto Lower Rock Creek Road. BMPs will include stabilizing the construction entrance/exit with appropriate aggregate, steel ribbed plates, and street sweeping.
- Trained personnel will be on-site to monitor for petroleum hydrocarbon-derived volatile organic compounds (VOCs) with a photo-ionization detector (PID) to protect worker health and safety.
- Equipment that comes into contact with potentially contaminated soil will be decontaminated via water rinses and steam cleaning.
- Wastewater generated during decontamination will be temporarily stored in properly labeled California Department of Transportation (DOT)-approved steel drums or tanks (BakerCorp or similar tanks) in a designated area on-site. Wastewater will be sampled and analyzed in accordance with the disposal facility's requirements. If determined to be non-hazardous, it is anticipated that wastewater will be disposed at World Oil Recycling in Compton, California.

1.4.3 Project Operations

Once remediated, there are no plans to use the project site for LADWP operations. No form of land development is proposed. Maintenance activities would include site inspections, and maintenance as necessary to ensure cover stability, minimize erosion, and maintain vegetation.

1.5 PLANS AND POLICIES APPLICABLE TO THE REMEDIATION PROJECT

The project site is entirely located on LADWP-owned lands within Mono County. Bureau of Land Management (BLM) land occurs east of the project site. In Mono County, the General Plan and Zoning Code have been combined into one document; the General Plan maps the area as Open Space (OS):

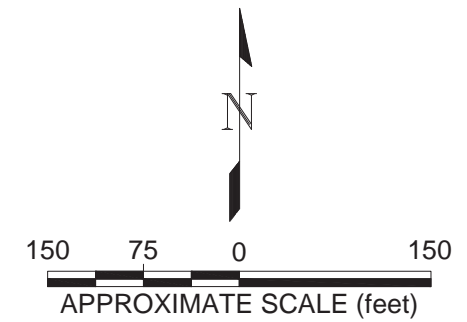
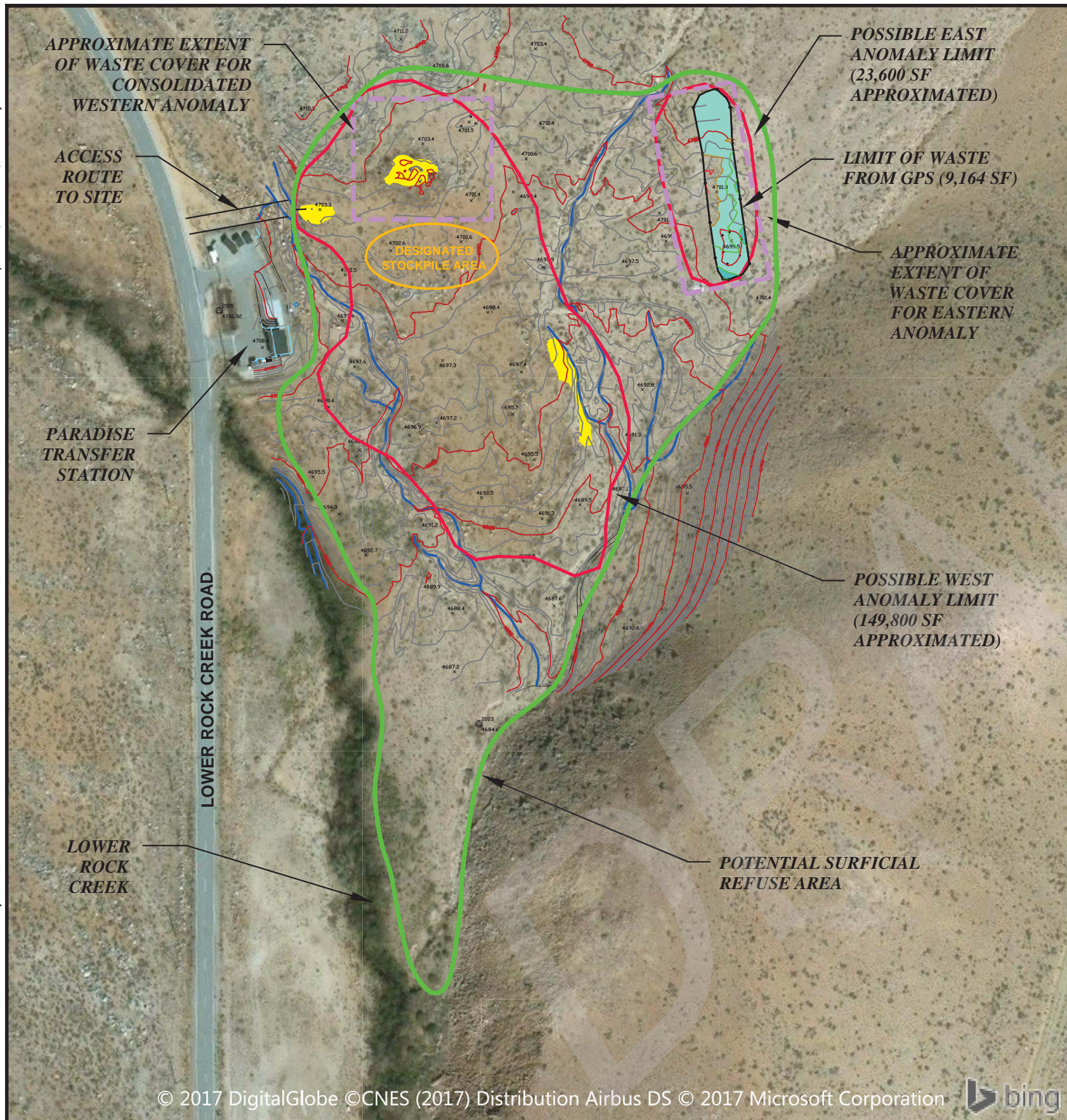
OS - The "OS" designation is intended to protect and retain open space for future generations. These lands may be valuable for resource preservation (e.g., visual open space, botanical habitat, stream environment zones, etc.), low intensity recreational uses, mineral resources, or other reasons.

1.6 PROJECT APPROVALS

Permits, approvals and notifications for the remediation project are anticipated to include:

- Review of the Waste Removal and Consolidation Work Plan and the waste cover design by CalRecycle. The Work Plan was submitted to the Mono County Department of Environmental Health in September 2017. These agencies will be notified prior to the start of field activities.
- To address impacts to jurisdictional waterbodies present onsite, a Clean Water Act Section 404 Permit is being sought from the U.S. Army Corps of Engineers. A water quality certification under Clean Water Act Section 401, and associated Waste Discharge Requirements, is being sought from the Lahontan Regional Water Quality Control Board.
- To address impacts to waterbodies present onsite, a Streambed Alteration Agreement per Section 1602 of the Fish and Game Code is being sought from the California Department of Fish and Wildlife (CDFW).
- Remediation would be completed in compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities. Per the General Permit, a Storm Water Pollution Prevention Plan (SWPPP) incorporating BMPs for erosion and sediment control will be developed and implemented during project construction.
- Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from the California Department of Transportation (Caltrans). Caltrans will also be notified of any work, proposed closures or traffic control on state roadways.
- A temporary State identification number will be sought from the California Department of Toxic Substance Control to dispose of hazardous waste.
- Compliance measures consistent with Great Basin Unified Air Pollution Control District (GBUAPCD) Rule 401 Fugitive Dust will be implemented during construction.
- Post construction, this site will be covered by the Statewide General Industrial Storm Water Permit for closed landfill sites.

ATTACHED IMAGES: Images: LADWP-new.jpg
 ATTACHED XREFS: CAD FILE: U:\Projects\CADD\CADD 2016\20160300\Paradise-Landfill LAYOUT: 2
 PLOTTED: 20 Sep 2017, 11:10am, dfahrney



LEGEND

- 6670 EXISTING 5 FT CONTOUR
- EXISTING 1 FT CONTOUR
- 0 ZERO CUT OR FILL ISOPACH CONTOUR
- 2.5 2.5 FT ISOPACH FILL CONTOUR
- 0.5 0.5 FT ISOPACH FILL CONTOUR
- 2.5 2.5 FT ISOPACH CUT CONTOUR
- 0.5 0.5 FT ISOPACH CUT CONTOUR
- EPHEMERAL TRIBUTARY (ARROYO)
- POTENTIAL SURFICIAL REFUSE AREA
- POSSIBLE ANOMALIES LIMIT (APPROXIMATE)
- APPROXIMATE EXTENT OF WASTE COVER
- 0 FT TO 1 FT ADDITIONAL SOIL OVER EXISTING
- 1 FT TO 2 FT ADDITIONAL SOIL OVER EXISTING
- APPROXIMATE LIMIT OF CALIFORNIA (NON-RCRA) HAZARDOUS WASTE AND ELEVATED LEAD CONCENTRATIONS TO BE EXCAVATED

NOTE: EXISTING TOPOGRAPHY BASED ON AERIAL SURVEY PERFORMED BY COOPER AERIAL SURVEYS CO. ON 12-18-2015.

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REFERENCE: BASE MAP PROVIDED BEY GEO-LOGIC ASSOCIATES, DATED 12/2016

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PROJECT:	20160300.062A
DRAWN:	09/2017
DRAWN BY:	DMF
CHECKED BY:	JL
FILE NAME:	20160300_F2-Paradise.dwg

SITE MAP
WASTE REMOVAL AND CONSOLIDATION WORK PLAN PARADISE CAMP DUMP SITE MONO COUNTY, CALIFORNIA

FIGURE
3

Section 2

Environmental Analysis

2.1 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	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Population and Housing
<input type="checkbox"/> Agricultural Resources	<input type="checkbox"/> Hazards and Hazardous Materials	<input type="checkbox"/> Public Services
<input type="checkbox"/> Air Quality	<input type="checkbox"/> Hydrology and Water Quality	<input type="checkbox"/> Recreation
<input checked="" type="checkbox"/> Biological Resources	<input type="checkbox"/> Land Use and Planning	<input type="checkbox"/> Transportation and Traffic
<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Mineral Resources	<input type="checkbox"/> Utilities and Service Systems
<input type="checkbox"/> Geology and Soils	<input type="checkbox"/> Noise	<input type="checkbox"/> Mandatory Findings of Significance

2.2 AGENCY DETERMINATION

On the basis of this initial evaluation:

- I find that the project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the 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 applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the 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 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 project, nothing further is required.

Signature: Charles C. Holloway Title: Manager, Environmental Assessment & Planning

Printed Name: Charles C. Holloway Date: June 12, 2018

Section 2 – Environmental Analysis

2.3 ENVIRONMENTAL CHECKLIST

2.3.1 Aesthetics

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

Discussion: The Paradise Camp Dump site is located on the eastern slope of the Sierra Nevada Mountains, at elevations ranging from 6,800 to 7,200 feet above sea level. The project area is adjacent to Lower Rock Creek.

a) and c) **Less than Significant Impact.** Existing views of the project site are of the Paradise Transfer Station and the Paradise Camp Dump (**Figure 4**). The site has been previously disturbed during active dumping up to 1973, and subsequently with illegal dumping. The majority of the site is composed of ruderal vegetation consisting of weedy annuals and early seral perennial shrubs. Boulders of granitic and volcanic origin are scattered throughout the site. Two ephemeral washes transverse the site and are tributary to Lower Rock Creek.

