

MONO COUNTY
GENERAL PLAN LAND USE AMENDMENTS
Integration of Land Use Regulations into the General Plan
Amendments to Land Use Element
Countywide Revision of Land Use Maps

Final Environmental Impact Report (FEIR)
Section I Environmental Analysis & Mitigation Measures
Section II Master Environmental Assessment (bound separately)

SCH # 98122016

November 2000

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SUMMARY--GENERAL PLAN LAND USE AMENDMENT EIR

● **Project Description**

The proposed General Plan Land Use Amendments include the following three components:

1. Integration of the Land Use Regulations (i.e. Zoning and Development Code) into the General Plan.

- Includes the development of a single set of land use designations to replace the current General Plan Land Use Designations and Zoning Districts. The purpose of this is to reduce the confusion resulting from the use of the current two-tiered system and to ensure consistency as required by State law.
- Also includes the incorporation of the current zoning regulations into the Land Use Element of the General Plan as a separate section titled Land Use Regulations. The new name, "Land Use Regulations", is intended to indicate the close relationship between these implementing regulations and the policies contained in the General Plan.
- Changes to the Zoning Code, including the land use designations, are minimal and are intended to clarify existing language, amend existing language to ensure consistency with General Plan policies and State planning law, and to reflect minor changes recommended during community planning meetings

2. Amendments to the Land Use Element.

- Includes amendments to the land use designations, resulting from the proposed integration of the current General Plan Land Use Designations and Zoning Districts.
- Includes amendments to the land use maps to reflect the new designations. Substantive changes also include the establishment of minimum lot sizes for specific parcels or areas of parcels, corrections of existing designations, and revisions based on recommendations from community planning meetings.
- Table 3 in the Land Use Element, Buildout by Planning Area and Land Use Designations, has been amended to reflect the changes shown on the land use maps.
- Policies for the Bodie Hills Planning Area have been included.

3. Extensive Revisions to the Land Use Maps.

- The land use maps have been extensively revised to provide greater detail for all areas of the county. The revisions are intended to ensure consistency with the policies of the Mono County General Plan Update adopted in 1993 and to implement the new land use designations. In many cases, many of the revisions are changes in name only, a switch from the old land use designation to the proposed new integrated land use/zoning designation. Substantive changes include the establishment of minimum lot sizes for specific parcels or areas of parcels, corrections of existing designations, and revisions based on recommendations from community planning meetings.

● **Significant Changes Resulting from the Proposed Land Use Amendments**

Significant changes in land use will not occur as a result of the Integration of the Land Use Regulations into the General Plan or from the resulting Amendments to the Land Use Element. The intent behind each of those actions is to minimize change by focusing on clarifying existing language, eliminating existing inconsistencies and correcting previous oversights and errors.

The following significant changes will occur as a result of the proposed Revisions to the Land Use Maps:

1. Increase in Overall Private Land Acreage

The proposed Countywide Revision of the Land Use Maps will result in an overall increase in private land acreage (+779 acres, less than 1 percent of the total private land acreage), increasing the amount of land available for development.

2. Overall Reduction in Total Potential Buildout

The proposed Countywide Revision of the Land Use Maps will result in an overall reduction of 4,166 units in the total potential buildout (13 percent of the total existing potential buildout) .

3. Increase in Buildout in 5 Planning Areas

The proposed Countywide Revision of the Land Use Maps will result in an increase in buildout in the following planning areas: Antelope Valley, Bridgeport Valley, Bodie Hills, Mono Basin North, and Chalfant Valley.

4. Decrease in Buildout in 6 Planning Areas

The proposed Countywide Revision of the Land Use Maps will result in a decrease in buildout in the following planning areas: Mono Basin South, Mammoth Vicinity, Long Valley, Wheeler Crest, Benton Valley, Outside Planning Areas.

5. Increase in Buildout in 3 Land Use Designations

The proposed Countywide Revision of the Land Use Maps will result in an increase in buildout in the following land use designations: Multiple Family Residential-Low (MFR-L), Mixed Use (MU), Agriculture (AG).

6. Decrease in Buildout in 10 Land Use Designations

The proposed Countywide Revision of the Land Use Maps will result in a decrease in buildout in the following land use designations: Low density residential (ER, RR, RMH), Single Family Residential (SFR), Multiple Family Residential-Moderate and High (MFR-M and H), Resource Management(RM), Open Space (OS)--LADWP, WRID, and Sierra Pacific Power.

● **Issues and Concerns Regarding the Proposed Project**

The only issues identified for the proposed project were to:

1. Minimize change when integrating the General Plan Land Use Designations with the Zoning Districts and integrating the Zoning and Development Code (Land Use Regulations) into the Land Use Element.
2. Clarify existing language in the Land Use Designations and Land Use Regulations, including any state or federal requirements.
3. Ensure consistency in the application of the land use designations on the land use maps.
4. Correct previous oversights and errors in the Land Use Designations and Land Use Maps.

No issues were identified during the public scoping process for the EIR.

● **Environmental Analysis--Discussion**

The Environmental Analysis section of the document discusses the following:

1. Existing environmental setting [found in the **Mono County Master Environmental Assessment (MEA)**, bound separately].
2. Potential environmental impacts from the proposed land use amendments.
3. Proposed mitigation measures. General Plan (GP) policies serve as mitigation measures for the project.
4. Proposed project alternatives.

● **Environmental Analysis--Conclusions**

The potential environmental impacts and mitigation measures resulting from the proposed amendments remain the same as those identified in the 1993 General Plan EIR. The extent of the impacts would be less under the proposed amendments since the overall density under the amendments is less than that which is currently allowed by the existing General Plan. In addition, the specific nature of the amendments would tend to reduce these impacts, e.g. reductions in the amount of residential acreage and increases in the amount of agricultural acreage would reduce the extent of several of the identified effects.

The proposed amendments shift potential development from one area of the county to another and change the maximum allowable density in various areas throughout the county. The overall effect of those changes will be to change the extent of potential environmental impacts in various areas throughout the county.

Unavoidable Impacts, Irreversible Impacts, Growth Inducing Impacts, and Cumulative Impacts will also be the same as those identified in the 1993 General Plan EIR but the extent of those impacts would also be less under the proposed amendments since the overall density under the amendments is less than that which is currently allowed by the existing General Plan.

● **Alternatives Analysis**

The Impact Summary section of the document discusses project alternatives, including a No Project Alternative, a Proposed Project Alternative and a Lower Density Development Alternative. Other alternatives, such as a higher density alternative or a no growth alternative, were considered but were considered unfeasible since they would not meet the project goal and/or would not avoid or substantially lessen any of the significant effects of the project.

