

# **Mono Winter Access Parking**

U.S. 395 junctions with Mammoth Scenic Loop and Obsidian Dome/Bald

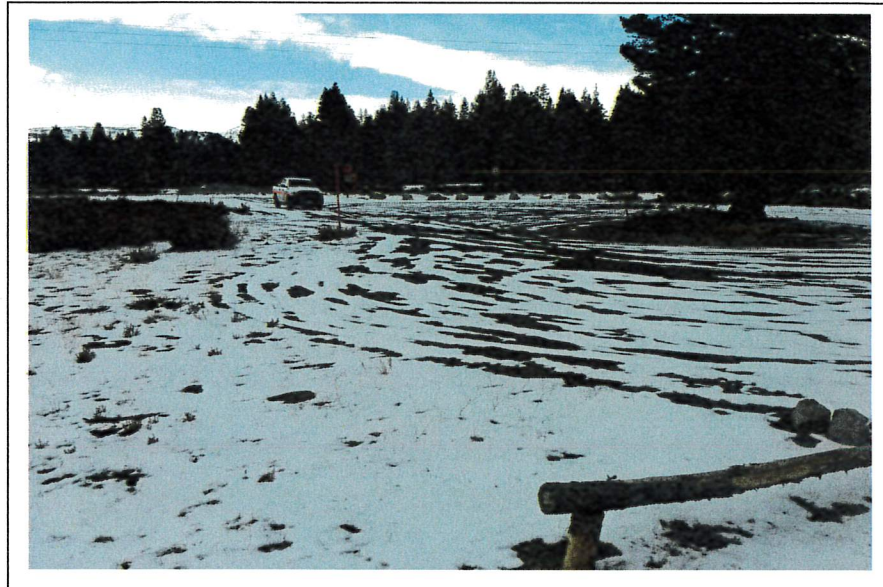
Mountain Road

09-MNO-395-PM 30.7 and 36.5

0917000070; 09-37300

SCH # 2018121043

## **Initial Study with Negative Declaration**



Prepared by the  
State of California Department of Transportation

**February 2019**



## General Information About This Document

The California Department of Transportation (Department) has prepared this Initial Study with Negative Declaration for the project located in Mono County, California. The Department is the lead agency under the California Environmental Quality Act (CEQA). The document tells you why the project is being proposed, what alternatives have been considered for the project, how the existing environment could be affected by the project, the potential impacts of each of the alternatives, and the proposed avoidance, minimization, and/or mitigation measures. The Initial Study was circulated to the public for 30 days between December 14, 2018 and January 13, 2019. Comments received during this period are included in Appendix B. Elsewhere throughout this document, a vertical line in the margin indicates a change made since the draft document circulation. Minor editorial changes and clarifications have not been so indicated. Additional copies of this document and the related technical studies are available for review at the Caltrans District 9 Office located at 500 S. Main Street, Bishop, CA 93514. This document may be downloaded at the following website

<http://www.dot.ca.gov/d9/projects/monowinteraccess/index.html>

### Alternative Formats:

For individuals with sensory disabilities, this document is available in Braille, in large print, on audiocassette, or on computer disk. To obtain a copy in one of these alternate formats, please call or write to Caltrans, Attn: Florene Trainor, 500 S. Main St, Bishop CA 93514; (760) 872-0603, or use California Relay Service 1 (800) 735-2929 (TTY), 1 (800) 735-2929 (Voice), or 711.

## PROJECT DESCRIPTION AND BACKGROUND:

<b>Project Title:</b>	<b>Mono Winter Access Parking</b>
<b>Lead Agency Name and Address:</b>	CA Department of Transportation (Caltrans) 500 S. Main Street, Bishop CA 93514
<b>Contact Person and Telephone Number:</b>	Bradley Bowers (760) 872-2331
<b>Project Location:</b>	U.S. 395 in Mono County at junctions with Mammoth Scenic Loop and Obsidian Dome/Bald Mountain Road
<b>Description of Project:</b>	In conjunction with the US Forest Service (USFS), Caltrans will pave three locations to provide off-highway parking to access recreational trails. Locations 1 and 3 are existing dirt parking areas which will need to be graded and paved. Location 2 is an undisturbed area where trees and vegetation would need to be removed to grade and pave a new 260ft x 150ft parking area. Next to Location 2 an existing utility access road would be rerouted, requiring grading and vegetation removal. Approval under the National Environmental Policy Act (NEPA) will be completed separately by the U.S. Forest Service. There are two alternatives under review for the project: the build alternative and a no-build alternative. Unless otherwise stated, all further discussion in this document refers to the build alternative. The build alternative is preferred by the Department.
<b>Surrounding Land Uses and Setting:</b>	All project locations occur within 1000ft of US 395 on property managed by the Inyo National Forest. These areas are currently used for vehicle parking and recreational access to the Bald Mountain, Obsidian Dome, and Mammoth Scenic Loop Trailheads.
<b>Purpose and Need</b>	The purpose of this project is to provide designated off-highway winter access parking for recreational users of the Inyo Forest Trail systems at the Bald Mountain, Obsidian Dome and Mammoth Scenic Loop trailheads as well as to facilitate Caltrans' maintenance activities. The project is needed because there is currently insufficient off-highway parking to meet Caltrans' and user needs, and because some recreational users are currently parking on highway shoulders creating a potential hazard to snow plows and motorists.
<b>Other Public Agencies Whose Approval is Required:</b>	U.S. Forest Service – Inyo National Forest California Transportation Commission (CTC)
<b>Have CA Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to PRC 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?</b>	Based on the traditional and culturally-affiliated geographic areas identified by the tribes who contacted the District in accordance with PRC § 21080.3.1 (b), this project is located in an area identified as geographically affiliated with the Big Pine Paiute Tribe. No other tribes identified this area in accordance with PRC § 21080.3.1. In accordance with AB 52, notification letters were sent to representatives of the Big Pine Paiute Tribe on April 27, 2018. No requests for consultation were received by the Department.