U.S. Highway 395 is located approximately 0.7 miles east of the dump site, and is generally 200 to 300 feet higher in elevation than the remediation site. Observers along U.S. 395 may therefore have limited views of the dump site.

Visual Impacts During Construction. Construction activities for the remediation would include soil excavation, grading and potentially the creation of soil stockpiles. Views of the project site during construction would include up to approximately 10 workers and a few pieces of equipment (excavator, loader, compactor, water truck, haul trucks, workers' vehicles).

Visual Impacts During Operation. Once remediation activities are complete, the elevation of the site would be similar to existing conditions. Following waste excavation and consolidation, waste covers will be constructed over the eastern anomaly and western consolidation area in part to improve site aesthetics. With revegetation after remediation, the aesthetics of the site would be similar or improved over existing conditions.

There are no residential homes or permanent residents with views of the project area. Once the project is completed, views of the site from Lower Rock Creek Road would be substantially

Section 2 – Environmental Analysis

the same as existing conditions. The impact would be less than significant on the visual character of the project site.

- b) **Less than Significant Impact.** Scenic roadways are designated by BLM, Inyo National Forest, Caltrans, and the Federal Highway Administration. In Mono County, 101 miles of Hwy 395 are designated as State Scenic Highway – from the Inyo County line to south of the town of Walker. The stated intent of the California Scenic Highway program is to protect and enhance California's natural beauty and to protect the social and economic values provided by the State's scenic resources (Streets and Highway Code Section 260). Highway 395 is an officially designated State Scenic Highway in the project area (Caltrans, 2011). Highway 395 is also listed as part of the Mono County Scenic Highway System (Mono County, 2001). Observers along U.S. 395 may have limited views of the remediation area. Once remediation activities are completed, revegetation efforts would improve site aesthetics. No new permanent structures or major changes in grade are proposed. The temporary impacts of remediation activity on views from a State Scenic Highway would be less than significant.
- d) **Less Than Significant Impact.** No permanent lighting is proposed as part of the project. Remediation activities would primarily occur during daylight hours; some limited use of lighting may be necessary in the early morning or evening hours. There are no plans for a 24-hour construction schedule. Since the proposed lighting would be of limited duration and confined to the specific area of construction, impacts on light that could affect day or nighttime views of the project area would be less than significant. Based on the distance from permanent residences and most drivers, impacts on glare would be less than significant.

Section 2 – Environmental Analysis

Figure 4
View of the Paradise Camp Dump Site
(Site overview, looking northeast from top of hill at site's southern boundary)



Source: Garcia and Associates, 2017

Section 2 – Environmental Analysis

2.3.2 Agricultural and Forest Resources

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

Discussion:

- a) **No Impact.** The Farmland Mapping and Monitoring Program (FMMP) does not include Mono County and there is no farming conducted on the project site. Therefore, the proposed project would have no impact on conversion of FMMP designated Farmland (California Department of Conservation, 2012).
- b) **No Impact.** In Mono County, the General Plan and Zoning Code have been combined into one document. The existing Mono County General Plan designation of the project area is Open Space. Mono County does offer a Williamson Act program (California Department of Conservation, 2013), but the proposed project would have no impact on agricultural zoning or Williamson Act contracts.
- c) and d) **No Impact.** Public Resources Code Section 12220 (g) defines "Forest land" as land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Mono County has no areas designated as timber production zones (California Department of Finance, 2009). The project area is not used for timber harvest and the proposed remediation would not alter existing use of the site. Since the project would not result in conversion of forest land to non-forest use, the project would have no impact on forest lands.

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- e) **No Impact.** The project would not require construction on or adjacent to forest harvest areas or farmlands, or change the use of the project site. Therefore, there would be no impact on agricultural operations from the remediation project.

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2.3.3 Air Quality

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

Mono County is located within the jurisdiction of the GBUAPCD. The Mono Basin has been designated by the State of California and the United States Environmental Protection Agency (EPA) as a moderate non-attainment area for the state and federal 24-hour average particulate matter less than 10 microns (PM₁₀) standards. In 1995, the Mono Basin PM₁₀ State Implementation Plan (SIP) was adopted by the GBUAPCD and the State of California to comply with the requirements of the 1990 federal Clean Air Act (GBUAPCD, 1995). Wind-blown dust from the exposed lake shore of Mono Lake is the predominant source of the PM₁₀ emissions. With the exception of PM₁₀, air quality is considered excellent and the area has been designated as attainment or unclassified for all other ambient air quality standards. Large industrial sources of air pollutants are absent from Mono County.

a) **Less Than Significant Impact.** The relevant air quality plan for the project area is the Mono Basin PM₁₀ SIP (GBUAPCD, 1995). The focus of this planning document is maintenance of specific water level elevations at Mono Lake, the major particulate matter source in the Mono Basin. The SIP demonstrates how the National Ambient Air Quality Standards (NAAQS) will be attained. Remediation of the Paradise Camp Dump site would have no effect on Mono Lake water levels, and dust would be control during excavation and earthwork for the remediation. Therefore, the project is consistent with the applicable air quality plan. Project-related impacts on the air quality plan would be less than significant.

b) and c) **Less Than Significant Impact.** Emissions during project construction would result from the operation of construction equipment including: excavator, loader, compactor, water truck, dump truck and workers’ personal vehicles. **Table 2** summarizes worst-case, peak-day emissions estimates for excavation during remediation.

Section 2 – Environmental Analysis

The GBUAPCD has not established specific quantitative thresholds of significance for air emissions related to construction. However, projects that violate the NAAQS for PM₁₀ are deemed unacceptable.

Construction activities would result in tailpipe emissions of criteria pollutants and dust emissions from earth work and vehicle travel, including travel on unpaved areas. Consistent with GBUAPCD Rule 401 (Fugitive Dust), LADWP would take reasonable precautions to prevent visible particulate matter from being airborne, under normal wind conditions, beyond the property during construction. A water truck would be used during project construction to control dust from active excavation areas, stockpiles and unpaved roadways. With dust control during project construction, emissions would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. Therefore, air pollutant emissions during construction would be less than significant.

Operation of the project would include infrequent travel to the site by LADWP maintenance staff. Tailpipe air pollutant emissions from maintenance vehicles and dust from travel on unpaved roads would be infrequent and minor. Therefore, operations-related air pollutant emissions would be less than significant.

- d) **Less Than Significant Impact.** Sensitive receptors include schools, day-care facilities, nursing homes, and residences. The closest potentially sensitive receptors to the project site are residences located approximately 0.6 miles south and 1 mile northwest of the dump site. As noted above, remediation of the site would include operation of equipment and vehicles. However, given the distance of receptors to the proposed project site, the impact from gas and diesel fumes associated with vehicles and heavy equipment engines would be less than significant.
- e) **Less Than Significant Impact.** Project construction and operation would result in minor localized odors associated with fuel use for equipment and vehicles. These odors are common, not normally considered offensive, and would not be experienced by any residences since none are immediately adjacent to the project site. Odor impacts to potential recreation visitors near the project site during construction activities would be temporary and less than significant.

**Table 2
Summary of Estimated Worst-Case Peak Day Construction Emissions**

Emissions Source	Vehicle Type	No.	Est Max miles per day	Emission Factor (lbs/mi) ¹						Estimated Peak Day Emissions (lbs/day)					
				VOC	CO	NOx	SOx	PM10	PM2.5	VOC	CO	NOx	SOx	PM10	PM2.5
Dump Truck	HHDT	5	500	0.001317	0.006047	0.015264	0.000039	0.000768	0.000624	3.29	15.12	38.16	0.10	1.92	1.56
Water Truck	HHDT	1	2	0.001317	0.006047	0.015264	0.000039	0.000768	0.000624	0.00	0.01	0.03	0.00	0.00	0.00
Workers Personal Vehicles ⁴	PV	10	43	0.000572	0.005029	0.000473	0.000011	0.000095	0.000062	0.25	2.16	0.20	0.00	0.04	0.03
Total															
Emissions Source (construction equipment)	No.	Est Max hrs of use per day	Emissions Factor (lbs/hr) ²						Estimated Peak Day Emissions (lbs/day)						
			VOC	CO	NOx	SOx	PM10	PM2.5 ³	VOC	CO	NOx	SOx	PM10	PM 2.5	
Excavator	1	8	0.0848	0.5160	0.5181	0.0013	0.0249	0.0222	0.68	4.13	4.14	0.01	0.20	0.18	
Loader	2	8	0.0861	0.4470	0.5831	0.0012	0.0300	0.0267	1.38	7.15	9.33	0.02	0.48	0.43	
Roller Compactor	2	8	0.0683	0.3885	0.4485	0.0008	0.0291	0.0259	1.09	6.22	7.18	0.01	0.47	0.41	
Total															
										4.6	23.5	45.6	0.1	2.4	2.0

PV: passenger vehicles, HHDT: heavy-heavy-duty trucks

¹ SCAQMD. 2007a. EMFAC2007 version 2.3 Emission Factors for On-Road Passenger Vehicles & Delivery Trucks. Scenario Year 2018.

² SCAQMD. 2007b. SCAB Fleet Average Emission Factors (Diesel). Scenario year 2018.

³ SCAQMD. 2006. Final –Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance.

⁴ Average mileage per worker assumes 50 percent of workers are from Mammoth Lakes (30 miles away) and 50 percent from Bishop (13 miles away).

Section 2 – Environmental Analysis

2.3.4 Biological Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion: LADWP conducted a biological reconnaissance survey for the project area on April 27, 2017 to identify sensitive species that may occur in the project area and to characterize the baseline biological setting (LADWP, 2017). The survey included native and non-native plant species observations, visual and auditory search for birds and mammals and/or applicable sign, and habitat and community observations.

a) Less Than Significant Impact with Mitigation Incorporated.

Records Search. Known occurrences of special-status species within the Paradise Camp Dump area were identified by searching the California Natural Diversity Database (CNDDDB), CDFW CNDDDB April 2017 Special Animals List, U.S. Fish and Wildlife Service (USFWS) data, and the California Native Plant Society (CNPS) Inventory of Rare and Endangered Vascular Plants of California; and Calflora. The following 7.5 minute USGS quadrangles were considered: Toms Place, Casa Diablo Mountain, Chidago Canyon, Mount Morgan, Rovana, Fish Slough, Mount Tom, Tungsten Hills, and Bishop.

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This review identified 17 special-status wildlife species and 16 special-status plant species that may occur in the project area (Tables 3 and 4). Extensive review was then conducted to determine habitat suitability for each species. The potential for the project to impact special-status species was then assigned to one of four categories: Unlikely, Low, Medium, or High. Factors taken into consideration included: previously recorded occurrences, on-site vegetation and habitat quality, topography, elevation, soils, surrounding land uses, habitat preferences, geographic ranges, Watershed Resources Staff reports, monitoring data, and local expert knowledge. The Probability for Occurrence categories are defined as follows:

- **Unlikely:** The project area and/or immediate vicinity do not support suitable habitat for a particular species, and therefore the project is unlikely to impact this species.
- **Low:** The project area and/or immediate vicinity only provide limited habitat for a particular species. In addition, the known range for a particular species may be outside of the immediate project area. No direct impacts from the project will occur but there could be potential indirect impacts.
- **Medium:** The project area and/or immediate vicinity provide suitable habitat for a particular species, and project activities may directly or indirectly impact this species.
- **High:** The project area and/or immediate vicinity provide ideal habitat conditions for a particular species and/or known populations occur in the immediate area. Project activities may directly impact this species.