The Proposed Project Alternative is identified as the preferred alternative because it best achieves the project objective while reducing the potential maximum buildout in the General Plan and reducing significant environmental effects resulting from that potential buildout.

● **Comments and Responses**

Twelve comments were received. Three comments were from State agencies; one was from an organization; 8 were from individuals. Chapter VI contains the comments on the 1999 Mono County Land Use Element Amendments and responses to those comments.

● **Changes to DEIR Resulting from Comments**

1. Land Use Element, Objective A, Policy 2, Action 2.1, which requires necessary services and facilities to be available or to be provided as a condition of approval for proposed projects, has been amended to specifically include transportation infrastructure. This was a suggestion from Caltrans.
2. The DEIR contains an error concerning proposed designations for the Bodie Hills. The second bulleted item under Bodie Hills on p. 22 of the DEIR should read as follows:
 - Most land was designated Resource Management (RM) in the 1993 General Plan. It is now designated Rural Resort (155 acres) and Agriculture (14,251 acres).

Table 3--Bodie Hills, on p. 43 of the DEIR, has also been corrected to show that the only designations for the Bodie Hills are RU and AG.

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Other figures throughout the DEIR have been changed as a result of correcting the above error.

3. Land Use Maps 41-44, which cover the Bodie Hills Planning Area, show how many Development Credits will be allowed for each parcel designated AG. The legend for these maps will be amended to indicate that the numbers shown in the AG designated parcels (i.e. 5 dc, etc.) indicate the number of Development Credits allowed for each parcel. This was done to correct an oversight.
4. The total countywide decrease in buildout was erroneously noted as 4,044 in several places in the text of the DEIR. This has been corrected to indicate the proper figure of 4,166.

I. INTRODUCTION

PROPOSED LAND USE AMENDMENTS

The proposed General Plan Land Use Amendments include the following components:

1. **Integration of the Land Use Regulations (i.e. Zoning and Development Code) into the General Plan.**
 - Includes the development of a single set of land use designations to replace the current General Plan Land Use Designations and Zoning Districts. The purpose of this is to reduce the confusion resulting from the use of the current two-tiered system and to ensure consistency as required by State law.
 - Also includes the incorporation of the current zoning regulations into the Land Use Element of the General Plan as a separate section titled Land Use Regulations. The new name, "Land Use Regulations", is intended to indicate the close relationship between these implementing regulations and the policies contained in the General Plan.
 - Changes to the Zoning Code, including the land use designations, are minimal and are intended to clarify existing language, amend existing language to ensure consistency with General Plan policies and State planning law, and to reflect minor changes recommended during community planning meetings
2. **Amendments to the Land Use Element.**
 - Includes amendments to the land use designations, resulting from the proposed integration of the current General Plan Land Use Designations and Zoning Districts.
 - Includes amendments to the land use maps to reflect the new designations. Substantive changes also include the establishment of minimum lot sizes for specific parcels or areas of parcels, corrections of existing designations, and revisions based on recommendations from community planning meetings.
 - Table 3 in the Land Use Element, Buildout by Planning Area and Land Use Designations, has been amended to reflect the changes shown on the land use maps.
 - Policies for the Bodie Hills Planning Area have been included.
3. **Extensive Revisions to the Land Use Maps.**
 - The land use maps have been extensively revised to provide greater detail for all areas of the county. The revisions are intended to ensure consistency with the policies of the Mono County General Plan Update adopted in 1993 and to implement the new land use designations. In many cases, many of the revisions are changes in name only, a switch from the old land use designation to the proposed new integrated land use/zoning designation. Substantive changes include the establishment of minimum lot sizes for specific parcels or areas of parcels, corrections of existing designations, and revisions based on recommendations from community planning meetings.

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PUBLIC REVIEW PROCESS

The Mono County Planning Department held meetings in all communities to discuss the proposed revisions to the land use designations and the land use maps. Notices concerning these meetings were sent to all property owners. The Planning Department also held Open House Meetings in all communities at which a planner was present to meet property owners and discuss specific concerns relating to the land use designation and map revisions. Notices of these meetings were also sent to all property owners.

AUTHORITY FOR ENVIRONMENTAL IMPACT REPORTS

CEQA requires lead agencies to prepare an EIR in cases where a project may have a significant effect on the environment. As defined by CEQA (Guidelines Section 15121), the purpose of an EIR is to:

- Inform public agency decision-makers and the public generally of the significant environmental effects of a project;
- Identify possible ways to minimize the significant effects; and
- Describe reasonable alternatives to the project.

The Final Environmental Impact Report (FEIR) consists of the Environmental Analysis & Mitigation Measures, and public comments and responses (Section I) and the Master Environmental Assessment (MEA) (Section II--bound separately). The MEA functions as the environmental setting for the EIR. The Environmental Analysis Section identifies potential significant environmental impacts resulting from implementation of the proposed General Plan Land Use Amendments and identifies general plan policies and programs which mitigate those potential impacts. The Environmental Analysis Section also contains an alternatives analysis which compares the impacts resulting from higher and lower growth scenarios than the level of growth resulting from the proposed General Plan Land Use Amendments. The EIR Comment section contains all comments received on the EIR and responses to those comments.

General Plans are by nature broad and comprehensive. As a result, the impacts identified and analyzed in this EIR are generalized and emphasize secondary impacts that can be expected to follow from adoption of the proposed amendments. CEQA recognizes that the level of analysis which is reasonably feasible in a General Plan EIR will, from necessity, be more general than that which is reasonably feasible in a project-specific EIR; "the degree of specificity in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR" (CEQA Guidelines Section 15146). The proposed General Plan Land Use amendments assign land use designations to private lands in the County; they do not specify how or where development may occur on those lands. It would be speculative to include more detailed analysis in the DEIR; an EIR is not required to be speculative in its analysis [CEQA Guidelines Section 15126.6 (c)].