### **ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would be potentially affected by this project. Please see the CEQA checklist for additional information. Any boxes *not* checked represent issues that were considered as part of the scoping and environmental analysis for the project, but for which no adverse impacts were identified; therefore, no further discussion of those issues is in this document.

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

## Negative Declaration

Pursuant to: Division 13, Public Resources Code

### ***Project Description***


The California Department of Transportation (Caltrans) will pave three locations to provide off-highway parking to access hiking, bicycle and snowmobile trails. All three locations are along U.S. 395 in Mono County between the towns of Mammoth and June Lake. Locations 1 and 3 are existing dirt parking areas which will need to be graded and paved. Location 2 is an undisturbed area where trees and vegetation would need to be removed to grade and pave a new 260ft x 150ft parking area. Next to Location 2 an existing utility access road would be rerouted, which will also require grading and vegetation removal.

### ***Determination***

The Department has prepared an Initial Study for this project, and following public review, has determined from this study that the proposed project would not have a significant effect on the environment for the following reasons:

The project would have no effect on: hazards and hazardous materials, land use and planning, mineral resources, noise, population and housing, public services, and transportation/traffic services.

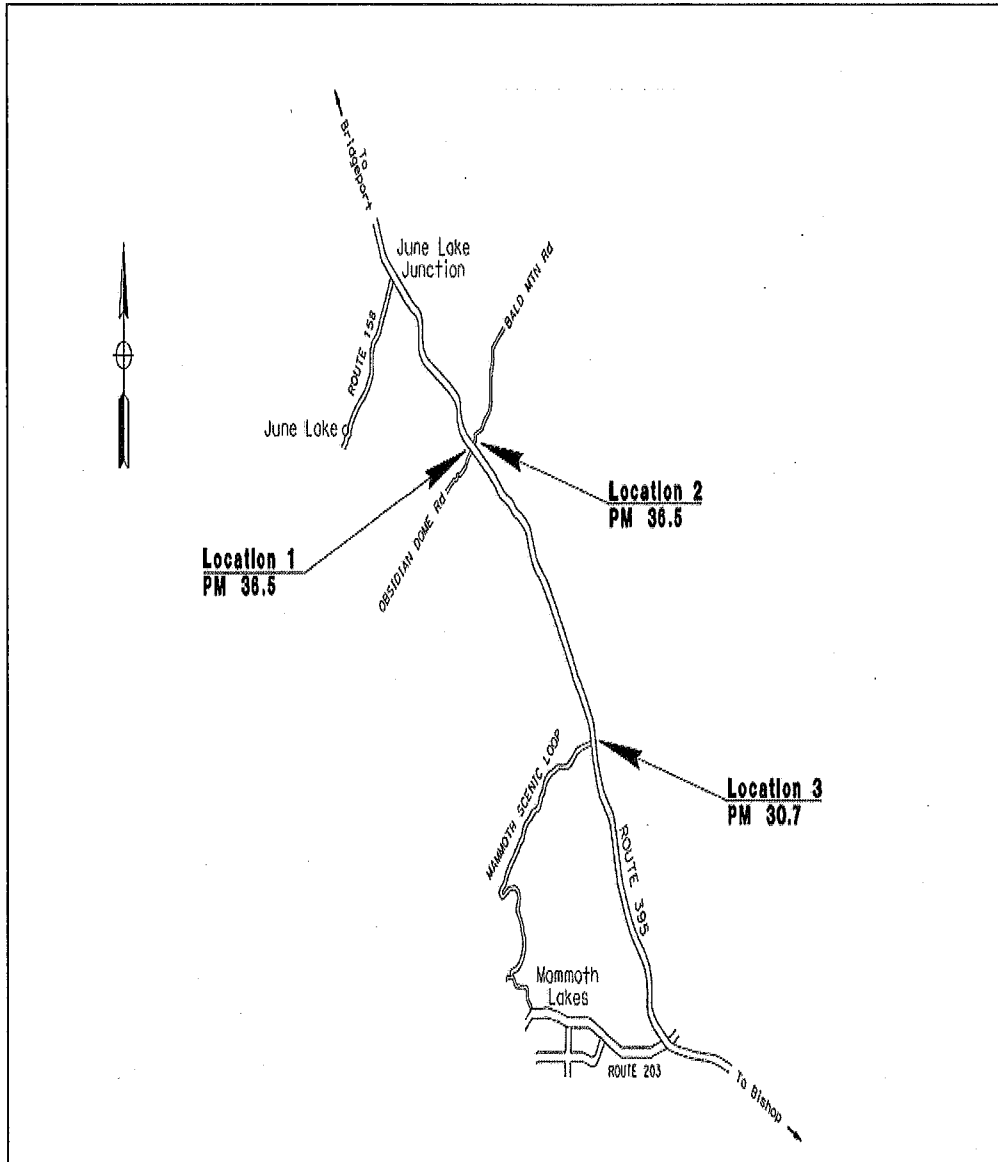
In addition, the project would have no significant effect on: aesthetics, agricultural and forest resources, air quality, biological resources, cultural resources, geology and soils, hydrology and water quality, recreation, and utilities and service systems.