**Table 3
Special-Status Wildlife with Potential to Occur within the Project Area**

Species	Common Name	Status	Probability of Occurrence
Fishes			
<i>Catostomus fumeiventris</i>	Owens Sucker	SSC	Unlikely
<i>Cyprinodon radiosus</i>	Owens Pupfish	FE; SE; FP	Unlikely
<i>Rhinichthys osculus ssp.2</i>	Owens Speckled Dace	SSC	Unlikely
<i>Siphateles bicolor snyderi</i>	Owens Tui Chub	FE; SE; FP	Unlikely
Amphibian			
<i>Lithobates pipiens</i>	Northern Leopard Frog	SSC	Low
Birds			
<i>Aquila chrysaetos</i>	Golden Eagle	FP	Medium
<i>Buteo swainsoni</i>	Swainson's Hawk	ST	Medium
<i>Empidonax traillii extimus</i>	Southwestern Willow Flycatcher	FE; SE	Unlikely
<i>Falco mexicanus</i>	Prairie Falcon	WL	Medium
<i>Riparia</i>	Bank Swallow	ST	Unlikely

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Species	Common Name	Status	Probability of Occurrence
Mammals			
<i>Antrozous pallidus</i>	Pallid Bat	SSC	Medium
<i>Corynorhinus townsendii</i>	Townsend's Big-Eared Bat	SSC; SC	Medium
<i>Euderma maculatum</i>	Spotted Bat	SSC	Medium
<i>Lepus townsendii</i>	Western White-Tailed Jackrabbit	SSC	Low
<i>Aplodontia rufa californica</i>	Sierra Nevada Mountain Beaver	SSC	Unlikely
<i>Microtus californicus vallicola</i>	Owens Valley Vole	SSC	Unlikely
<i>Vulpes necator</i>	Sierra Nevada red fox	FC;ST	Low

Definitions:

Federal status: USFWS Listing

FE = Listed as endangered under federal Endangered Species Act (ESA)
 FC = Candidate for listing (threatened or endangered)

State status: CDFW Listing

SE = Listed as endangered under the California Endangered Species Act (CESA)
 ST = Listed as threatened under the CESA
 SC = Candidate for listing (threatened or endangered) under CESA
 SSC = Species of Special Concern as identified by the CDFW
 WL = Watch list species as identified by CDFW
 FP = Listed as fully protected under CDFW code

A query of the CNDDDB and CNPS databases found 16 special-status plant species within a nine quad search surrounding the project area (**Table 4**). The potential for special-status plant species to occur is based on proximity to previously recorded occurrences, onsite vegetation and habitat quality, topography, elevation, soils, surrounding land uses, habitat preferences, and geographic ranges.

Table 4
Special-Status Plants with Potential to Occur within the Project Area

Scientific Name	Common Name	Status	Potential for Impact
<i>Astragalus argophyllus</i> var. <i>argophyllus</i>	silver-leaved milk-vetch	2B.2	unlikely
<i>Astragalus lentiginosus</i> var. <i>piscinensis</i>	Fish Slough milk-vetch	1B.1; FT	unlikely
<i>Calochortus excavatus</i>	Inyo County star-tulip	1B.1	unlikely
<i>Chaetadelpha wheeleri</i>	Wheeler's dune-broom	2B.2	low
<i>Crepis runcinata</i>	fiddleleaf hawksbeard	2B.2	unlikely
<i>Elymus salina</i>	Salina Pass wild-rye	2B.3	unlikely
<i>Fimbristylis thermalis</i>	hot springs fimbristylis	2B.2	unlikely
<i>Ivesia kingii</i> var. <i>kingii</i>	alkali ivesia	2B.2	unlikely
<i>Mentzelia torreyi</i>	Torrey's blazing star	2B.2	low
<i>Oryctes nevadensis</i>	Nevada oryctes	2B.1	unlikely
<i>Phacelia inyoensis</i>	Inyo phacelia	1B.2	low
<i>Plagiobothrys parishii</i>	Parsih's popcornflower	1B.1	unlikely

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Scientific Name	Common Name	Status	Potential for Impact
<i>Ranunculus hydrocharoides</i>	frog's-bit buttercup	2B.1	unlikely
<i>Sarcobatus baileyi</i>	Bailey's greasewood	2B.3	unlikely
<i>Sidalcea covillei</i>	Owens Valley checkerbloom	1B.1; SE	unlikely
<i>Thelypodium milleflorum</i>	many-flowered thelypodium	2B.2	unlikely

Definitions:

Federal status: USFWS Listing

FT = Listed as threatened under ESA

State status: CDFW Listing

SE = Listed as endangered under the CESA

CNPS Status

1B = rare, threatened or endangered in California and elsewhere

2B = rare, threatened or endangered in California but more common elsewhere

0.1 = seriously threatened in California

0.2 = Moderately threatened in California

0.3 = Not very threatened in California

Sensitive Plant Species. Rare plants were not observed during the 2017 field surveys for the project and none are considered highly likely to be present. Since there is no suitable habitat present onsite for any of the sensitive species identified above, project-related impacts on rare plants would be less than significant. A full plant list is included as Appendix C of LADWP, 2017.

Sensitive Amphibian Species. Since onsite habitat is unsuitable, special status amphibians are not likely to be present in the project area.

Sensitive Bird Species. No suitable nesting or roosting habitat was present for any of the special status bird species noted above. Prairie Falcon and Golden Eagle are expected to fly over the project area and potentially be within the project vicinity. In the project area, Golden Eagle is a regularly occurring breeding species with potential nest sites, such as the Owens River Gorge or canyons in high altitude locations. Swainson's Hawk is a regular breeding species in the project area, in trees along manmade and natural waterways, particularly those near alfalfa fields. No Prairie Falcons, Golden Eagles or Swainson's Hawks were observed during the April survey. No special status birds would be directly impacted by the project. However, indirect impacts to foraging birds could occur. Additionally, nests of all native birds are protected under the Migratory Bird Treaty Act and California Fish and Game Code. With implementation of a pre-construction survey for active bird nests (Mitigation Measure **BIO-1**), project-related impacts on sensitive avian species would be less than significant.

Sensitive Fish Species. No special-status fish species are present within the reach of Lower Rock Creek adjacent to the project site, therefore no impacts on sensitive fishes would occur.

Sensitive Mammal Species. No special-status mammals or their habitat were observed during the April 2017 survey. Since suitable roosting or nesting habitat is not present, it is unlikely that special status mammals, including bats, would be directly impacted by the project. However, indirect impacts to foraging bats could occur. Foraging habitat for Pallid Bat, Townsend's Big-Eared Bat, and Spotted Bat occurs in the surrounding project area, and roosting habitat may occur adjacent to the work areas. Therefore, a preconstruction survey for sensitive bats will be conducted

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prior to the start of ground disturbing activities (mitigation measure **BIO-1**). As mitigated, temporary indirect impacts would be less than significant.

Impacts Related to Invasive Species. A list of weeds in the area was developed during the site visit and is contained as Appendix B: Noxious Weed Assessment of LADWP, 2017. Prickly Russian thistle (*Salsola tragus*) is the only weed species observed at the site that is considered noxious by the State of California (CDFA, 2003). Russian thistle occurs at the project site, along roadsides, and adjacent disturbed areas. Construction activities for the remediation effort will take place within a currently disturbed area, however, soil disturbance could render the area vulnerable to colonization by invasive plant species, which could reduce the availability of suitable habitat for native plants through competition. Additionally, construction equipment used at the project site has the potential to transport invasive aquatic species (e.g., quagga and zebra mussels) to onsite waterways. With implementation of an invasive species prevention plan (Mitigation Measure **BIO-2**), impacts related to invasive species would be less than significant.

Summary of Impacts to Sensitive Species. Since none are present, direct impacts to sensitive species are not anticipated. However, implementation of mitigation measures **BIO-1** and **BIO-2** during project construction would reduce indirect impacts to sensitive species to a less than significant level. Mitigation Measure **BIO-3** would further reduce project-related impacts on biological resources.

b) and c) **Less Than Significant Impact.** No remediation activities are proposed directly in Lower Rock Creek, however, the project area contains two ephemeral washes that drain to Lower Rock Creek and that could potentially fall under federal jurisdiction (Clean Water Act Section 404 administered by the U.S. Army Corps of Engineers) as areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support wetland vegetation. The excavations located along the channels on the east and west sides of the western anomaly will extend until all buried refuse and associated lead-impacted soil in the immediate vicinity is removed. This will eliminate the need to cover these erosion-prone areas.

Since site disturbance would exceed 1 acre, during construction, stormwater would be managed in accordance with BMPs identified in a SWPPP completed in compliance with the NPDES General Permit for Storm Water Discharges Associated with Construction Activity (General Permit). With implementation of the required SWPPP, potential increases of sediment load in stormwater would result in a less than significant impact to onsite and offsite surface waters.

As of June, 2018, LADWP is coordinating with relevant regulatory agencies regarding impacts to ephemeral washes. With removal of contaminated soils and debris from the site, the impact of the project on riparian habitat, wetlands, or other sensitive natural communities would be beneficial and less than significant.

d) **Less Than Significant Impact with Mitigation Incorporated.** There are no known migration corridors for terrestrial species within the project area. Since impacts to nesting avian species from remediation activities would be mitigated to less than significant levels

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(Mitigation Measure **BIO-1**), the impact of construction on wildlife migration corridors and nursery sites would be less than significant.

- e) **Less Than Significant Impact.** No tree ordinances apply to the project area. The Mono Basin Community Plan (2012) calls for the preservation of the area’s natural values while providing diverse recreational and outdoor activities. Since mitigation measures have been identified for the protection of sensitive species and habitat, the project would not conflict with these goals. Therefore, the impact on local policies or ordinances protecting biological resources would be less than significant.
- f) **Less Than Significant Impact with Mitigation Incorporated.** The project site is not within a Significant Natural Area (SNA) as determined by CDFW. LADWP prepared a Habitat Conservation Plan (HCP) for LADWP-owned lands in Inyo and Mono Counties (LADWP, 2015). The seven species covered under this HCP are Owens pupfish (*Cyprindon radiosus*), Owens tui chub (*Siphateles bicolor snyderi*), Owens/Long Valley speckled dace (*Rhinichthys osculus* spp.), bi-state population of Greater Sage-Grouse (*Centrocercus urophasinus*), Yellow-billed Cuckoo (*Coccyzus americanus*), Willow Flycatcher (*Empidonax traillii*), and Bell’s Vireo (*Vireo bellii*). Of these species, the Willow Flycatcher is the only species known for the general project area, however, it is unlikely to occur onsite. With implementation of the mitigation measures described below, and applicable measures outlined in the HCP, impacts on habitat conservation planning would be less than significant.

Mitigation Measures for Impacts to Biological Resources

To reduce impacts to biological resources to a less than significant level, the following mitigation measures shall be implemented.