REQUIRED CONTENTS OF AN EIR

The CEQA Guidelines require that EIRs contain specific elements (Guidelines Sections 15122-15132). The location of each required element is noted below:

<u>EIR ELEMENT</u>	<u>LOCATION IN EIR</u>
Table of Contents.....	p. i
Summary.....	p. 1
Project Description.....	p. 9
Environmental Setting..... (Master Environmental Assessment , bound separately)	MEA
Environmental Analysis.....	p. 26
Significant Environmental Effects and Proposed Mitigation Measures.....	p. 27
Project Alternatives.....	p. 38
Effects Not Found to be Significant.....	p. 36
Significant Unavoidable Environmental Effects.....	p. 36
Significant Irreversible Environmental Changes.....	p. 36
Growth Inducing Impacts.....	p. 37
Cumulative Impacts.....	p. 38
References (including Organizations and Persons Contacted).....	p. 97 and MEA

INTENDED USES OF THE EIR

Public Agencies Using the EIR

The following agencies are expected to use the EIR in their regulatory and approval programs:

Federal

U.S. Army Corps of Engineers. Placement of fill material into "waters of the United States" (404 permit process).

U.S. Environmental Protection Agency. Oversight of 404 permit program implemented by the U.S. Army Corps of Engineers.

U.S. Fish and Wildlife Service. Endangered Species Act enforcement and regulation.

U.S. Forest Service. Approval of special use permits and land exchanges for future community expansion. Recreational facility expansion approvals. Management of lands surrounding community areas. Management of mine reclamation.

U.S. Bureau of Land Management. Approval of special use permits and land exchanges for future community expansion. Recreational facility expansion approvals. Management of lands surrounding community areas. Management of mine reclamation.

State

Department of Transportation. Rights-of-way review and approval. Access and safety considerations on state and federal highways.

Department of Fish and Game. Stream alteration permits. Wildlife mitigation planning.

Department of Forestry. Implementation of fire safe regulations. Regulation of timber cutting on private lands.

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Lahontan Regional Water Quality Control Board. Water quality certifications and approvals, including monitoring.

State Water Resources Control Board. Water rights approvals, if new rights or changes are required.

Great Basin Unified Air Pollution Control District. Approval of building emissions and air quality monitoring.

State Lands Commission. Lake and streambed protection.

Local

Mono County Airport Land Use Commission. Airport Land Use Plans and associated airport vicinity projects.

Mono County Energy Management Department. Project development approvals.

Mono County Local Agency Formation Commission. Sphere of Influence amendments, annexations and other local governmental agency boundary changes.

Mono County Local Transportation Commission. Regional Transportation Plan and associated transportation projects.

Mono County Planning Department. County land use map amendments, various planning permit approvals.

Mono County Public Works Department. Grading permits and construction approvals. Road design and right-of-way approvals. Solid waste and sewage system design approvals.

Mono County Planning Commission. Approval of various planning permits.

Various Special Districts. District capital improvements and facility planning.

Permits and Approvals Required to Implement the Project

Additional permits and approvals are not required to implement the adoption of the proposed General Plan Land Use Amendments. Future site specific projects consistent with the policies and maps in the General Plan will require additional permits and approvals and additional environmental review.

Related Environmental Review and Consultation Requirements

Additional environmental review is not required to implement the adoption of the proposed General Plan Land Use Amendments.

II. PROJECT DESCRIPTION

PROJECT LOCATION AND SETTING

Mono County is located on the eastern slope of the Sierra Nevada in the central portion of the state, east of San Francisco and south of Lake Tahoe (see Figure 1, Location Map--Mono County). The county is a long, narrow strip of land--108 miles at its greatest length, 38 miles in average width, and 3,103 square miles in area--bounded to the west by the Sierra crest and to the east by the Nevada state line. Although there are several mountain ranges in and adjacent to the county, the Sierra Nevada dominates the landscape--the predominant feeling throughout the county is one of space and panoramic views opening eastward from the Sierra.

Human use and development of the area has been influenced by its isolation and the difficulty of access. Access remains limited to one main transportation route, U.S. Highway 395, which runs through the county along the foot of the Sierras for approximately 120 miles. By car, Los Angeles is approximately 350 miles south on Hwy. 395, Reno, Nevada, is 160 miles north on Hwy. 395, and the San Francisco Bay Area is approximately 300-350 miles west on various routes connecting to Hwy. 395. Two highways, S.R. 167 and U.S. 6, provide access to Nevada from the central and southern portions of the county. Access both to the east and the west may be closed in winter due to snow--Hwy. 395 then becomes the only access to and through the county.

Mono County is rural and sparsely settled, with a population of 9,956 in the 1990 Census. One half of the county's population (approximately 4,800 people) lives in the Town of Mammoth Lakes, the only incorporated community in the county. The remainder of the population lives in a number of small communities scattered throughout the county. Approximately 94 percent of the county is public or quasi-public land administered by the U.S. Forest Service, the Bureau of Land Management, the State of California, or the Los Angeles Department of Water and Power. Most of the privately owned land in the county is situated along the base of the Sierra Nevada range in the communities of Topaz, Coleville, Walker, Bridgeport, Mono City, Lee Vining, June Lake, Mammoth Lakes, Long Valley, McGee Creek, Hilton Creek/Crowley Lake, Aspen Springs, Sunny Slopes and Wheeler Crest/Paradise. Additional private lands are located on the western flank of the White Mountains in the communities of Benton, Hammil and Chalfant, and in the extreme southeastern corner of the county in the Oasis area. Numerous pockets of private lands surrounded by federal lands are scattered throughout the County.

PROJECT OBJECTIVE

The purpose of the proposed General Plan Land Use Amendments is to a) provide one integrated document which governs land use in Mono County, and b) ensure consistent application of the policies and regulations contained in that document. Integration of the existing **Zoning and Development Code** with the **General Plan Land Use Element** will provide policy direction and implementing regulations for land use in Mono County in one document. This will reduce the confusion resulting from the use of the current two-tiered system and will ensure consistency as required by State law. Amendments to the Land Use Element and the Land Use Maps resulting from the proposed integration are intended to ensure consistent application of the proposed amended land use designations and to correct previous oversights and errors in the land use maps.