Ryan Dermody  
Deputy District Director of Planning and Environmental  
District 9  
California Department of Transportation

2/7/19

Date



**Figure 1 Project Vicinity Map**



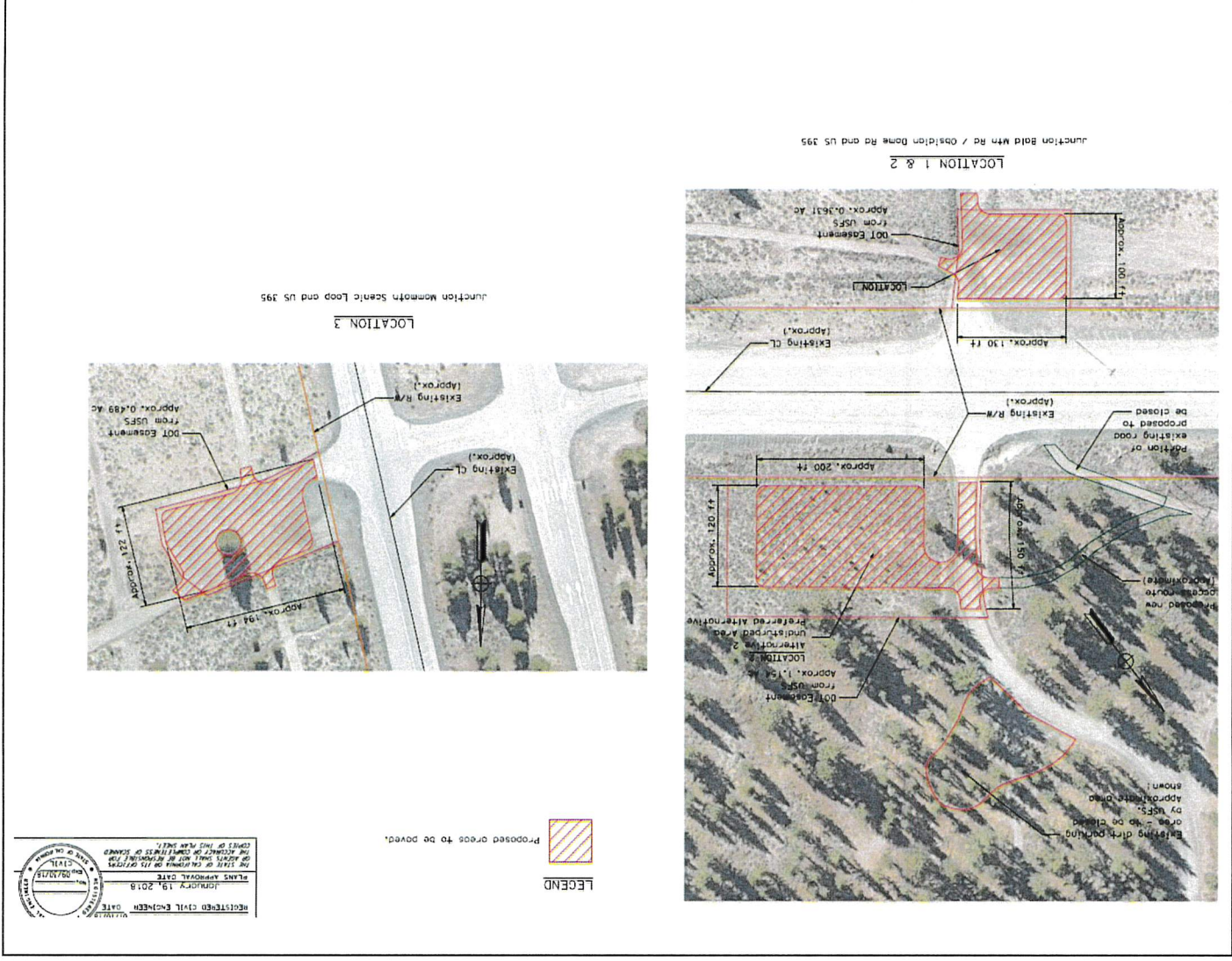


Figure 2 Project Location Map

# CEQA Environmental Checklist

09-MNO-395

30.7 and 36.5

0917000070

Dist.-Co.-Rte.

P.M/P.M.

Project ID#

This checklist identifies physical, biological, social and economic factors that might be affected by the project. In many cases, background studies performed in connection with the projects indicated no impacts. A NO IMPACT answer in the last column reflects this determination. Where a clarifying discussion is needed, the discussion either follows the applicable section in the checklist or is placed within the body of the environmental document itself. The words "significant" and "significance" used throughout the following checklist are related to CEQA—not NEPA—impacts. The questions in this form are intended to encourage the thoughtful assessment of impacts and do not represent thresholds of significance.

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<b>I. AESTHETICS:</b> Except as provided in Public Resources Code §21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>
<p>U.S. 395 through the project limits has been designated as part of the Mono County Scenic Highway System and listed as a Designated State Scenic Highway. Two of the parking areas will be built in existing unpaved areas often used for recreational parking. The one new parking location is located across U.S. 395 from an existing dirt parking area, and next to another existing parking area (planned for decommission by the USFS; see Figure 2). Adding pavement to existing dirt lots and creating a new lot near existing ones will not significantly alter the visual character surrounding the scenic highway. No distinct scenic resources are anticipated to be affected by the project. <i>Scenic Resource Evaluation and Visual Impact Assessment, October 2018</i></p>				
c) In non-urbanized areas, substantially degrade the existing visual character or quality of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The project setting is a non-urbanized area within the Inyo National Forest. It is expected that the distance between the parking areas and the highway, as well as the existing shrubland vegetation between the two will reduce the visibility of the improved facilities from traveling motorists to a negligible level. Paved and unpaved recreational staging areas are common along the US 395 corridor and would not appear visually out of the ordinary to the public. Additionally, Caltrans will adhere to any revegetation requirements outlined by the USFS in the Special Use Permit required to work on Forest property. <i>Scenic Resource Evaluation and Visual Impact Assessment, October 2018</i></p>				
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 type="checkbox"/>	<input checked="" type="checkbox"/>



Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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## II. AGRICULTURE AND FOREST RESOURCES:

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

- |  |                          |                          |                                     |                                     |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?   | <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 checked="" type="checkbox"/> | <input type="checkbox"/>            |