BIO-1. Conduct Pre-Construction Survey. Construction activities shall be conducted outside the avian nesting season to the extent feasible. For all construction-related activities that take place within the nesting season (March 15 through August 31), a preconstruction nesting-bird survey shall be conducted no more than 7 days prior to project initiation within the project area and a 300-foot buffer. The pre-construction survey for nesting birds shall be conducted in the remediation area, the proposed soil stockpile locations, and staging areas. If active nests are found for listed or non-listed species, a no-disturbance buffer zone shall be established around them according to the biologist’s assessment of the species’ sensitivity to disturbance, generally 300 feet for smaller birds and 500 feet for raptors. Within this buffer zone, no construction shall take place until August 31, until the biologist determines that the nest is no longer active, or unless an alternative method of avoidance is prepared by the biologist and approved by the relevant resource agencies. The preconstruction survey shall include observations to determine if roosting bats are present adjacent to the project site. If observed, avoidance measures shall be defined by the project biologist.

BIO-2. Invasive Species Prevention. Construction personnel shall wash the tires and tracks of earth-moving, grading, and excavation equipment before entering the site, to prevent inadvertent introduction and spread of noxious weeds. It is anticipated that the above-referenced equipment would remain onsite throughout the duration of the project, either in construction areas or in staging/parking/laydown areas. Workers’ cars and trucks and other light duty vehicles used to

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access the project area each day and delivery vehicles are not included in this measure.

Only vehicles and equipment that have been inspected for, and declared free of, invasive aquatic invertebrates shall be allowed on the project site.

BIO-3. Conduct Pre-construction Educational Tailgate Session. A qualified biologist shall provide environmental awareness training to all construction personnel before construction begins. The training shall include species descriptions and review of mitigation and protection measures.

With implementation of the above mitigation measures, project-related impacts on biological resources would be less than significant.

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2.3.5 Cultural Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion: A cultural resources assessment for the Paradise Camp Dump site was conducted by Garcia and Associates (GANDA, 2017); results are summarized below. To protect historic resources present at the project site, the cultural resources report is on file with LADWP but is not appended to the Initial Study. The confidentiality of records and information pertaining to the location, character, or ownership of archaeological sites and historic properties will be maintained consistent with National Historic Preservation Act (NHPA) Section 304, Archeological Resources Protection Act (ARPA) Section 9, and California Government Code 6254.10, as applicable.

Records Searches. Records searches were conducted at the Eastern Information Center (EIC) at the University of California, Riverside, on May 31, 2017. The records searches encompassed the entire project area plus a 0.5-mile buffer. The following sources were consulted:

- EIC base maps: USGS series topographic quadrangles.
- Pertinent survey reports and archaeological site records were examined to identify recorded archaeological sites and historic-period built-environment resources (such as buildings, structures, and objects) within or immediately adjacent to the project area.
- The California Department of Parks and Recreation’s California Inventory of Historic Resources (1976) and the Office of Historic Preservation’s Historic Properties Directory (2007), which combines cultural resources listed on the California Historical Landmarks, California Points of Historic Interest, and those listed in or determined eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR).
- Historical maps and historical aerial photographs of the area.

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The record search revealed that two cultural resources studies have previously been conducted within 0.5 miles of the site. These studies, both conducted in 1974, addressed a portion of Lower Rock Creek Road south of the Inyo/Mono County line, approximately 0.25 miles south of the project area. Two archaeological sites have been previously recorded within 0.5 miles of the site. Both resources are prehistoric in age and are located more than 1,000 feet from the project site.

Native American Consultation. On November 8, 2017, the Native American Heritage Commission (NAHC) was requested to conduct a search of their Sacred Lands File for the presence of Native American sacred sites or human remains in the vicinity of the proposed project. A written response received from the NAHC on December 5, 2018, stated that the Sacred Lands File failed to indicate the presence of Native American cultural resources in the immediate project area.

On the recommendation of NAHC, and in compliance with Assembly Bill (AB) 52, emails and letters were sent on January 29, 2018 to 10 Native American contacts classified by NAHC as potential sources of information related to cultural resources in the vicinity of the project area. The letters advised the tribes and specific individuals of the proposed project and requested information regarding cultural resources in the immediate area, as well as feedback or concerns related to the proposed project.

To date, LADWP received one request for consultation from the Bishop Paiute Tribe. On March 13, 2018, LADWP staff met with the Bishop Paiute Tribe's Tribal Historic Preservation Officer (THPO) to discuss project details and potential impacts to cultural resources.

Pedestrian Survey. Archaeologists conducted an intensive pedestrian survey of the area of potential impacts on June 20 and 21, 2017, and subsurface testing was conducted from August 3 to August 7, 2017. The survey consisted of a pedestrian walk-over of the entire project site in parallel transects spaced at 10-meter intervals. All artifact concentrations, cultural features, and a selection of diagnostic artifacts were mapped using a sub-meter accurate GPS unit. Diagnostic historic artifacts, all prehistoric artifacts, and all features were photographed and analyzed in place. No historic or prehistoric artifacts were collected from the site's surface. The entire survey was photo-documented with representative overview photographs of the property and all artifact concentrations.

Three types of test excavations, including shovel scrapes, shovel test probes, and controlled excavation units, were used during the evaluation. Due to the high volume of historical debris present throughout the site, only diagnostic historical artifacts were collected and analyzed in the laboratory. All prehistoric artifacts encountered during excavations were recovered.

CRHR Eligibility. The CRHR is an authoritative guide in California, to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change (PRC Section 5024.1[a]). For a resource to be eligible for the CRHR, a property must be significant at the local, state, or national level, under one or more of the following criteria:

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- Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- Criterion 2: It is associated with the lives of persons important in our past.
- Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.
- Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.

Resources nominated to the CRHR must retain enough integrity of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance.

- a) b) and e) **Less than Significant Impact with Mitigation Incorporated.** Mainly historical in age, the Paradise Camp Dump site includes an extensive scatter of domestic and industrial debris. Additionally, a locus of prehistoric materials is present. An intensive pedestrian survey and test excavations were conducted to determine if surface and subsurface deposits have sufficient diversity and integrity to make the site eligible for listing in the CRHR, as well as to make recommendations related to the management of significant cultural resources during project implementation.

The results of the investigation show that the site’s historic component is dominated by fragmented food containers and liquor bottles, ceramic fragments that largely represent commercial restaurant ware, and burned and unburned animal bones, many of which are butchered cow bone. Personal, industrial, and structural materials are also present, but in relatively small amounts. Further, the majority of subsurface artifacts appear to date to a fairly narrow time period of the late 1930s through the late 1950s. These findings support the hypothesis that while the dump was clearly used by other local residents in the past, a large proportion of the artifacts represent refuse associated with operation of the Paradise Camp and Lodge.

While the historic component appears to satisfy CRHR Criterion 1 by demonstrating a relationship between the dump and the Paradise Lodge, the deposits have been severely disturbed, and therefore lack the stratigraphic integrity and artifact diversity that would be necessary to explore changes in the demographics and behaviors of the resort’s staff and guests over time. Given the lack of integrity of both setting and materials, the historic component of the Paradise Camp Dump is recommended ineligible for inclusion in the CRHR. No avoidance, further archaeological study, or mitigation of impacts is recommended for the historic component prior to or during implementation of the proposed project.

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In contrast, the Paradise Camp Dump's prehistoric component is diverse and appears to have retained much of its integrity. The survey and test excavation found a wide range of artifact classes with sufficient diversity to provide valuable scientific evidence related to chronology and culture history, subsistence and settlement strategies, and trade. As such, it satisfies Criterion 4 by having the potential to yield information important in history or prehistory. The prehistoric component of the Paradise Camp Dump is recommended eligible for inclusion in the CRHR.

The proposed project would require excavation for remediation and site disturbance for collection of recyclables and non-recyclables in the debris field. These actions have the potential to dislodge, relocate, crush, and otherwise cause substantial adverse changes to cultural resources potentially eligible for listing in the CRHR. Avoidance of the prehistoric component during ground-disturbing activities is not feasible, since remediation of the site and removal of the wastes is required per CalRecycle and Mono County requirements. Therefore, mitigation measure **CUL-1** has been defined to mitigate potential significant impacts through the retrieval of scientifically valuable data. As mitigated by implementation of measures **CUL-1** to **CUL-4**, the impact of the proposed project on cultural resources would be less than significant.

CUL-1. Data Recovery for Prehistoric Component. A data recovery program for the prehistoric component (concentration AC-7) shall be developed and implemented. Before implementation, the Bishop Paiute Tribe will have the opportunity to review and provide input on the data recovery plan. The program shall include:

Research Design. A comprehensive research design shall be developed to address research themes on a broad regional level and to provide a procedural framework for the collection of data. The plan will provide specific details regarding how the archaeological field work will be carried out to ensure that a sufficient sample of scientific data from the prehistoric locus is collected and analyzed. The plan will also present a focused set of prehistoric research questions and data requirements that will guide the field and laboratory analyses. Native American consultation shall be conducted prior to finalization of the research design.

Fieldwork. Data recovery fieldwork shall consist of a combination of surface mapping, surface collection, and controlled excavations. Fieldwork shall be limited to the portions of the prehistoric locus within the area of proposed ground disturbance (i.e., the Western Anomaly).

All prehistoric surface artifacts not recovered during the testing and evaluation phase shall be mapped and collected for analysis in the laboratory. Hand-dug excavations, including 50 by 100 cm, 100 by 100 cm, and larger block excavation units, shall be systematically conducted in order to retrieve a statistically valid sample of subsurface data. All excavations shall be in vertically controlled levels within a horizontally controlled, site-wide Cartesian grid.

All field activity shall be fully documented with standardized sketches of soil profiles; photographs of soil profiles, excavation units, and site-wide overviews; and standard archaeological forms that document all excavation activity and artifact provenience. All artifacts shall be properly stabilized

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in the field, placed in bags, and labeled to include all provenience data. Following the fieldwork, all artifacts and field records shall be transported to a laboratory for analysis.

Laboratory Analysis. All materials recovered during fieldwork shall be processed in sequential order (by unit or feature, and level from top to bottom) and by complexity of category (artifacts, to ecofacts, to bulk samples). All tools shall receive an individual catalog designation, whereas debitage, faunal remains, flora, etc., shall be assigned a group or lot number.

Catalog data shall be entered into a computer using Microsoft Access or a similar database management package with the capacity to sort, count, and organize individual catalog entries. A final version of the catalog shall be included in the Archaeological Data Recovery Report.

Special studies will be conducted on obsidian, organic material, and bone to provide dates and additional scientific data. These studies include radiocarbon dating of organic material (e.g., charcoal, wood, and bone), obsidian hydration dating and source determination, and analysis of faunal remains. Approximately the following number of samples shall be submitted for each special study:

- Radiocarbon dating: 8 samples
- Obsidian hydration dating: 30 samples
- Obsidian source determination: 30 samples
- Faunal analysis: 200 samples

Reporting. An Archaeological Data Recovery Report shall be prepared upon completion of the records search, Native American outreach, and field survey. The report shall conform to the California Office of Historic Preservation's Archaeological Resource Management Reports (ARMR) standards, and shall include the results and interpretations of the data recovery field and laboratory work. The finalized report shall be filed at the Eastern Information Center at the University of California, Riverside.