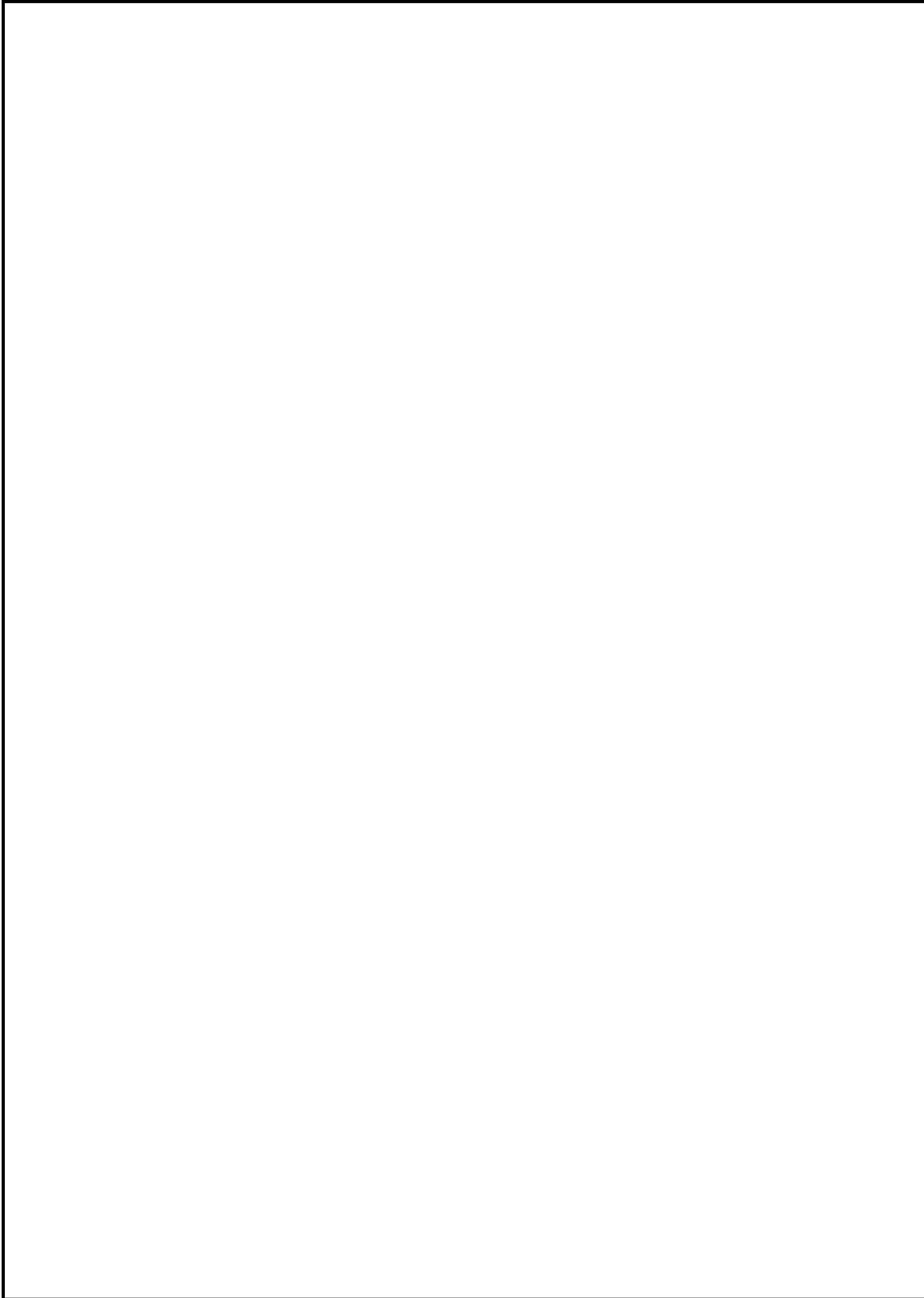


FIGURE 1

**LOCATION MAP--MONO COUNTY
MONO COUNTY GENERAL PLAN**

The 1993 Mono County General Plan includes the following elements: Land Use, Circulation, Housing, Conservation/Open Space, Safety, Noise, and Hazardous Waste Management. The General Plan provides the County with long-term land use planning guidance that balances the need to provide employment, housing, public services, economic growth and recreational opportunities with the need to protect and maintain the County's physical environment. The 1993 General Plan includes countywide land use plans and policies as well as Area Plans which provide specific land use designations and policies for individual community areas. Specific objectives in each element are supported by an array of policies or programs; each of these is in turn accompanied by specific actions or implementation measures. The general intent of the proposed policies, programs and actions is to establish a regulatory framework and direction for land use, and to "mitigate" the impact of development allowable under the General Plan. The complete text of objectives, policies and implementation actions can be found in the General Plan.

PROJECT DESCRIPTION--PROPOSED GENERAL PLAN LAND USE AMENDMENTS

The proposed General Plan Amendments include the following components:

- **Integration of the Land Use Regulations into the General Plan.**

Currently, Mono County has two documents which govern land use; the **General Plan** which provides policy direction and the **Mono County Zoning and Development Code** which provides implementing regulations for General Plan policies. The General Plan contains Land Use Designations which specify what uses may occur on each parcel. The Zoning Code contains Zoning Districts which also specify what uses may occur on each parcel. State planning law requires the specifications in the Land Use Designations and the Zoning Districts to be consistent.

The proposed integration of the Land Use Regulations (i.e. Zoning and Development Code) into the General Plan includes the development of a single set of land use designations to replace the current General Plan Land Use Designations and Zoning Districts. The purpose of this is to reduce the confusion resulting from the use of the current two-tiered system and to ensure consistency as required by State law. Table 1 shows the relationship of the existing land use designations, the existing zoning districts, and the proposed land use/zoning designations.

The proposed integration of the Land Use Regulations (i.e. Zoning and Development Code) into the General Plan also includes the incorporation of the current zoning regulations into the Land Use Element of the General Plan as a separate section titled Land Use Regulations. The new name, "Land Use Regulations", is intended to indicate the close relationship between these implementing regulations and the policies contained in the General Plan.

Changes to the Zoning Code, including the land use designations, are minimal and are intended to clarify existing language, amend existing language to ensure consistency with General Plan policies and State planning law, and to reflect minor changes recommended during community planning meetings. Four new designations have been added which currently exist as Zoning Districts but not as General Plan Land Use Designations: Rural Mobilehome (RMH), Service Commercial (CS), Resource Extraction (RE), and Natural Habitat Protection (NHP). The intent of this is to ensure consistency between existing zoned parcels and the proposed new designations.