At Location 2 a new 260 ft X 150 ft parking area will be created while decommissioning an existing parking area (see Figure 2, above). Creation of the new parking area would convert native forest land to a parking area to be used by visitors of the Inyo National Forest, however the small size of the parking area and proximity to the highway and existing parking areas results in a less than significant impact on forest land. *Draft Project Report, December 2018*

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

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

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project limits are not within a PM 10 non-attainment area and is therefore exempt from conformity analyses. A short-term degradation of mesoscale air quality can be expected due to exhausts of the required construction equipment. Dust levels are also expected to have a short-term impact and will be minimized by enforcement of Caltrans' standard dust control specifications. There are no known sensitive receptors (schools, hospitals, residences etc.) within close proximity to the project locations. Additionally, any impacts on air quality resulting from construction activities will be temporary. *Air, Noise, Water Quality and Hazardous Waste Study Memo, October 2018*

e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**IV. BIOLOGICAL RESOURCES:** Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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\*See expanded discussion after CEQA checklist. The project is not located in a coastal area under the jurisdiction of the National Marine Fisheries Service (NOAA Fisheries). Determinations based on *Natural Environment Study – Minimal Impacts (NESMI), November 2018*

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**V. CULTURAL RESOURCES:** Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Background research concluded that one archeological site was located within the project area limits (PAL). No resources were identified at or near Locations 1 or 2, and no surface artifacts were found at location 3. Field reviews by professionally qualified cultural staff were performed in May 2018 which confirmed the absence of resources at Locations 1 and 2, and no surface artifacts were found at Location 3. Due to previous studies indicating subsurface resources may be present at Location 3, an extended Phase I (XP-I) investigation was performed at Location 3 in July 2018 to confirm the presence or absence of subsurface archaeological deposits. Multiple shovel test pits were dug which revealed no significant archaeological or historical resources present in the PAL. As a result of the XP-1 investigation, it was confirmed that no Historical Resources are located within the PAL. No human remains are anticipated within the project footprint, however standard specifications for stop-work and mandatory notification protocol are included on every Caltrans project. *Historical Resources Compliance Report (HRCR), November 2018*

**VI. Energy:** Would the project

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**VII. GEOLOGY AND SOILS:** 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"/>

Locations 1 and 2 are not located within an Alquist-Priolo earthquake zone. Location 3 is located within a land parcel which has been identified as being within an earthquake fault zone, however the project site itself is not located on a mapped fault (see Appendix A). The project does not include building residences or other habitable structures, and the project area is currently used for recreational parking. The action of paving the parking area is not anticipated to increase the risk of fault rupture or expose a substantial number of new trailhead users to increased risk of seismic shaking.

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
*See explanation above				
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**VIII. GREENHOUSE GAS EMISSIONS:** Would the project:

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

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

Caltrans has used the best available information based to the extent possible on scientific and factual information, to describe, calculate, or estimate the amount of greenhouse gas emissions that may occur related to this project. The analysis included in the climate change section of this document provides the public and decision-makers as much information about the project as possible. It is Caltrans' determination that in the absence of statewide-adopted thresholds or GHG emissions limits, it is too speculative to make a significance determination regarding an individual project's direct and indirect impacts with respect to global climate change. Caltrans remains committed to implementing measures to reduce the potential effects of the project. These measures are outlined in the climate change section of the document.

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

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

No hazardous materials are known to exist at or near the project impact area. If excess soil is generated by the project, and soil must be disposed of off-site, it will first be tested for aerially deposited lead per applicable waste disposal laws and Caltrans' standard project specifications.

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? ☐ ☐ ☐ ☒

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

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

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? ☐ ☐ ☐ ☒

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

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

**X. HYDROLOGY AND WATER QUALITY:** Would the project:

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

All appropriate best management practices (BMPs) will be used as outlined in the National Pollutant Discharge Elimination System (NPDES) Statewide Storm Water Permit. Contamination of any surface water will be avoided, and disturbed soil area will be less than one acre per location. The awarded construction contractor will submit a Water Pollution Control Program (WPCP) for Caltrans' approval prior to construction. No 401 or 404 permits are required for the project. *Air, Noise, Water Quality and Hazardous Waste Study Memo, October 2018*



		Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
(i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
*See explanation IX-a, above.					
(iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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**XI. LAND USE AND PLANNING:** Would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Physically divide an established community?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XII. MINERAL RESOURCES:** Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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"/> |

**XIII. NOISE:** 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 type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) 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"/> |

**XIV. POPULATION AND HOUSING:** Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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"/> |

**XV. PUBLIC SERVICES:**

- 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:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### XVI. RECREATION:

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

The project will pave existing parking areas and create one new parking area (location 2). All locations are currently in use, and providing designated paved parking is expected to both improve user safety and minimize vehicles parking on vegetated areas. The number of visitors may increase slightly after the parking areas are paved, however the relatively small parking areas is unlikely to increase use to a level resulting in substantial physical deterioration to the recreational areas.

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

#### XVII. TRANSPORTATION: Would the project:

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	--------------

**XVIII. TRIBAL CULTURAL RESOURCES:** 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:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) 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 § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

\*Pursuant to Assembly Bill 52 (AB 52) requirements, notification letters were sent to representatives of the Big Pine Paiute Tribe on April 27, 2018. Based on the traditional and culturally affiliated geographic areas identified by the tribes who contacted the District in accordance with Public Resources Code § 21080.3.1(b), this project is located in an area identified as geographically affiliated with the Big Pine Paiute Tribe. No other tribes identified this geographic area under the code. No significant historic or tribal resources were identified within the project's impact area, and standard construction specification 14-2.03A, included on all Caltrans' projects, outlines protocol to follow in the event unexpected cultural or tribal resources are discovered during construction.