CUL-2. Monitoring Program. During all ground-disturbing activities within 200 feet of the boundary of AC-7, a qualified archaeological monitor shall be present. The monitor shall be authorized to halt construction, if necessary, in the immediate area where cultural resources are encountered. The monitor shall maintain a daily monitoring log which describes monitoring activities and results. Tribal representatives that have participated in Native American consultation for the project shall be contacted prior to the start of project construction. Qualified Native American monitors shall be afforded an opportunity to be present during earthwork and excavation activities within 200 feet of the boundary of AC-7.

CUL-3. Previously Unrecorded Cultural Resources. If previously unrecorded cultural resources are encountered during project construction, all work shall cease within 100 feet of the discovery until the find can be evaluated by a qualified archaeologist. Work shall not resume until the discovery has been evaluated and the recommendations of a qualified archaeologist have been implemented.

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CUL-4. Cultural Resources Training. All remediation workers and supervisors shall attend a mandatory workshop providing information on monitor roles, responsibilities, and authority; restricted areas and approved vehicle corridors; the types of artifacts that may be encountered; penalties for unauthorized collection of artifacts; and the need to temporarily redirect work away from the location of any unanticipated discovery until it is recorded and adequately documented and treated.

- c) **Less than Significant Impact with Mitigation Incorporated.** The project area is located on the eastern slope of the Sierra Nevada Mountains. The geologic formations underlying the dump site consist of Pleistocene-age glacial till. An online fossil locality search was conducted on February 13, 2018 using the Berkeley Natural History Museum (BNHM), University of California Museum of Paleontology (UCMP) online database. Based on the database inquiry, no paleontological resources have been previously recorded for the project area and none were observed during the archaeological survey of the project area. Since the site has been extensively disturbed during its use as a solid waste disposal facility, the potential for disturbance to intact fossils is low. However, project-related excavation into native soils has the potential to disturb soils containing paleontological resources. If significant fossils are present and not recovered or avoided, destruction during construction would be a significant impact. Therefore, mitigation measure **CUL-5** shall be implemented to protect paleontological resources from disturbance during remediation. With implementation of mitigation, impacts on paleontological resources would be less than significant.

CUL-5. Protection of Discovered Paleontological Resources. Recorded paleontological resources in Mono County are known for Trench Canyon, Deep Wells Road, Banner Springs, and Mt. Baldwin Limestone (BNHM, 2018). Paleontological resources have not been previously recorded at the Paradise Camp Dump site. Since remediation activities have limited potential to disturb native sediments, disturbance of significant paleontological resources is not likely. However, if remediation workers or the archaeological monitor identifies paleontological materials that cannot be avoided, all construction work within a 100-foot radius of the find shall be halted until a qualified paleontologist or paleontologically-trained archaeologist can assess the significance of the find.

If the discovery is significant or potentially significant, then the following shall apply: data recovery and analysis, preparation of a data recovery report, and accession of recovered fossil material at an accredited paleontological repository (e.g., the University of California's Museum of Paleontology). Significant vertebrate fossils shall be recovered. A representative sample of significant invertebrate and plant fossils shall be recovered.

- d) **Less than Significant Impact with Mitigation Incorporated.** Based on a review of the available historic maps for the area, no recorded cemeteries are located within the proposed project area. Human remains were not found in the course of the 2017 pedestrian surveys of the project area. In the unexpected event that human remains are discovered during project construction or operation, the Mono County Coroner would be contacted, the area of the find would be protected, and provisions of State CEQA Guidelines Section 15064.5 and Public Resources Code 5097 would be followed. With implementation of mitigation measure **CUL-6**, project-related impacts on human remains potentially present in the project area would be less than significant.

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CUL-6. Human Remains. In the unexpected event that human remains are discovered, the Mono County Coroner shall be contacted, the area of the find shall be protected, and provisions of State CEQA Guidelines Section 15064.5 and Public Resources Code 5097 shall be followed.

With implementation of the above mitigation measures, project-related impacts on cultural resources would be less than significant.

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2.3.6 Geology and Soils

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems, where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a)-i) and a)-ii) **Less Than Significant Impact.** The project site is located within the Basin and Range Geomorphic Province of California, characterized by sub-parallel, normal fault-bounded mountain ranges and valleys (horsts and grabens). Located within one of these down-dropped basins (Upper Owens Valley), the site is bounded by the Sierra Nevada Mountain Range to the west and the White Mountain Range to the east. The dump site overlies Quaternary alluvial deposits derived from the Sierra Nevada batholith and the Bishop Tuff. Boulders of granitic and volcanic origin are scattered in the project area. Ground surface elevation ranges from approximately 4,700 (in the north) to 4,685 feet above mean sea level (in the south).

Surface rupture and seismic ground shaking are possible for the project site and surrounding region. However, the remediation area has not been mapped as part of the Alquist-Priolo Earthquake Fault Zoning Act (CDC, 1985). Since habitable or other structures would not be built as part of the proposed project, people would not be exposed to adverse effects involving

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seismic ground shaking. Therefore, impacts related to seismic events would be less than significant.

- a)-iii) **Less Than Significant Impact.** Since habitable structures would not be built as part of the proposed project, people would not be exposed to adverse effects involving seismic-related ground failure. Therefore, impacts related to ground failure would be less than significant.

- a)-iv) **Less Than Significant Impact.** The project site is located well away from the mountain front, which has slopes steep enough to initiate a landslide during an earthquake. Additionally, since habitable structures would not be built as part of the proposed project, people would not be exposed to adverse effects involving landslides. Therefore, impacts related to landslides would be less than significant.

- b) **Less Than Significant Impact.** There are two soil types within the Paradise Camp Dump site; Honova very cobbly loamy sand (Map Unit 218) and Ulymeyer gravelly loamy coarse sand (Map Unit 335) (LADWP, 2017). Cajon loamy sand and Cajon gravelly loamy sand are alluvium derived from granite. These soil types occur on fan terraces and alluvial fans with 0 to 15 percent slopes from 3,600 to 4,300 feet. These soils are deep, well drained, and have medium surface runoff (USDA, 2010).

Remediation efforts at the site would include excavation and grading of soils. With implementation of stormwater controls during construction, and use of a water truck to moisten surface soils and limit wind erosion, impacts on soil erosion would be less than significant.

- c) and d) **Less Than Significant Impact.** Habitable structures would not be built as part of the proposed project. Impacts related to unstable or expansive soils, if any are present on the project site, would be less than significant.

- e) **No Impact.** Septic systems are not present or proposed for the project site. Therefore, there would be no impact on soils related to wastewater disposal.

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2.3.7 Greenhouse Gas Emissions

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

Discussion: Greenhouse gases (GHGs) are gases that trap heat in the atmosphere. The most common GHGs emitted from natural processes and human activities include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Examples of GHGs created and emitted primarily through human activities include fluorinated gases (hydrofluorocarbons and perfluorocarbons) and sulfur hexafluoride. Each GHG is assigned a global warming potential. The global warming potential is the ability of a gas or aerosol to trap heat in the atmosphere. The global warming potential rating system is standardized to CO₂, which has a value of one. For example, CH₄ has a global warming potential of 21, which means that it has a global warming effect 21 times greater than CO₂ on an equal-mass basis. Total GHG emissions from a source are often reported as a CO₂ equivalent (CO₂e). The CO₂e is calculated by multiplying the emission of each GHG by its global warming potential and adding the results together to produce a single, combined emission rate representing all GHGs. On a national scale, federal agencies are addressing emissions of GHGs by reductions mandated in federal laws and Executive Orders. Several states have promulgated laws as a means to reduce statewide levels of GHG emissions. In particular, the California Global Warming Solutions Act of 2006 directs the State of California to reduce statewide GHG emissions to 1990 levels by the year 2020.

AB 32, California Global Warming Solutions Act of 2006, was signed into law on September 27, 2006. AB 32 requires the California Air Resources Board (CARB), in coordination with other State agencies and members of the private and academic communities, to adopt regulations to require the reporting and verification of statewide greenhouse gas emissions and to monitor and enforce compliance with this program. Under the provisions of the bill, by 2020, statewide greenhouse gas emissions would be limited to the equivalent emission levels in 1990. On December 12, 2008, CARB adopted its Climate Change Scoping Plan pursuant to AB 32 (CARB, 2008). The Scoping Plan was re-approved by CARB on August 24, 2011. The scoping plan indicates how these emission reductions will be achieved from significant greenhouse gas sources via regulations, market mechanisms and other actions.

The potential effects of proposed GHG emissions are by nature global, and have cumulative impacts. As individual sources, project GHG emissions are not large enough to have an appreciable

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effect on climate change. Therefore, the impact of proposed GHG emissions to climate change is discussed in the context of cumulative impacts.

As a power utility, the majority of LADWP's GHG emissions results from power generation. Other GHG emissions are a result of vehicle and equipment use for construction and operation of LADWP facilities. To reduce Department-wide GHG emissions, LADWP has instituted various programs including: increasing the generation of renewable energy to 33 percent by 2020, early divestiture of coal generation, repowering existing natural gas power plants, adopting an aggressive energy efficiency program, and use of electric fleet vehicles.

- a) **Less Than Significant Impact.** Project-related GHG emissions would be limited to air pollutants generated from equipment and vehicles during the remediation period. As described in Section 2.3.3 Air Quality, construction of the project would result in less than significant combustion emissions from vehicles and equipment.

According to the California Energy Commission (CEC, 2006), carbon dioxide (CO₂) accounts for approximately 84 percent of statewide greenhouse gas emissions, with methane accounting for approximately 5.7 percent of greenhouse gas emissions and nitrous oxide accounting for another 6.8 percent of greenhouse gas emissions. Other pollutants account for approximately 2.9 percent of greenhouse gas emissions in California. The transportation sector is the single largest category of California's greenhouse gas emissions, accounting for 41 percent of emissions statewide. In 2012, total California greenhouse gas emissions were 459 million metric tons of carbon dioxide equivalent (MMTCO₂e) (CARB, 2014).

Based on the estimated average day construction emissions (**Table 5**), annual emissions of greenhouse gases related to construction of the proposed project are summarized in **Table 6**. Since the GBUAPCD does not have established greenhouse gas thresholds of significance, LADWP reviewed threshold defined by the SCAQMD (the air district with jurisdiction over the air basin where LADWP has its main offices) and the state-wide air resources agency, CARB. SCAQMD's interim threshold of significance for greenhouse gases for industrial projects is 10,000 metric tons CO₂-equivalent emissions per year (adopted December 5, 2008; includes construction emissions amortized over 30 years and added to operational GHG emissions). CARB proposed a threshold of 7,000 metric tons of CO₂-equivalent emissions per year for operational emissions (excluding transportation).

The SCAQMD recommends that construction emissions be amortized over a 30-year period to account for the project's contribution to overall GHG emissions. If amortized over a 30-year period, remediation would contribute approximately 13 metric tons per year of CO₂-equivalent emissions. Predicted project greenhouse gas emissions are therefore less than either of these thresholds and less than significant. The project would not generate greenhouse gas emissions that would have a significant impact on the environment, either directly or indirectly.