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**TABLE 1
PROPOSED INTEGRATION OF ZONING DISTRICTS & GENERAL PLAN LAND USE
DESIGNATIONS**

Existing Zoning Districts		Existing General Plan Land Use Designations		Proposed General Plan/Zoning Designations	
RR	Rural Residential	LLR	Large Lot Residential	ER or RR (5)	Estate Residential or Rural Residential, 5 acre min.
RL	Rural Living	ER	Estate Residential	ER or RR	Estate Res. or Rural Res.
RMH	Rural Mobilehome		(None)	RMH	Rural Mobilehome
SFR	Single Family Res.	LR	Low Density Res.	SFR	Single Family Res.
R-2	Duplex Residential	MR	Moderate Density Res.	MFR-L	Multi-Family Res.-Low
R-3	Multiple Family Res.		(None)		(Eliminated)
MFR	Multiple Family Res.	HR	High Density Res.	MFR-M	Multi-Family Res.-Mod.
MFR-H	MFR-High		(None)	MFR-H	Multi-Family Res.-High
MU	Mixed Use	MU	Mixed Use	MU	Mixed Use
CL-M	Comm. Lodging-Mod.	CL-M	Comm. Lodging-Mod.	CL, M	Comm. Lodging--Moderate
CL-H	Comm. Lodging-High	CL-H	Comm. Lodging-High	CL, H	Comm. Lodging--High
CR	Concentrated Resort	RU	Rural Resort	RU	Rural Resort
C	General Commercial	C	Commercial	C	Commercial
CN	Neighborhood Comm.		(None)		(Eliminated)
CS	Service Commercial		(None)	CS	Service Commercial
IP	Industrial Park	LI	Light Industrial	IP	Industrial Park
I	Industrial	HI	Heavy Industrial	I	Industrial
RE	Resource Extraction		(None)	RE	Resource Extraction
PA	Public Agency	PF	Public Facility	PF	Public Facility
GP	General Purpose	RM	Resource Management	RM	Resource Management
OA	Open Area	OS	Open Space	OS	Open Space
NHP	Nat. Hab. Protection		(None)	NHP	Natural Habitat Protection
A	Agriculture	AG	Agriculture	AG	Agriculture
EA	Exclusive Agriculture		(None)		(Eliminated)
	(None)	AP	Area Plan	AP	Area Plan
	(None)	SP	Specific Plan	SP	Specific Plan
AH	Affordable Housing		(None)		(Eliminated)
AD	Airport Development		(None)		(Eliminated)
PUD	Planned Unit Dev.		(None)		(Eliminated)

Six existing zoning districts have been eliminated because they were not used, were redundant, and/or were not consistent with General Plan policies: Multiple Family Residential (R3--replaced by MFR-High), Neighborhood Commercial (CN), Exclusive Agriculture (EA), Affordable Housing (AH), Airport Development (AD), and Planned Unit Development (PUD).

- **Amendments to the Land Use Element of the General Plan.**

As discussed in the previous section, this includes amendments to the land use designations. The land use maps have been amended to reflect the new designations and, in some cases, new minimum lot sizes recommended during community planning meetings. Table 3 in the Land Use Element, Buildout by Planning Area and Land Use Designations, has been amended to reflect the changes shown on the land use maps. Policies for the Bodie Hills Planning Area have also been included.

- **Countywide Revision of Land Use Maps.**

Following the integration of the land use designations and the zoning districts, the land use maps which show parcel specific application of the designations have been revised. The purposes of this revision are to ensure consistency with the policies of the Mono County General Plan Update adopted in 1993 and to implement the new land use designations. This revision is essentially a refinement of existing designations and maps, reflecting corrections to parcels overlooked or incorrectly designated in the 1993 General Plan, and necessary name changes to implement the new land use designations. Substantive changes are limited to parcels where the existing designation was inconsistent with General Plan policies and to parcels for which more precise designations were recommended during community planning meetings.

Maps showing the proposed new land use designations are available with the project packet.

BUILDOUT CHANGES RESULTING FROM PROPOSED LAND USE AMENDMENTS

Buildout changes resulting from the proposed land use amendments are presented in the following tables:

- Table 2: Buildout by Land Use Designations--Countywide Totals
- Table 3: Buildout by Land Use Designations--Countywide Totals, Existing and Proposed
- Table 4: Buildout by Land Use Designations--Countywide Change and Percent Change from Adopted General Plan
- Table 5: Buildout by Planning Area--Existing and Proposed Total Buildout

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TABLE 2

BUILDOUT BY LAND USE DESIGNATIONS COUNTYWIDE TOTALS

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre	4,426	1,798
RR Rural Residential	1 du/acre	4,201	1,076
RMH Rural Mobilehome	1 du/acre	508	430
SFR Single Family Residential	5.8 du/acre	1,027	3,981
MFR-L Multiple Family Residential Low	11.6 du/acre	32	370
MFR-M Multiple Family Residential Moderate	15 du/acre	17	255
MFR-H Multiple Family Residential High	15 du/acre	9	135
MU Mixed Use	15 du/acre	380	5,700
CL, M Commercial Lodging, Moderate	15 du/acre	21	315
CL, H Commercial Lodging, High	15 du/acre	20	300
RU Rural Resort	1 du/5 acres	573	---
C Commercial	15 du/acre	173	2,595
CS Service Commercial	---	12	---
IP Industrial Park	---	41	---
I Industrial	---	94	---
RE Resource Extraction	---	556	---
PF Public/Quasi-Public Facilities	---	555	---
RM Resource Management	1 du/40 acres	29,810	745
OS Open Space	1 du/80 acres	---	---
NHP Natural Habitat Protection	1 du/5 acres	31	6
AG Agriculture	1 du/2.5 acres	79,156	7,124
SAA Scenic Area Agriculture		4	4
AP Area Plan	---	---	---
SP Specific Plan	---	1,745	2,264
Total Private Lands	---	123,391	27,099
RM Resource Management--Federal/State	---	1,791,982	---
OS Open Space--LADWP	1 du/80 acres	61,721	769
OS Open Space--WRID	1 du/80 acres	4,302	53
OS Open Space--Sierra Pacific Power	1 du/80 acres	946	11
OS Open Space--SCE	1 du/80 acres	1,336	15
Town of Mammoth Lakes Private Lands	---	(2,200)	---
PF--USFS Mono Lake Visitor Center	---	72	---
Total	---	1,985,950	27,947

TABLE 2

BUILDOUT BY LAND USE DESIGNATIONS COUNTYWIDE TOTALS

Notes:

This table is a revision of the existing Table 3 in the Land Use Element of the 1993 General Plan. There are separate sheets for each Planning Area in addition to the summary sheet shown here. The complete revision of Table 3 is included in Appendix A.