**XIX. UTILITIES AND SERVICE SYSTEMS:** Would the project:

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Minor earthwork and grading will be required to provide drainage for the paved parking areas and avoid water ponding on the pavement. Minor extensions of existing drainage systems may be needed but are not expected to cause significant environmental effects. *Draft Project Report, December 2018*

- |   |                          |                          |                                     |                                     |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c) 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 type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	--------------

There are no known sources of hazardous wastes or soil contaminants within the areas of construction. If excess soil is generated by the project which must be disposed of offsite, aerially deposited lead (ADL) testing will be required in accordance with standard Caltrans project specifications. Any wastes will be disposed of according to all applicable laws and regulations. *Air, Noise, Water Quality and Hazardous Waste Study Memo, October 2018*

**XX. WILDFIRE** If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE**

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) 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 type="checkbox"/> | <input checked="" type="checkbox"/> |



## **Additional Explanations for Questions in the Impacts Checklist**

### *IV. Biological Resources (checklist question a)*

#### *Threatened and Endangered Species*

##### ***Affected Environment***

A Biological Study Area (BSA) was delineated to ensure all potential species and habitats present in the project impact area, access routes, and staging areas were properly surveyed to best assess potential impacts of the project. The BSA also included buffer areas outside of the project footprint where other disturbance or human activity could occur during construction. Sensitive-status species lists from California Department of Fish and Wildlife (CDFW), California Native Plant Society (CNPS), US Fish and Wildlife Service (USFWS), and US Forest Service (USFS) were reviewed to determine the potential for sensitive-status individual plants or animals or their suitable habitat to be present within or adjacent to the BSA. Review and coordination with the USFS Botanist and Wildlife Biologist occurred, and focused vegetation and wildlife surveys were conducted in July 2018 by a Caltrans biologist. One sensitive-status species, the Mono milk vetch, was observed during the survey at Location 3. The Mono milk vetch is a CNPS 1B.2 rare plant and therefore meets the criteria for state listing. No sensitive-status species were discovered at Locations 1 or 2.

The project includes removal of shrubs and trees which may provide nesting habitat for birds protected under the Migratory Bird Treaty Act of 1918 and California Fish and Game Code 3503, 3513, and 3800; however no nesting birds were observed during the July 2018 field survey. Similarly, Sierra marten and Northern goshawk were not observed during field surveys but have the potential to be present within the project area. Invasive plants were observed within the BSA and controlling their spread is a concern of the US Forest Service.

##### ***Environmental Consequences***

The Mono milk vetch plant identified during field surveys was mapped within the BSA at Location 3, and it was determined that project activities have the potential to impact the plant. Measures (outlined below) will be implemented to avoid impacting the Mono milk vetch, nesting migratory birds, special status species which were not found but could occur in the area, and limit the spread of invasive plants.

A Natural Environment Study (Minimal Impacts) was completed in November 2018 and found the project would have:

- No Effect on any federally-listed threatened or endangered species as none were present in the project area
- No species listed under the CA Endangered Species Act were present within the project area
- No essential fish habitat is present within the BSA
- No jurisdictional wetlands, Waters of the US, or Waters of the State are present in the BSA

### ***Avoidance, Minimization, and/or Mitigation Measures***

The following avoidance and minimization measures are included as environmental commitments for the project. The project will have a less than significant effect on biological resources.

#### Mono Milk Vetch

- If the project is constructed during or after the blooming period (June-August), pre-construction surveys will be conducted to ensure new plants are not present within the project impact area. If pre-construction surveys cannot be completed, vegetated areas will be avoided all together to minimize any potential impacts to previously-undocumented plants.
- High-visibility orange fencing will be installed between the project area and the known Mono milk vetch to segregate construction impacts from the plant.
- The Caltrans project biologist or environmental construction liaison will be onsite to oversee the installation of fencing to ensure it is installed in the proper location and minimize trampling. No staging or construction activities will occur beyond the fencing.

#### Nesting Birds/Nesting Habitat

- Pre-construction nesting bird surveys will be conducted at least 48 hours prior to any work being done regardless of time of year.
- If a nest is found within the project impact area, an appropriate buffer approved by the project biologist will be implemented to exclude work around the nest until nesting activities have completed. Biological monitoring may

also be required, as determined by the project biologist, if active nests are found within or adjacent to the project areas.

### Invasive Species

In compliance with Executive Order 13112 and Federal Highways Administration (FHWA) guidance, avoidance measures will be implemented to reduce the introduction and spread of invasive species by adhering to standard best management practices and including non-standard special provision 14-6.05. This provision requires the contractor to clean all equipment and vehicles prior to entering the project site. An Invasive Plant Report was submitted to the USFS.