Once operational, the project would result in only minimal vehicle emissions related to LADWP staff inspections of the project area. The impact on emissions of GHG, and thus climate change, would be less than significant.

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- b) **No Impact.** The proposed project would remediate existing contamination at a former dump site. The limited travel necessary for periodic inspection of the site would not conflict with greenhouse gas policies and regulations. Therefore, the project would have no adverse impact on GHG policies.

**Table 5
Summary of Estimated Average Day Construction Emissions**

Emissions Source	Vehicle Type	Avg No. per day	Est Avg miles per day	Emission Factor (lbs/mi) ¹									Estimated Project Emissions (lbs/average day)								
				VOC	CO	NOx	SOx	PM ₁₀	PM _{2.5}	CO ₂	CH ₄	N ₂ O	VOC	CO	NOx	SOx	PM ₁₀	PM _{2.5}	CO ₂	CH ₄	N ₂ O
Dump Truck	HHDT	3	70	0.001317	0.006047	0.015264	0.000039	0.000768	0.000624	4.207568	0.000062	0.001450	0.28	1.27	3.21	0.01	0.16	0.13	883.59	0.01	0.30
Water Truck	HHDT	1	2	0.001317	0.006047	0.015264	0.000039	0.000768	0.000624	4.207568	0.000062	0.001450	0.00	0.01	0.03	0.00	0.00	0.00	8.42	0.00	0.00
Workers Personal Vehicles ⁴	PV	10	43	0.000572	0.005029	0.000473	0.000011	0.000095	0.000062	1.105626	0.000050	0.000045	0.2	2.2	0.2	0.0	0.0	0.0	475.4	0.02	0.02
Total																					
Emissions Source (construction equipment)	No.	Est Avg hrs of use per day	Emissions Factor (lbs/hr) ²									Estimated Project Emissions (lbs/average day)									
			VOC	CO	NOx	SOx	PM ₁₀	PM _{2.5} ³	CO ₂	CH ₄	N ₂ O	VOC	CO	NOx	SOx	PM ₁₀	PM _{2.5}	CO ₂	CH ₄	N ₂ O	
Excavator	1	6	0.0848	0.5160	0.5181	0.0013	0.0249	0.0222	120	0.0077	0.049217	0.51	3.10	3.11	0.01	0.15	0.13	717.48	0.05	0.30	
Loader	2	6	0.0861	0.4470	0.5831	0.0012	0.0300	0.0267	120	0.0077	0.055394	1.03	5.36	7.00	0.01	0.36	0.32	1434.96	0.09	0.66	
Roller Compactor	2	6	0.0683	0.3885	0.4485	0.0008	0.0291	0.0259	120	0.0077	0.042605	0.82	4.66	5.38	0.01	0.35	0.31	1434.96	0.09	0.51	
Total																					

PV: passenger vehicles, HHDT: heavy-heavy-duty trucks

¹ SCAQMD. 2007a. EMFAC2007 version 2.3 Emission Factors for On-Road Passenger Vehicles & Delivery Trucks. Scenario Year 2018.

² SCAQMD. 2007b. SCAB Fleet Average Emission Factors (Diesel). Scenario year 2018.

³ SCAQMD. 2006. Final –Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance.

⁴ Average mileage per worker assumes 50 percent of workers are from Mammoth Lakes (30 miles away) and 50 percent from Bishop (13 miles away).

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Table 6
Estimated Annual Greenhouse Gas Emissions from Construction

Source	CO₂ metric tons (total)	CH₄ metric tons (total)	N₂O metric tons (total)
Average Day Construction Emissions	2.25	0.00012	0.001
Construction Emissions Annual Total	359.60	0.02	0.13
Global Warming Potential	1	21	310
CO ₂ -Equivalent Emissions	359.6	0.4	40.5
Total CO ₂ -Equivalent Emissions from Construction	400		
Amortized Construction Emissions	13		

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2.3.8 Hazards and Hazardous Materials

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to the risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion: The objective of the project is to stabilize the existing wastes, reduce existing and future exposure risks (specifically from lead contaminated soils), and minimize the potential for future illegal waste disposal at the Paradise Camp Dump site.

- a) and b) **Less Than Significant Impact.** Remediation of the Paradise Camp Dump would require disturbance to soils with lead concentrations in excess of State of California hazardous waste criterion. The remediation would proceed per the procedures outlined in the Work Plan. Environmental safeguards to be employed during the remediation include:
- Temporary traffic control may be used to manage heavy equipment entry and exit onto Rock Creek Road.

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- BMPs will be employed to reduce soil track-out onto Lower Rock Creek Road. BMPs will include stabilizing the construction entrance/exit with appropriate aggregate, steel ribbed plates, and street sweeping.
- Trained personnel will be on-site to monitor for petroleum hydrocarbon-derived VOCs with a PID to protect worker health and safety.
- Equipment that comes into contact with potentially contaminated soil will be decontaminated via water rinses and steam cleaning.
- Wastewater generated during decontamination will be temporarily stored in properly labeled California Department of Transportation (DOT)-approved steel drums or tanks (BakerCorp or similar tanks) in a designated area on-site. Wastewater will be sampled and analyzed in accordance with the disposal facility's requirements. If determined to be non-hazardous, it is anticipated that wastewater will be disposed at World Oil Recycling in Compton, California.
- If the stock pile is used, BMPs will be employed to protect the stockpile from erosion and run-off including placement in an upland area away from any water ways, covering the stockpile with plastic sheeting and creating a berm around the perimeter of the stockpile with fiber rolls.
- If the stock pile is used, the stockpile will be placed on plastic sheeting to prevent cross-contamination with the underlying surface.

Remediation of the dump site would also require the use of limited quantities of gasoline and diesel fuel for construction vehicles and equipment. Other chemical use is not anticipated.

LADWP would employ standard operating procedures for the routine transport, use, storage, handling, and disposal of hazardous materials related to the remediation. Therefore, with adherence to the standard operations procedures for hazardous materials use, impacts related to release or accidental exposure to humans or the environment would be less than significant.

- c) **Less Than Significant Impact.** There are no schools within ¼ mile of the project area. The closest schools are located in Bishop, over 13 miles southeast of the project site. The specific disposal site for hazardous soils is not known at this time. Therefore, it is possible that hauling trucks may drive within ¼ mile of an existing school. With adherence to standard hazardous materials transportation regulations, the impact would be less than significant.
- d) **Less than Significant Impact.** Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to update a list of known hazardous materials sites, which is also called the "Cortese List." The sites on the Cortese List are designated by the State Water Resources Control Board (SWRCB) and the Department of Toxic Substances Control (DTSC).

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Based on a search of hazardous waste and substances sites listed in the DTSC “EnviroStor” database; a search of leaking underground storage tank (LUST) sites listed in the SWRCB “GeoTracker” database; and a search of solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit, the closest Cortese List sites are:

- A LUST at the Middle Gorge Power Plant – approximately 5 miles north of the dump site, cleanup status closed
- A Southern California Edison Cleanup Program Site at Owens Gorge – approximately 3 miles south of the dump site, case closed

However, the project site is a former waste disposal site, with soils that have lead concentrations in excess of State of California hazardous waste criterion. Since the project would remediate and stabilize the wastes at the site, the impact would be beneficial and less than significant.

- e) and f) **Less Than Significant Impact.** Two public airports are operated in Mono County: Bryant Field in Bridgeport and Lee Vining Airport. Additionally, the Mammoth-Yosemite Airport is administrated by the Town of Mammoth Lakes. The closest airport is in Bishop, over 13 miles southeast of the dump site. Large or tall structures are not proposed as part of the project, and the project is not located sufficiently near either a private airstrip or public airport to pose a safety risk. Therefore, project-related impacts on airport safety would be less than significant.
- g) **Less Than Significant Impact.** Limited numbers of construction workers and waste/soil/recyclables hauling trucks would travel to and from the project site via Highway 395. Local roads such as Lower Rock Creek Road (not part of an emergency evacuation plan route) would also be used throughout the construction period, but no road closures are planned. Local emergency response agencies (Mono County Sheriff’s Department, California Department of Forestry and Fire Protection, Bishop Fire Department) would be notified of the timing and duration of the remediation. Since the project site is not designated as an emergency staging area, the project would have a less than significant impact on emergency access and evacuation plans.
- h) **Less Than Significant Impact.** New habitable structures are not proposed as part of the project. Project remediation would not increase fire risk since vegetation to be removed would be re-used as mulch onsite. Once revegetated, the risk of fire at the project site would be similar to or less than existing conditions. Therefore, the proposed project would have a less than significant impact related to wildland fires.

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2.3.9 Hydrology and Water Quality

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a) and f) **Less than Significant Impact.** The project area is in the Chalfant Valley watershed in the Upper Owens Hydrologic Area. Beneficial uses and water quality objectives are specified in the Water Quality Control Plan for the Lahontan Region (Basin Plan) prepared by the Lahontan Regional Water Quality Control Board (Regional Board, 2005). Relevant to the project site, beneficial uses are designated for Rock Creek (**Table 7**).

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**Table 7
Beneficial Uses of Lower Rock Creek**

Surface Water	MUN	AGR	GWR	REC-1	REC-2	COMM	COLD	WILD
Rock Creek	X	X	X	X	X	X	X	X

MUN – municipal and domestic supply; AGR – agricultural supply; GWR – groundwater recharge; REC-1 – water contact recreation; REC-2 – noncontact water recreation; COMM – commercial and sportfishing; COLD – cold freshwater habitat; WILD – wildlife habitat
Source: Regional Board, 2005

Waterbody-specific numeric objectives for the protection of these beneficial uses are summarized in **Table 8**. Additional narrative and numeric water quality standards for all surface waters in the region are applicable for: ammonia, coliform bacteria, biostimulatory substances, chemical constituents, total residual chlorine, color, dissolved oxygen, floating materials, oil and grease, non-degradation of aquatic communities and populations, pesticides, pH, radioactivity, sediment, settleable materials, suspended materials, taste and odor, temperature, toxicity, and turbidity.

**Table 8
Water Quality Objectives**

Water Body	Objective (mg/L)							
	TDS	Cl	SO ₄	F	B	NO ₃ -N	Total N	PO ₄
Rock Creek (above diversion)	21/23	1.2/2.0	-	0.05/0.05	0.06/0.06	0.3/0.5	0.4/0.7	0.01/0.01
Rock Creek (Round Valley)	48/70	1.8/4.0	5.0/7.0	0.16/0.30	0.03/0.06	0.4/0.5	0.6/0.7	0.15/0.28

Source: Regional Board, 2005

During project construction, disturbance to surface soils would result from remediation activities. Since disturbance to surface soils would exceed 1 acre, storm water would be managed in accordance with BMPs identified in a SWPPP developed by the Qualified Storm water Developer (QSD) and implemented by the Qualified Storm water Practitioner (QSP) in compliance with the NPDES General Permit for Storm Water Discharges Associated with Construction Activity (General Permit). The types of BMPs to be implemented are summarized in **Table 9**. With implementation of the required SWPPP, potential increases of sediment load in storm water would not adversely affect surface water beneficial uses. Therefore, the impact on water quality during project construction would be less than significant.