- du = dwelling unit.
- Numbers may not add up due to rounding.
- Maximum potential dwelling units may not equal total acreage multiplied by the allowable density. This is due to the designation of minimum lot sizes other than those established by the allowable density. See Table 3 in Appendix A for individual sheets for each Planning Areas which explain du calculations in each planning area.
- The acreage figure for the Town of Mammoth Lakes Private Lands is not included in the total private lands acreage since planning authority for those lands lies with the Town of Mammoth Lakes.
- The private land total has changed from the existing total in Table 3 in the Land Use Element of the 1993 General Plan due to more accurate maps, more precise calculations (including the exclusion of streets), and land exchanges and sales which have occurred between public and private ownership since 1993.
- The calculations for maximum potential dwelling units do not include the potential for secondary housing units where it is available.
- The maximum potential dwelling units have not been calculated for the Rural Resort (RU) designation. Although the designation allows one du/5 acres, it does not allow subdivisions. Other environmental constraints also limit development on that land. No development plans have been submitted for most of the property designated RU.
- Densities over 1 du/acre are dependent on the availability of community water and sewer services. As a result, the maximum allowable buildout is unlikely to occur on parcels with designations which allow multi-family residential development.
- The maximum allowable buildout is also unlikely to occur on parcels designated Open Space (OS). All the parcels designated OS are owned by utility companies (LADWP, WRID, Sierra Pacific Power, and SCE). Due to environmental constraints and the ownership, it is unlikely that these lands will develop, particularly to their maximum allowable buildout.
- The 31 acres designated Natural Habitat Protection (NHP) were overlooked in the 1993 General Plan.
- The 1,336 acres designated Open Space (OS)--SCE were overlooked in the 1993 General Plan.
- A small reduction in the total acreage designated Resource Management (RM)--Federal/State reflects land exchanges and more precise maps.

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TABLE 3

BUILDOUT BY LAND USE DESIGNATIONS COUNTYWIDE TOTALS – EXISTING & PROPOSED

Land Use Designation	Density	Acres		Maximum Potential Dwelling Units	
		Existing	Proposed	Existing	Proposed
ER Estate Residential	1 du/acre	12,267 ^a	9,135	8,772	3,304
RR Rural Residential	1 du/acre				
RMH Rural Mobilehome	1 du/acre				
SFR Single Family Residential	5.8 du/acre	1,163	1,027	6,548	3,981
MFR-L Multiple Family Residential Low	11.6 du/acre	13	32	145	370
MFR-M Multiple Family Residential Mod.	15 du/acre	32 ^b	26	475	390
MFR-H Multiple Family Residential High	15 du/acre				
MU Mixed Use	15 du/acre	250	380	3,756	5,700
CL, M Commercial Lodging, Moderate	15 du/acre	21	21	320	315 ^c
CL, H Commercial Lodging, High	15 du/acre	20	20	295	300 ^c
RU Rural Resort	1 du/5 acres	318	573	---	---
C Commercial	15 du/acre	173	173	2,595	2,595
CS Service Commercial	---	0	12	0	0
IP Industrial Park	---	84	41	---	---
I Industrial	---	18	94	---	---
RE Resource Extraction	---	0	556	---	---
PF Public/Quasi-Public Facilities	---	552	555	---	---
RM Resource Management	1 du/40 ac.	48,473	29,810	1,205	745
OS Open Space	1 du/80 ac.	0	0	0	0
NHP Natural Habitat Protection	1 du/5 acres	0	31	0	6
AG Agriculture	1 du/2.5 ac.	55,774	79,156	6,460	7,124
SAA Scenic Area Agriculture	---	0	4	0	4
AP Area Plan	---	---	---	---	---
SP Specific Plan	---	3,455	1,745	690	2,264 ^d
Total Private Lands	---	122,612 ^e	123,391	31,255	27,099
RM Resource Management--Federal/State	---	1,792,569	1,791,982	---	---
OS Open Space--LADWP	1 du/80 ac.	62,677	61,721	783	769
OS Open Space--WRID	1 du/80 ac.	4,819	4,302	61	53
OS Open Space--Sierra Pacific Power	1 du/80 ac.	1,071	946	13	11
OS Open Space--SCE	1 du/80 ac.	0	1,336	0	15
Town of Mammoth Lakes Private Lands ^f	---	(2,200)	(2,200)	0	0
PF--USFS Mono Lake Visitor Center	---	0	72	---	---
Total	---	1,985,950	1,985,950	32,113	27,947

TABLE 3

**BUILDOUT BY LAND USE DESIGNATIONS
COUNTYWIDE TOTALS – EXISTING & PROPOSED**

Notes:

- a. For comparison purposes, it was necessary to aggregate the figures for the low density housing.
 - b. For comparison purposes, it was necessary to aggregate the figures for multiple family residential, moderate and high.
 - c. The maximum potential dwelling units figures for Commercial Lodging, Moderate and High, were miscalculated in Table 3 in the 1993 General Plan Update. There has been no change in these figures.
 - d. The only buildout figure for Specific Plan (SP) which was included in Table 3 in the 1993 General Plan Update was 690 dwelling units for the Conway Ranch Specific Plan in the Mono North Planning Area. Although this figure was included in the total buildout calculation for the Mono North Planning Area it was not included in the total countywide buildout calculation. Other Specific Plans had been adopted at that time but the buildout figures for those plans were not included in the buildout calculations. As a result, there is no basis for comparison between the existing and proposed figures.
 - e. In Table 3 in the 1993 General Plan Update, the acreage and dwelling unit figures for the Open Space (OS)-WRID and Open Space (OS)-Sierra Pacific Power lands were included in the totals for private lands. Due to environmental constraints and the ownership, it is unlikely that these lands will develop, particularly to their maximum allowable buildout. It is more realistic to omit these figures from the private land totals, as the Open Space (OS)-LADWP were omitted. Omitting these figures from the 1993 General Plan totals, the existing total private land = 122,612 acres, and the existing maximum potential dwelling units on private land = 31,255 dwelling units. These revised figures were used for comparison purposes.
 - f. This acreage figure is not included in the total acreage since planning authority for those private lands lies with the Town of Mammoth Lakes.
- du = dwelling unit.
 - The private land total has changed from the existing total in Table 3 due to more accurate maps, more precise calculations (including the exclusion of streets), and land exchanges and sales which have occurred between public and private ownership since 1993.
 - In the 1993 General Plan, the total buildout calculation was miscalculated. The total buildout figure for Large Lot Residential (LLR) should have been 620. The total buildout figure for Specific Plan (SP) should have been 690; this figure was included in the total for the Mono North Planning Area but was omitted from the countywide total. The correct total buildout figure has been used in this table.
 - Resource Extraction (RE) and Natural Habitat Protection (NHP) are new designations. As a result, there is no basis for comparison between the existing and proposed figures.
 - The Open Space (OS)-SCE land was overlooked in the 1993 General Plan. As a result, there is no basis for comparison between the existing and proposed figures.
 - There is no land designated Open Space (OS) other than that owned by the utility companies or Service Commercial (CS) which is why there is no change shown for those designations.