### Sierra Marten

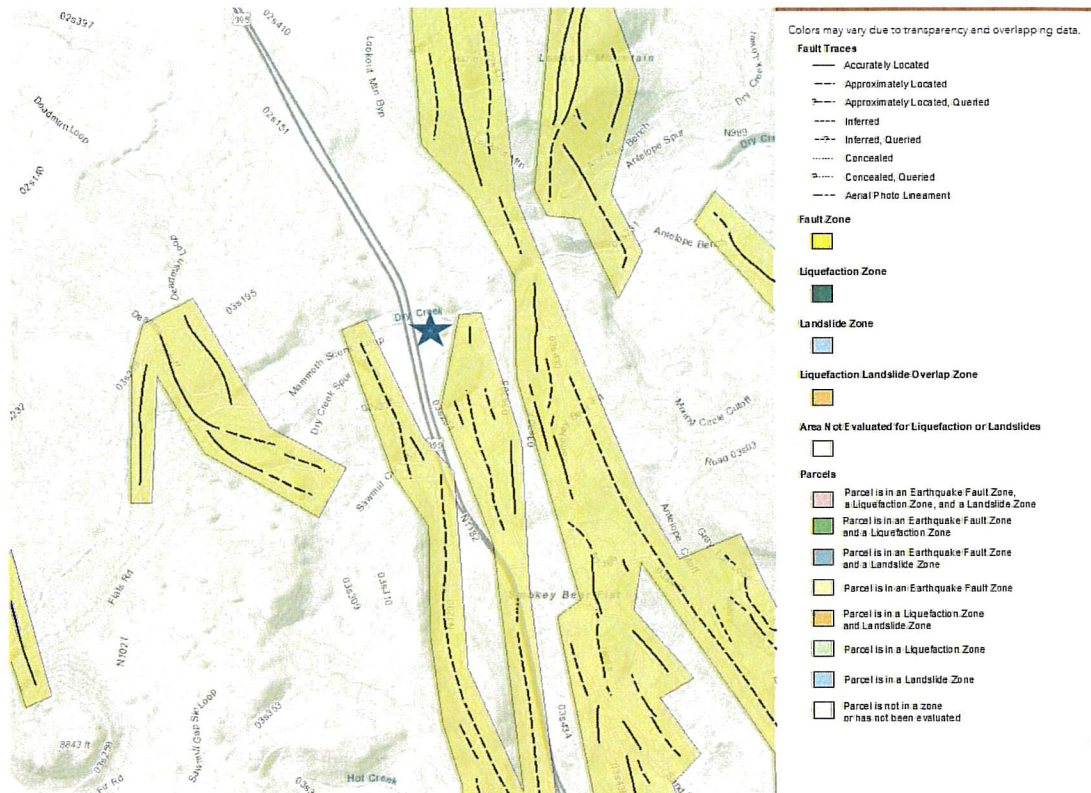
Pre-construction surveys will be conducted within two weeks of construction start to ensure no Sierra marten are present within the BSA. Remote wildlife cameras may be placed on trees to detect any marten activity within the BSA.

If Sierra marten are observed within the BSA during construction activities, the contractor will stop work and consult with the project biologist for an appropriate protective buffer. Consultation with CDFW and USFS may occur if additional measures need to be implemented during construction to exclude marten from the project area.

### Northern Goshawk

- Pre-construction nesting bird surveys will be conducted at least 2 weeks prior to the start of construction, regardless of the time of year, to ensure any birds nesting outside of the normal nesting season are identified
- If a goshawk nest is found within the project impact area, monitoring by a qualified biologist may be required, as determined by the project biologist, to avoid impacting the birds. Monitoring may be required until nesting activities have completed, and the bird nestling has fledged and left the area
- If a nest is found outside of the project impact area, but near construction activities, a no-work buffer and species monitoring may be implemented at the direction of the project biologist. If project activities appear to not disrupt nesting activities, the project biologist may allow construction activities to resume.

# Appendix A Earthquake Map



Location 3 (blue star) near identified fault zone. Map obtained from CA Department of Conservation Earthquake Hazards Zone Application (EQ Zapp), accessed online December 2018 at <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

## **Appendix B** Comments and Responses

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The Draft Initial Study with Proposed Negative Declaration (ISND) was approved by District management on December 13, 2018. A Notice of Intent to file the ISND was published in the Mammoth Times newspaper on December 10, 2018. Copies of the draft document and public notices were posted onsite at the Caltrans District 9 Office, the Mammoth Lakes Post Office, the Mammoth Lakes Government Building, and the June Lake Post Office on December 14, 2018. The public comment period was open for 30 days; from December 14, 2018 through January 13, 2019. During this period one comment was received from a government agency, and no comments were received from members of the public. The Native American Heritage Commission (NAHC) delivered their comment letter via email and hardcopy on December 26, 2018. Their comments centered around CEQA procedure and documentation and did not result in changes to the project scope or design. Their letter did not state opposition to the project as proposed in the draft environmental document. No public hearings were requested by the public during the open comment period, and none were held. The following pages include a copy of the Notice of Intent (posted online, at various locations near the project areas, and in the newspaper), as well as the comments received from NAHC and Caltrans' responses.



## Public Notice

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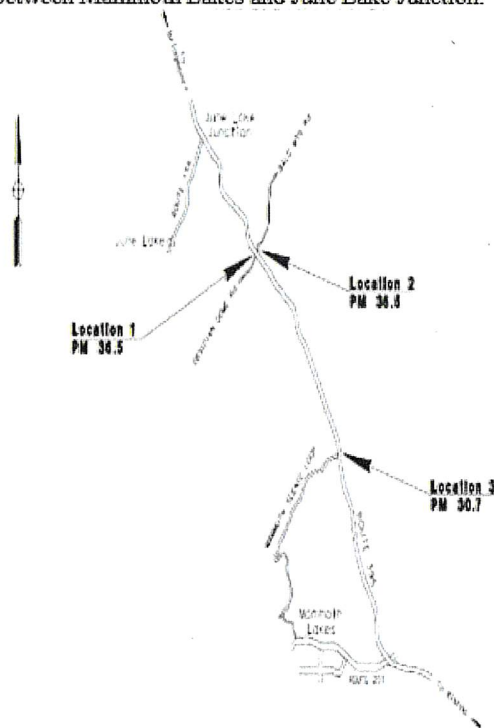


### Notice of Intent to Adopt a Negative Declaration Study Results Available Changes Proposed for Route 395

#### Do you want a public hearing on changes proposed for Route 395?

##### What's Being Planned:

The California Department of Transportation (CALTRANS) is considering the "Mono Winter Access Parking" project, which proposes to pave three locations to provide parking for US Forest Service trails, along U.S. 395 in Mono County between Mammoth Lakes and June Lake Junction.



**Why This Ad:** CALTRANS has studied the effects this project may have on the environment. Our studies show it will not significantly affect the quality of the environment. The report that explains why is called a proposed Negative Declaration (ND) and Initial Study. This notice is to tell you of the preparation of the report, its availability for you to read and offer comments, and to offer the opportunity for a public hearing.