Disturbed soil will be placed in an upland area away from any water ways. Disposal and soil borrow areas will be seeded, and storm water BMPs will be installed to further reduce future erosion potential. LADWP shall implement measures to prevent sediment or materials

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deleterious to fish and wildlife resources from being deposited into a waterway, or placed where they could be washed into a waterway. These measures may include, but are not limited to, the installation of sediment curtains, certified weed free straw bales, certified weed free straw wattles, and/or silt fences depending on what is appropriate for site specific conditions. Once remediation activities are completed, the risk of storm water runoff with elevated concentrations of lead would be reduced over existing conditions. Upon completion of the project, a Statewide storm water permit for industrial activities will be acquired, if necessary.

Table 9
Summary of Anticipated Construction Stormwater BMPs

Best Management Practices for the Protection of Stormwater Quality During Construction
<p><u>Housekeeping Measures</u></p> <ul style="list-style-type: none"> • Conduct an inventory of products used or expected to be used • Placement of any soil spoil in an upland area away from any waterway • Cover and/or berm loose stockpiled construction materials • Store chemicals in watertight containers
<p><u>Employee Training</u></p> <ul style="list-style-type: none"> • QSP to brief staff on the importance of preventing storm water pollution • QSP to train staff on SWPPP • Conduct refresher training during the wet season • Document training
<p><u>Erosion and Sediment Controls</u></p> <ul style="list-style-type: none"> • Provide effective cover for inactive areas – cover, berm, or direct runoff to suitable basins • Establish and maintain effective perimeter control • Stabilize construction entrances and exits to control sediment – inspect ingress and egress points daily, and maintain as necessary • Control dust during earthwork • Place sandbags or other barriers to direct storm water flow to suitable basins
<p><u>Spill Prevention and Control</u></p> <ul style="list-style-type: none"> • Inspect construction equipment for leaking • Use drip pans until equipment can be repaired • Cleanup spills Immediately – remove adsorbent promptly • Notify the proper entities in the event of a spill
<p><u>Hazardous Waters Management and Disposal</u></p> <ul style="list-style-type: none"> • Store hazardous wastes in covered, labeled containers with secondary containment for liquid hazardous wastes • Store wastes separately to promote recycling and to prevent undesirable chemical reactions
<p><u>Materials Handling and Storage</u></p> <ul style="list-style-type: none"> • Establish a designated area for hazardous materials • Berm, cover, and/or contain the storage area as necessary to prevent materials from leaking or spilling • Store the minimum volume of hazardous materials necessary for the work

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Best Management Practices for the Protection of Stormwater Quality During Construction

Vehicle and Equipment Maintenance, Repair, and Storage

- Inspect vehicles and equipment regularly
- Conduct maintenance off site as necessary
- Areas for storage will be covered with tarp and located away from water ways and where fluids can be captured and disposed of properly

Scheduling

- Avoid work during storm events
- Stabilize work areas prior to predicted storm events

- b) **Less than Significant Impact.** The project does not include installation of new wells or groundwater withdrawals. The project would not deplete groundwater supplies or alter groundwater recharge, therefore, there would be no impacts on groundwater. Removal of contaminated soils would reduce the potential for migration of lead to the groundwater, the impact is beneficial and less than significant.
- c) d) and e) **Less Than Significant Impact.** The project would result in localized changes to drainage from the proposed remediation, but storm water flow patterns would not be substantially altered. Following excavation of the western anomaly, imported soil from the designated borrow site will be used as backfill to bring the excavated area up to existing grade based on the previous land survey (Geo-Logic Associates, 2017). After wastes have been removed, on-site ephemeral washes would be graded similar to existing conditions. Therefore, impacts on drainage patterns would be less than significant.
- g) and h) **No Impact.** A 100-year floodplain Zone A (no base flood elevations determined) has been mapped for Lower Rock Creek, and extended to include the Paradise Transfer Station and portions of the remediation area (Federal Emergency Management Agency [FEMA], 2011). The remediation would not include development of new structures or berms which would redirect flood flows; post-remediation grade would be similar to existing conditions. Additionally, no habitable structures exist in the immediate area of the project site and none are proposed as part of the project. Remediation of the dump site would have no impact on housing or structures in a 100-year flood hazard area.
- i) **No Impact.** Portions of the remediation site are within a 100-year flood zone. However, there are no levees or dams on the site, and no habitable structures on or near the site. Remediation of contaminated soils would not expose people to risks associated with flooding.
- j) **No Impact.** Due to the distance to the ocean, tsunami is not relevant for the proposed project. According to the Mono County General Plan Safety Element (2012), there is no available evidence that seiches have occurred in Mono County lakes and reservoirs. Mudflows in the area, if any, would not impact habitable structures since none are present. Therefore, the project would have no impacts related to seiche, tsunami or mudflow.

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2.3.10 Land Use and Planning

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a) **No Impact.** The closest residences to the dump site are approximately 0.6 mile to the south and 1 mile to the northwest in the community of Paradise. No habitable structures are located on or immediately adjacent to the project site, and none are planned as part of the proposed project. Therefore, there would be no project-related impacts on established communities.
- b) **Less Than Significant Impact.** The project site is entirely located on LADWP-owned lands within Mono County. In Mono County, the General Plan and Zoning Code have been combined into one document; the General Plan maps the area as OS. Remediation of the site would be consistent with this designation since the project would protect and retain the open space of the site. No land development is proposed once the remediation activities are completed.

The BLM manages lands east of the project site. However, remediation of the dump site would not require travel on federally managed roadways or lands. Therefore, the project is consistent with federal land use plans.

Since the remediation project would not conflict with any applicable land use plan, the impact on land use would be less than significant.

- c) **Less than Significant Impact.** Please see Section 2.3.4 Biological Resources, item f.

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2.3.11 Mineral Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: Important mineral resources in the general project area include gravel deposits associated with alluvial fans. Mono County is the Lead Agency for the implementation of the Surface Mining and Reclamation Act of 1975 (SMARA), which establishes statewide policies for the conservation and development of mineral lands in California. All surface mining operations that disturb greater than 1 acre or move more than 1,000 cubic yards or more are required to have an approved reclamation plan before the start of mining activity.

a) and b) **No Impact.** There are active sand and gravel mines in Mono County (e.g., Cain Ranch, Lee Vining), as well as closed mines located in the vicinity of the project site. Remediation activity would not occur on or near the active mining operations or within the boundaries of a mineral lease area. Remediation would require soils from a nearby borrow area. However, the proposed project would have no impact on the loss of availability of a known mineral resource or mineral resource recovery site.

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2.3.12 Noise

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: The Paradise Camp Dump is located in a remote area of California’s Eastern Sierra where the main source of noise is the roadway noise along Highway 395. There are no sensitive noise receptors in the immediate vicinity of the project area; the closest inhabitants are located approximately 0.6 miles south of the dump site.

The noise goal identified in the Mono County Noise Element (Mono County, 2010) is to: maintain existing ambient noise levels to preserve the county's quiet, rural atmosphere. Objectives to reach this goal include:

- Minimize the impacts of existing noise-generating activities
- Minimize the impacts of new noise sources on the noise environment
- Avoid the juxtaposition of potentially noise-incompatible land uses

Mono County policy is to prohibit unnecessary, excessive and annoying noises from all sources subject to its police power. Relevant to construction activity, the County’s Noise Ordinance (Chapter 10.16 of the Mono County Code) considers the following prohibited acts:

- Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration, or demolition work between weekday hours of seven p.m. and seven a.m., or at any time on Sundays, weekends or holidays, such that the sound therefrom creates a

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noise disturbance across a residential or commercial real property line, except for emergency work of public service utilities or by variance issued by the planning commission. Where technically and economically feasible, construction activities shall be conducted in such a manner that the maximum noise levels at affected properties will not exceed those listed in the following schedule:

- a. At residential properties:
 - i. Mobile equipment:
Maximum noise levels for nonscheduled, intermittent, short-term operation (less than ten days) of mobile equipment as set out in Table 10.16.090A of this section.
 - ii. Stationary equipment:
Maximum noise levels for repetitively scheduled and relatively long-term operation (periods of ten days or more) of stationary equipment as set out in Table 10.16.090B of this section.

Table 10.16.070 of the Noise Code lists the rural suburban exterior noise limit (level not to be exceeded more than 30 minutes in any hour) as 40 dBA for one or two family residential (10 p.m. to 7 a.m.) and 50 dBA for 7 a.m. to 10 p.m. Sound levels in decibels measured on a sound level meter using the A-weighting network are described as dBA.

- a) and d) **Less Than Significant Impact.** The closest noise receptors to the project site are residences located approximately 0.6 miles south of the dump site. During remediation, noise would be generated from construction equipment (excavator, loader, compactor, water trucks, haul trucks) and personal vehicles. With a minimum distance of 0.6 miles to the closest temporary resident, construction noise would not be noticeable to sensitive receptors. For example, construction noise of 89 dBA at 50 feet (approximate excavation and grading noise level per USEPA, 1971) would attenuate to approximately 53 dBA at 0.6 miles (Canter, 1977). Additionally, construction activity would not occur during 10:00 p.m. to 7:00 a.m. when there is greater potential for noise disturbance to temporary inhabitants. Therefore, given the distance from the project site to sensitive receptors, the project would not cause noise levels to exceed established thresholds and noise impacts would be less than significant.
- b) **Less Than Significant Impact.** Equipment necessary for the remediation is limited to one excavator, two loaders, two compactors, one water truck, several dump trucks for hauling and the workers' personal vehicles. From this type of equipment, the generation of groundborne vibration and groundborne noise would be very limited. With no residences within 0.5 miles of the project site, impacts related to temporary groundborne vibration or noise would be less than significant.
- c) **Less Than Significant Impact.** Noise generated during project operation would include vehicle travel to the site for inspection. This routine travel to the site would be the same as existing conditions and would not generate noise noticeable by any sensitive receptors. Noise impacts from project operation would therefore be less than significant.

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- e) and f) **No Impact.** Two public airports are operated in Mono County: Bryant Field in Bridgeport and Lee Vining Airport. Additionally, the Mammoth-Yosemite Airport is administrated by the Town of Mammoth Lakes. The closest airport to the remediation site is in Bishop, in Inyo County. Since the closest airport is over 13 miles south of the remediation site, the project would not be located sufficiently near either a private airstrip or public airport to expose people residing or working in the area to experience excessive noise levels. There would be no project-related impacts on noise near an airport/airstrip.

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2.3.13 Population and Housing

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a) **Less Than Significant Impact.** Since the project does not include construction of homes or businesses, it would not directly impact population growth in the Paradise area. However, construction of the project would require approximately 10 workers. This minor number of workers over an approximately 6 month construction period would have a less than significant impact on population growth.
- b) and c) **No Impact.** No habitable structures are planned as part of the remediation project. Therefore, there would be no impacts on housing from construction and operation of the project.

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2.3.14 Public Services

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

i – v) **No Impact.** New habitable structures are not proposed as part of the remediation project. The limited number of construction workers required to implement the project (approximately 10) would not generate substantial population growth or create the need for new or expanded public services. Therefore, there would be no project-related impacts on fire protection, police protection, schools, parks, or other public facilities.

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2.3.15 Recreation

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: Lower Rock Creek and the surrounding areas are used for recreation. The Mono County General Plan includes a policy to support recreational activities and the ability to use and enjoy the land while also protecting the natural environment.