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TABLE 4

BUILDOUT BY LAND USE DESIGNATIONS COUNTYWIDE CHANGE & PERCENT CHANGE FROM ADOPTED GENERAL PLAN

Land Use Designation	Density	Acres		Maximum Potential Dwelling Units	
ER Estate Residential	1 du/acre	-3,132 ^a	-25 %	-5,468	-62 %
RR Rural Residential	1 du/acre				
RMH Rural Mobilehome	1 du/acre				
SFR Single Family Residential	5.8 du/acre	-136	-12 %	-2,567	-39 %
MFR-L Multiple Family Residential Low	11.6 du/acre	+19	+146 %	+225	+155 %
MFR-M Multiple Family Residential Mod.	15 du/acre	-6 ^b	-19 %	-85	-18 %
MFR-H Multiple Family Residential High	15 du/acre				
MU Mixed Use	15 du/acre	+130	+52 %	+1,944	+52 %
CL, M Commercial Lodging, Moderate	15 du/acre	0	0	0	0 ^c
CL, H Commercial Lodging, High	15 du/acre	0	0	0	0 ^c
RU Rural Resort	1 du/5 acres	+255	+80 %	---	---
C Commercial	15 du/acre	0	0	0	0
CS Service Commercial	---	12	+100	---	---
IP Industrial Park	---	-43	-51 %	---	---
I Industrial	---	+76	+422 %	---	---
RE Resource Extraction	---	+556	+100 %	---	---
PF Public/Quasi-Public Facilities	---	+1	+ <1 %	---	---
RM Resource Management	1 du/40 ac.	-18,663	-39 %	-460	-38 %
OS Open Space	1 du/80 ac.	0	0	0	0
NHP Natural Habitat Protection	1 du/5 acres	+31	+100 %	+6	+100 %
AG Agriculture	1 du/2.5 ac.	+23,382	+42 %	+664	+10 %
SAA Scenic Area Agriculture		+4	+100 %	+4	+100 %
AP Area Plan	---	---	---	---	---
SP Specific Plan	---	-1,710	-49 %	+1,574	--- ^d
Total Private Lands	---	+779 ^e	+ <1 %	-4,156	-13 %
RM Resource Management--Federal/State	---	-587	- <1 %	---	---
OS Open Space--LADWP	1 du/80 ac.	-956	-2 %	-14	-2 %
OS Open Space--WRID	1 du/80 ac.	-517	-11 %	-8	-13 %
OS Open Space--Sierra Pacific Power	1 du/80 ac.	-125	-12 %	-2	-15 %
OS Open Space--SCE	1 du/80 ac.	+1,336	+100 %	+15	+100 %
Town of Mammoth Lakes Private Lands ^f	---	0	0	0	0
PF--USFS Mono Lake Visitor Center	---	+72	+100 %	---	---
Total	---	0	0	-4,166	-13 %

TABLE 4

**BUILDOUT BY LAND USE DESIGNATIONS
COUNTYWIDE CHANGE & PERCENT CHANGE FROM ADOPTED GENERAL PLAN**

Notes:

- a. For comparison purposes, it was necessary to aggregate the figures for the low density housing.
 - b. For comparison purposes, it was necessary to aggregate the figures for multiple family residential, moderate and high.
 - c. The maximum potential dwelling unit figures for Commercial Lodging, Moderate and High, were miscalculated in Table 3 in the 1993 General Plan Update. There has been no change in these figures.
 - d. The only buildout figure for Specific Plan (SP) which was included in Table 3 in the 1993 General Plan Update was 690 dwelling units for the Conway Ranch Specific Plan in the Mono North Planning Area. Although this figure was included in the total buildout calculation for the Mono North Planning Area it was not included in the total countywide buildout calculation. Other Specific Plans had been adopted at that time but the buildout figures for those plans were not included in the buildout calculations. As a result, there is no basis for comparison between the existing and proposed figures.
 - e. In Table 3 in the 1993 General Plan Update, the acreage and dwelling unit figures for the Open Space (OS)-WRID and Open Space (OS)-Sierra Pacific Power lands were included in the totals for private lands. Due to environmental constraints and the ownership, it is unlikely that these lands will develop, particularly to their maximum allowable buildout. It is more realistic to omit these figures from the private land totals, as the Open Space (OS)-LADWP were omitted. Omitting these figures from the 1993 General Plan totals, the existing total private land = 122,612 acres, and the existing maximum potential dwelling units on private land = 31,255 dwelling units. These revised figures were used for comparison purposes.
 - f. This acreage figure is not included in the total acreage since planning authority for those private lands lies with the Town of Mammoth Lakes.
- du = dwelling unit.
 - Numbers may not add up due to rounding.
 - #'s indicate the difference between the existing General Plan numbers and the proposed numbers. They do not indicate total acreage or dwelling units.
 - The private land total has changed from the existing total in Table 3 due to more accurate maps, more precise calculations (including the exclusion of streets), and land exchanges and sales which have occurred between public and private ownership since 1993.
 - In the 1993 General Plan, the total buildout calculation was miscalculated. The total buildout figure for Large Lot Residential (LLR) should have been 620. The total buildout figure for Specific Plan (SP) should have been 690; this figure was included in the total for the Mono North Planning Area but was omitted from the countywide total. The correct total buildout figure has been used in this table.
 - Resource Extraction (RE), Natural Habitat Protection (NHP), and Scenic Area Agriculture (SAA) are new designations. As a result, there is no basis for comparison between the existing and proposed figures.
 - The Open Space (OS)-SCE land was overlooked in the 1993 General Plan. As a result, there is no basis for comparison between the existing and proposed figures.
 - There is no land designated Open Space (OS) other than that owned by the utility companies or Service Commercial (CS) which is why there is no change shown for those designations.