**What's Available:** Maps, the Proposed ND, and the Initial Study for the Mono Winter Access Parking project are available for review and copying on weekdays at the CALTRANS District Office located at: 500 S. Main Street, Bishop 93514; Mammoth Lakes Post Office at 3330 Main Street, Mammoth Lakes, CA 93546; the Mammoth Lakes Government Building at 437 Old Mammoth Road Suite 230, Mammoth Lakes, the June Lake Post Office at 2747 Boulder Drive, June Lake CA 93529, and on our website:

<http://www.dot.ca.gov/d9/projmgmt/projects.html>

**Where You Come In:** Do you have any comments about processing the Mono Winter Access Parking project with an ND and/or the Initial Study? Do you disagree with the findings of our study as set forth in the Proposed ND? Would you like a public hearing? Would you care to make any other comments on the project? Please submit your comments or request for a public hearing in writing **no later than January 13, 2018** to Angela Calloway, Environmental Office Chief - Caltrans, at 500 South Main Street, Bishop, CA 93514. The date we will begin accepting comments is **December 14, 2018**. If there are no major comments, CALTRANS will proceed with the project's design.

For more information about this study or any transportation matter, call CALTRANS at 1-760-872-0601. Individuals who require documents in alternative formats are requested to contact the District 9 Public Affairs Office at 1-760-872-0603. TDD users may contact the California Relay Service TDD line at 1-800-735-2929, or Voice Line at 1-800-735-2922.

## Comment Received from the Native American Heritage Commission

STATE OF CALIFORNIA

Edmund G. Brown Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department  
1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691  
Phone (916) 373-3710  
Fax (916) 373-5471



December 26, 2018

Bradley Bowers  
California Department of Transportation, District 9  
500 S. Main Street  
Bishop, CA 93514

Also sent via e-mail: [Bradley.bowers@dot.ca.gov](mailto:Bradley.bowers@dot.ca.gov)

Re: SCH# 2018121043, Mono Winter Access Parking Project; Community of Mammoth Lakes, Mono County, California

Dear Mr. Bowers:

The Native American Heritage Commission (NAHC) has reviewed the Negative Declaration/Initial Study prepared for the project referenced above. The review included the Project Description; and the CEQA Environmental Checklist, section V, Cultural Resources prepared by the California Department of Transportation, District 9. We have the following concerns:

1. There is no Tribal Cultural Resources section or subsection in the Initial Study / Environmental Checklist as per California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>. Questions of Significance for Tribal Cultural Resources are not addressed.
  2. There is no documentation of **government-to-government consultation by the lead agency** under AB-52 with Native American tribes traditionally and culturally affiliated to the project area as required by statute. The NAHC recommends that consultation outreach to the tribes on the NAHC list is consistent with Best Practices. Please refer to: [http://nahc.ca.gov/wp-content/uploads/2015/04/AB52TribalConsultationRequirementsAndBestPractices\\_Revised\\_3\\_9\\_16.pdf](http://nahc.ca.gov/wp-content/uploads/2015/04/AB52TribalConsultationRequirementsAndBestPractices_Revised_3_9_16.pdf)
- 3
- Mitigation for inadvertent finds of Cultural Resources and Tribal Cultural Resources is missing or incomplete. Standard mitigation measures should be included in the document. Sample mitigation measures for Tribal Cultural Resources can be found in the CEQA guidelines at [http://opr.ca.gov/docs/Revised AB 52 Technical Advisory March 2017.pdf](http://opr.ca.gov/docs/Revised_AB_52_Technical_Advisory_March_2017.pdf)

Please contact me at [gayle.totton@nahc.ca.gov](mailto:gayle.totton@nahc.ca.gov) or call (916) 373-3714 if you have any questions.

Sincerely,

*Gayle Totton*

Gayle Totton, B.S., M.A., Ph.D  
Associate Governmental Project Analyst

Attachment

cc: State Clearinghouse

### **Caltrans' Responses to NAHC Comment Letter**

Thank you for your interest in the Mono Winter Access Parking Project and for taking the time to comment on the Draft Environmental Document. Please see below for our responses to your comments, which are numbered according to your letter.

1. The Tribal Cultural Resources section of the CEQA checklist has been updated for the final environmental document, and now reflects the current Caltrans template (updated 1/17/2019). Vertical lines in the left margin throughout this final document indicate changes or updates from the draft document.
2. There was no request from any Tribe for government-to-government consultation under AB 52. Notification letters were sent to representatives of the Big Pine Paiute Tribe on April 27, 2018 which included a project description and outlined the opportunity to request consultation under AB 52. Language that reflects this has been inserted into the final environmental document on pages 1 and 15.
3. Due diligence was taken to identify any cultural or tribal cultural resources which could be present within the project impact area. These efforts were summarized in the draft environmental document CEQA checklist item V "Cultural Resources". Standard specification (14-2.03A), the protocol for notification and recovery efforts in the event of unanticipated discovery of resources or remains, is included on every Caltrans project and as such does not meet the criteria of "mitigation" under CEQA. For brevity, Caltrans' standard measures and protocols are not outlined individually in draft or final environmental documents.