- a) **Less Than Significant Impact.** New habitable structures are not proposed as part of the remediation project. The limited number of construction workers required to implement the project would not generate substantial population growth or create the need for new or expanded parks. Therefore, the project would have a less than significant impact related to increased use of neighborhood or regional parks or other recreation facilities. Access to recreation along Lower Rock Creek would not be impacted by the project.
- b) **No Impact.** The project does not include the construction of recreational facilities or generate population growth that would require the construction or expansion of recreational facilities. Therefore, there would be no impacts related to the construction or expansion of recreational facilities.

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2.3.16 Transportation and Traffic

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: The major roadway in the project vicinity is U.S. Highway 395, the main north-south transportation route through the Mono Basin. In the vicinity of the project site, Highway 395 is a four-lane divided highway.

- a) and b) **Less Than Significant Impact.** Level of Service (LOS) is a qualitative measure describing operational conditions within traffic stream, or the perception by motorists and/or passengers which is calculated based on a number of design and operating criteria, such as lane width, roadside obstacles, trucks and buses, curvature, grades, etc. (Transportation Research Board, 2000). LOS A reflects free-flow conditions; at LOS E a road is operating at capacity and is congested. Typically, LOS C or LOS D represents acceptable flow conditions. The highway capacity as determined by the Highway Capacity Manual 2000 for a two-lane highway is 1,600 passenger cars per hour (pc/h) for each direction of travel; the capacity of a two lane-highway is 3,200 pc/h for both directions of travel combined. In 2016, average annual daily traffic (AADT – total traffic volume for the year divided by 365 days) on Highway 395 at the Inyo/Mono County line was 3600 to 3700 vehicles, with a peak hour of 580 to 590

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vehicles (Caltrans, 2016). Based on 2016 data, this roadway operates well below capacity at LOS A.

Disposal site for wastes and recyclables are located in Buttonwillow, Kettleman City, Compton, and unincorporated Inyo County, California, and Beatty, Nevada (up to approximately 300 miles from the project site). Assuming 10 cubic yards per truck load, approximately 130 truck trips would be required to transport recyclables to unincorporated Inyo County and approximately 35 truck trips would be required to transport hazardous soils. Additional trips to Compton may be required for disposal of wastewater used for decontamination. Approximately 136 trips would be required to bring clean soil to the site from nearby borrow site(s). These trips would occur over approximately 6 months. Workers commuting to the project site would also travel on Lower Rock Creek Road and Highway 395. Once transported to the site, the construction equipment would remain in place for the duration of the remediation, and then be demobilized. Based on the estimated number of workers (approximately 10), haul trips (1-3 per day) and the existing excellent LOS on the local roads and highway, project-related impacts on Highway 395 would be temporary and less than significant.

- c) **No Impact.** Two public airports are operated in Mono County: Bryant Field in Bridgeport and Lee Vining Airport. Additionally, the Mammoth-Yosemite Airport is administrated by the Town of Mammoth Lakes. The closest airport is in Bishop, over 13 miles south of the dump site. The project does not include tall structures that would alter air traffic patterns. Therefore, the remediation would have no impact on air traffic safety.
- d) **Less Than Significant Impact.** Under the proposed project, travel by construction vehicles in the project area would occur for approximately 6 months. The estimated maximum of 5 haul trucks per day would not substantially increase traffic hazards related to turning off Highway 395. Additionally, temporary traffic control may be used to manage heavy equipment entry and exit onto Rock Creek Road. Impacts related to roadway hazards would be less than significant.
- e) **Less Than Significant Impact.** The remediation area is currently accessible to emergency vehicles via Highway 395 and Lower Rock Creek Road. Construction activities would temporarily increase the volume of trucks travelling on these roadways, but no road closures are planned. Local emergency response agencies (Mono County Sheriff's Department, Bishop Fire Department, California Department of Forestry and Fire Protection) would be notified of the timing and duration of the remediation. The impact of the addition of approximately 10 workers commuting to the site and the increased traffic from haul trucks would be less than significant on emergency access.
- f) **No Impact.** The project would not include housing, employment, or roadway improvements relevant to alternative transportation measures. Therefore, there would be no project-related impacts on alternative transportation.

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2.3.17 Tribal Cultural Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion: Consultation with Native American organizations and individuals was conducted to satisfy the requirements of AB 52. Consultation with the NAHC began on November 8, 2017 to request information about sacred or traditional cultural properties that may be located within the project site. A search of the Sacred Lands file housed at the NAHC, dated December 5, 2017, did not result in the identification of traditional cultural places within or surrounding the project area. The NAHC also provided a list of 10 local groups and individuals to contact for further information regarding their knowledge of cultural resources within and near the project site. On January 29, 2018, letters were mailed to these 10 Native American contacts, to request information regarding local knowledge about cultural resources, traditional gathering areas, or sacred lands in or near the project site. As of April 2018, one request for consultation has been received from the Bishop Paiute Tribe.

a) i) and ii). **Less than Significant Impact with Mitigation Incorporated.** The project site contains cultural resources eligible for inclusion in the CRHR. Since avoidance of the resources is not consistent with remediation of the contaminated soils, mitigation measures (CUL-1 through CUL-6) have been identified to recover data from significant sites and reduce impacts on cultural resources. Traditional cultural places have not been identified for the project area. The project would have a less than significant impact as mitigated on CRHR-listed or eligible resources, and on resources significant to a California Native American tribe.

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2.3.18 Utilities and Service Systems

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a) and b) **No Impact.** Habitable structures are not present on the project site and none are proposed as part of the project. The limited number of construction workers (approximately 10) required for the remediation would not create the need for new or expanded water or wastewater service. Wastewater generated at portable toilets would be treated locally (e.g., June Lake Public Utility District or Bishop Department of Public Works) in compliance with the requirements of the Lahontan Regional Water Quality Control Board. The project would have no impact on water or wastewater treatment facilities or wastewater treatment requirements.
- c) **No Impact.** The project area does not have storm drain infrastructure or connect to any off-site storm drain facilities. Therefore, the project would have no impact on storm drain facilities. Two ephemeral washes transverse the project site and carry flows to Lower Rock Creek. During both construction and operation, stormwater BMPs would be installed to maintain stormwater quality.
- d) **Less Than Significant Impact.** In addition to the negligible potable water demand from construction workers, water would be used for dust control during remediation and during

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revegetation of the project site. Water would be provided from an existing groundwater well. Since no new water supplies or entitlements would be required, the impact on water supplies would be less than significant.

- e) **Less Than Significant Impact.** Portable toilets would be provided for the approximately 10 construction workers required for the remediation. Wastewater generated at portable toilets would be treated locally in compliance with the requirements of the Lahontan Regional Water Quality Control Board. Water used for decontamination will be tested and as warranted stored in appropriate containers and transported to a suitable facility in Compton. Due to the negligible increase in wastewater generated during project construction, the impact on wastewater treatment capacity would be less than significant.
- f) and g) **Less Than Significant Impact.** The proposed project is a solid waste remediation project. An estimated 350 cubic yards of contaminated soil would be excavated from the site, and an additional 3,850 cubic yards of soil would be screened for recyclables. Vegetation removed during the remediation would be reused onsite as mulch. All hazardous and non-hazardous wastes related to the project will be disposed at permitted facilities (Buttonwillow, Kettleman City, Compton, and Unincorporated Inyo County in California, and/or Beatty, Nevada), in compliance with applicable regulations. Therefore, impacts related to solid waste disposal would be less than significant.

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2.3.19 Mandatory Findings of Significance

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) 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, effects of other current projects, and the effects of probable future projects.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a) **Less Than Significant Impact With Mitigation Incorporated.** The remediation project is not anticipated to impact sensitive species, since suitable habitat is not present. However, mitigation measures have been defined to protect nesting birds and roosting bats from inadvertent disturbance and harm during construction, and minimize the spread of invasive species. Significant cultural resources are known for the site, however, avoidance of the resources is not consistent with remediation of the contaminated soils. Therefore, cultural resources mitigation measures have been identified to conduct data recovery and to protect cultural resources. Therefore, with implementation of mitigation measures, impacts on biological and cultural resources would be less than significant.

- b) **No Impact.** The objective of the project is to stabilize the existing wastes, reduce existing and future exposure risks, and minimize the potential for future illegal waste disposal at the Paradise Camp Dump site. As mitigated, temporary impacts from project construction would be less than significant. Long-term, the project would be beneficial for human health. There are no short-term goals related to the project that would be disadvantageous to this long-term goal.

- c) **Less Than Significant Impact.** No other projects are known for the immediate project area. Cumulatively with other remediation efforts, the project is beneficial for human health and safety. Cumulatively significant adverse impacts with other projects are not anticipated.

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- d) **Less Than Significant Impact.** Temporary restrictions on recreational access would be implemented to protect public safety during remediation. The impact would be temporary and less than significant.

Section 3

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3.2 ACRONYMS AND ABBREVIATIONS

AADT	average annual daily traffic
AB	Assembly Bill
AL	Action Level
ARAR	Applicable or Relevant and Appropriate Requirements
ARMR	Archaeological Resource Management Reports
ARPA	Archaeological Resources Protection Act
BLM	Bureau of Land Management
BMPs	best management practices
BNHM	Berkeley Natural History Museum
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDC	California Department of Conservation
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CIWMB	California Integrated Waste Management Board
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRHR	California Register of Historic Resources
DOT	Department of Transportation
DTSC	Department of Toxic Substances Control
EIC	Eastern Information Center (at University of California at Riverside)
EIR	Environmental Impact Report

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EPA	(United States) Environmental Protection Agency
ESA	Endangered Species Act
Farmland	Prime Farmland, Unique Farmland, or Farmland of Statewide Importance
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
GBUAPCD	Great Basin Unified Air Pollution Control District
GHG	greenhouse gas
GLO	(United States) General Land Office
HCP	Habitat Conservation Plan
HHW	Household Hazardous Waste
Hwy	Highway
IS	Initial Study
LADWP	(City of) Los Angeles Department of Water and Power
LEA	Local Enforcement Agency
LOS	Level of Service
LUST	Leaking Underground Storage Tank
MMTCO_{2e}	million metric tons of carbon dioxide equivalent
MND	Mitigated Negative Declaration
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OS	Open Space
pc/h	passenger cars per hour
PID	Photo-ionization detector
PM	particulate matter
PM₁₀	particulate matter 10 microns or less in diameter
QSD	Qualified Storm water Developer
QSP	Qualified Storm water Practitioner
RCRA	Resource Conservation and Recovery Act
SIP	State Implementation Plan

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SMARA	Surface Mining and Reclamation Act
SNA	Significant Natural Areas
SR	State Route
STLC	Soluble Threshold Limit Concentration
SWIS	Solid Waste Information System
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TCLP	Toxicity Characteristic Leaching Procedure
THPO	Tribal Historic Preservation Officer
TPH	Total Petroleum Hydrocarbons
TTLC	Total Threshold Limit Concentration
TVPH	Total Volatile Petroleum Hydrocarbons
UCMP	University of California Museum of Paleontology
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VOC	Volatile organic compound
WDR	Waste Discharge Requirement
XRF	x-ray fluorescence

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