# Appendix C Environmental Commitments Record

## Environmental Commitments Record for EA 09-37300 / ID 0917000070

Last updated 12/4/2018

MONO WINTER ACCESS PARKING

EP: Bradley Bowers

760-872-2331

MNO-395-0.000/0.000

CL:

Current Project Phase: 0,1

RE:

Permits							
Permit	Agency	Date Submitted	Date Received	Expiration	Requirements Completed Name	Requirements Completed Date	Comments
Commitments							
Task and Brief Description	Source	SSP/ NSSP	Responsible Staff	Action to Comply	Task Completed	Remarks/Due Date	
<b>Pre-Construction</b>							
<b>Biology</b>							
Pre-construction nesting bird surveys: Pre-construction nesting bird surveys will be conducted at least 48 hours prior to any work being done regardless of time of year as species nesting times vary within and outside of the normal nesting period. If nests are found within 250' (songbirds) or 500' (raptors) of the PIA, a monitor may be required for work to be conducted within these buffers. A no-work buffer may be implemented if the Department Biologist determines it necessary. SSP 14-6.03A	Env Doc	SSP	Biologist; RE	Notify Biologist 30 days prior to construction start	Signature _____ Date _____		
Pre-construction Northern goshawk (NOGO) surveys: Pre-construction NOGO surveys will be conducted at least 2 weeks prior to any work being done regardless of time of year as species nesting times vary within and outside of the normal nesting period. If a NOGO nest is found within the PIA, construction monitoring or a 500 foot no-work buffer may be implemented as determined by the project Biologist to reduce impacts caused by construction until nesting season has finished, or nesting activities have completed and the bird nestling has fledged and left the area. SSP 14-6.03A	Env Doc	SSP	Biologist; RE	Notify Biologist 30 days prior to construction start	Signature _____ Date _____		
Pre-construction plant surveys: If the project occurs during or after blooming season for Mono milk vetch (June-August), then pre-con surveys will be conducted to ensure no additional milk vetch are within the PIA. If pre-construction surveys cannot be completed, avoidance of impacting vegetated areas should minimize any potential impacts to previously undocumented plants.	Env Doc	n/a	Biologist; RE	Notify Biologist 30 days prior to construction start	Signature _____ Date _____		
Pre-construction Sierra marten surveys: Pre-construction	Env Doc	SSP	Biologist; RE	Notify Biologist 30 days prior			

Page 1

# Environmental Commitments Record for EA 09-37300\_ / ID 0917000070

Last updated 12/4/2018

## MONO WINTER ACCESS PARKING

MNO-395-0.000/0.000

Current Project Phase: 0,1

EP: Bradley Bowers

760-872-2331

CL:

RE:

Task and Brief Description	Source	SSP/ NSSP	Responsible Staff	Action to Comply	Task Completed	Remarks/Due Date
surveys will be conducted within two weeks of construction start to ensure no Sierra marten are present within the BSA prior to construction activities commencing. Remote wildlife cameras may be set up on trees (un-baited) to detect any marten activity within the BSA. If an active maternal den is found within 500' of the PIA, monitoring may be required or a no-work buffer may be implemented. If the maternal den is located in a tree that is planned for removal, then tree removal may be avoided or postponed until the denning activity has ended. A biological monitor or Caltrans staff will check the status of the denning marten to determine when a no-work buffer may be lifted. SSP 14-6.03A				to construction start	Signature Date	
<b>Hazardous Waste</b>						
If excess soil is generated by the project, ADL testing will be required	Env Doc		DE/RE/PM	When design engineer calculates out and fill amounts, they need to notify CT Environmental Coordinator if excess soil will be produced. Haz Waste engineer will then contract and schedule ADL test	Signature Date	
<b>Stormwater</b>						
Contractor will produce a Water Pollution Control Program (WPCP) for Caltrans' approval prior to construction.	Env Doc		Contractor/RE/PM	Specification for WPCP will be in contracts out to bid. Contractor will write WPCP and submit for CT approval	Signature Date	
<b>Construction</b>						



# Environmental Commitments Record for EA 09-37300 / ID 0917000070

Last updated 12/4/2018

## MONO WINTER ACCESS PARKING

MNO-395-0.000/0.000

Current Project Phase: 0,1

EP: Bradley Bowers

760-872-2331

CL:

RE:

Task and Brief Description	Source	SSP/ NSSP	Responsible Staff	Action to Comply	Task Completed	Remarks/Due Date
<b>Biology</b>						
Contractor-supplied Biologist: A CSB may be required to conduct monitoring for nesting birds or other special-status species if found within buffer distances of the PIA during pre-construction surveys. The CSB will monitor all active nests or dens until nesting and denning activities have concluded or the Department Biologist deems it unnecessary. CSB will submit weekly monitoring reports to Department Biologist. SSP 14-6.03D(1)	Env Doc	SSP	Biologist; RE; Contractor	Contractor will submit qualifications of CSB within 7 days of contract acceptance for review by Biologist	Signature Date	
ESA Fencing: ESA fencing will be required at Location 3 to avoid impacts to rare Mono milk vetch plants. A monitor or CT staff will monitor fencing installation to ensure proper placement. SSP 14-1.02	Env Doc	SSP	Biologist; RE; Contractor	Biologist, Monitor or CT Enviro Staff must be present for installation of ESA fencing; notify Biologist 30 days prior to construction start	Signature Date	
Invasive Plant NSSP: Implement Invasive plant NSSP to ensure reduction in spread of noxious and invasive plant species during construction. NSSP 14-6.05	Env Doc	NSSP	Biologist; RE; Contractor	RE will ensure Contractor will implement NSSP requirements and provide any documentation needed	Signature Date	
Nesting Bird Construction Windows: If possible, construction windows may be implemented during nesting bird season (Feb. 15- Sept. 30). If work can be done outside of the nesting season, it is less likely that there would be impacts to nesting birds and less likely there would be costly delays to the project, especially for vegetation and tree removal.	Env Doc	n/a	Biologist; RE	RE would enforce construction windows to not allow work during nesting season; notify Biologist 30 days prior to construction start	Signature Date	
Sierra marten: If Sierra marten are observed within the BSA during construction, the contractor may stop work within 500 feet of the marten until it moves out of the area on its own. The contractor will notify the project Biologist or Environmental Construction Liaison if this occurs regularly. If needed, the project Biologist may consult with USFS and CDFW about additional measures to implement if needed. SSP 14-6.03A	Env Doc	SSP	Biologist; RE; ECL	RE will notify Biologist or ECL if repeated sightings of Sierra marten occur during construction	Signature Date	