TABLE 5

**BUILDOUT BY PLANNING AREA
EXISTING AND PROPOSED TOTALS**

Planning Area	Maximum Potential Dwelling Units		Buildout Change	
	Existing	Proposed	#	%
Antelope Valley	4,495	5,194	+699	+ 16%
Swauger Creek/Devil's Gate	9	9	0	0
Bridgeport Valley	3,108	3,531	+423	+ 14 %
Bodie Hills	0	402	+42a	+ 11.6 %
Mono Basin North	1,103	1,111	+8	+ < 1 %
Mono Basin South	676	490	-186	- 28 %
June Lake	2,514	3,970	0 ^b	0
Mammoth Vicinity	856	400	-456	- 53 %
Long Valley	5,627	2,600	-3,027	- 54 %
Wheeler Crest	694	645	-49	- 7 %
Chalfant Valley	583	661	+78	+ 13 %
Hammil Valley	304	304	0	0
Benton Valley	5,755	3,874	-1,881	- 33 %
Outside Planning Areas	6,389	4,756	-1,633	- 26 %
Countywide Total	32,113 ^c	27,947	-4,166	- 13 %

Notes:

- Numbers may not add up due to rounding.
- a. Buildout change calculated assuming acreage was previously designated Resource Management (RM) which allows a density of 1 dwelling unit/40 acres. Previous buildout would have been 360 dwelling units.
- b. In the 1993 General Plan, the buildout calculation for the June Lake Planning Area did not include the buildout figure for the Rodeo Grounds Specific Plan area. Other buildout calculations for the June Lake Planning Area were miscalculated. Correcting the previous figures results in the proposed buildout; however, there is no real change in buildout from that allowed by the existing land use designations.
- c. In the 1993 General Plan, the total buildout calculation was miscalculated. The total buildout figure for Large Lot Residential (LLR) should have been 620. The total buildout figure for Specific Plan (SP) should have been 690; this figure was included in the total for the Mono North Planning Area but was omitted from the countywide total. The correct total buildout figure has been used in this table.

SUMMARY OF CHANGES--COUNTYWIDE

The following section summarizes the data found in Tables 2-5. It addresses changes in the total amount of acreage in various designations , changes in the maximum potential dwelling units countywide, and changes in the maximum potential population countywide.

Summary of Changes in Acreage Totals

- A large decrease in the total acreage designated for low density housing (ER, RR, RMH, SFR). Much of this acreage is now designated Agriculture (AG).
- A small increase in the overall number of acres designated for multiple family housing (MFR-L, M, H). This is consistent with General Plan policies of concentrating development in communities and providing opportunities for affordable housing.
- A large increase in the total acreage designated Mixed Use (MU), which is also consistent with General Plan policies of concentrating development in communities and providing opportunities for affordable housing.
- An increase in the total acreage designated Rural Resort (RU), most of which will require a specific plan for development.
- A decrease in Industrial Park (IP) acreage, but an approximately equal increase in Industrial (I) acreage.
- 556 acres have been designated Resource Extraction (RE). This indicates existing resource extraction sites which were previously designated Resource Management (RM).
- A large decrease in the total acreage designated Resource Management (RM). Most of this acreage is now designated Agriculture (AG) or Rural Resort (RU).
- The designation of 31 acres as Natural Habitat Protection (NHP). This was overlooked in the 1993 General Plan.
- A large increase in the total acreage designated Agriculture (AG).
- Land included in the Bodie Hills Planning Area was designated Rural Resort (RU) and Agriculture (AG). This land was previously included in the Outside Planning Areas category and designated Resource Management (RM).
- Reductions in the total acreage for LADWP, WRID, and Sierra Pacific Power reflect land sales and more precise maps.
- The 1,336 acres designated Open Space (OS)--SCE were overlooked in the 1993 General Plan.
- A small reduction in the total acreage designated Resource Management (RM)--Federal/State reflects land exchanges and more precise maps.

Summary of Changes in Maximum Potential Dwelling Unit Totals

- "Buildout" = maximum potential dwelling units (total acreage multiplied by allowable density).
- The calculations for maximum potential dwelling units do not include the potential for secondary housing units where it is available.
- The private land total has changed from the existing total in Table 3 due to more accurate maps, more precise calculations (including the exclusion of streets), and land exchanges and sales which have occurred between public and private ownership since 1993.
- A large decrease has occurred in the total buildout for low density housing (ER, RR, RMH, SFR). The decrease in buildout for these designations is greater than the decrease in acreage due to the establishment of minimum lot sizes in some areas which are larger than that allowed by the density.
- An increase in the total buildout for Agriculture (AG). The total buildout is substantially lower than the total that would be allowed at a density of 1 unit/2.5 acres due to the establishment of minimum lot sizes in many areas which are larger than that allowed by the density. The use of a development credits program in Bridgeport Valley, the Bodie Hills, and

Hammil Valley also reduces the buildout. That program allows a certain number of units to be developed per parcel based on the size of the parcel and the ownership.

- The buildout figures for Commercial Lodging, Moderate and High, were miscalculated in Table 3 in the 1993 General Plan Update. There has been no change in these figures.
- The only buildout figure for Specific Plan (SP) which was included in Table 3 in the 1993 General Plan Update was 690 dwelling units for the Conway Ranch Specific Plan in the Mono North Planning Area. Although this figure was included in the total buildout calculation for the Mono North Planning Area it was not included in the total countywide buildout calculation. Other Specific Plans had been adopted at that time but the buildout figures for those plans were not included in the buildout calculations. As a result, there is no basis for comparison between the existing and proposed figures.
- In Table 3 in the 1993 General Plan Update, the acreage and dwelling unit figures for the Open Space (OS)-WRID and Open Space (OS)-Sierra Pacific Power lands were included in the totals for private lands. Due to environmental constraints and the ownership, it is unlikely that these lands will develop, particularly to their maximum allowable buildout. It is more realistic to omit these figures from the private land totals, as the Open Space (OS)-LADWP were omitted. Omitting these figures from the 1993 General Plan totals, the existing total private land = 122,612 acres, and the existing maximum potential dwelling units on private land = 30,592 dwelling units. These revised figures were used for comparison purposes.
- The 1,336 acres designated Open Space (OS)--SCE were overlooked in the 1993 General Plan. This does not represent an increase in buildout.
- The maximum potential dwelling units have not been calculated for the Rural Resort (RU) designation. Although the designation allows one du/5 acres, it does not allow subdivisions. Other environmental constraints also limit development on that land. For most of the property designated RU, no development plans have been submitted.
- Densities over 1 du/acre are dependent on the availability of community water and sewer services. As a result, the maximum allowable buildout is unlikely to occur on parcels with designations which allow multi-family residential development (MFR-M, MFR-H, MU, CL-M, CL-H, RU, C).
- The 31 acres designated Natural Habitat Protection (NHP) were overlooked in the 1993 General Plan. This does not represent an increase in buildout.

Summary of Changes in Maximum Potential Population

- Maximum potential population is calculated assuming 2.51 persons per dwelling unit (1990 Census).
- Existing maximum potential population = 80,604 persons.
Proposed maximum potential population = 70,147 persons.
Change = - 10,457 persons.
[Note: Existing maximum potential population figure shown in the General Plan EIR is incorrect. Above figure is based on the corrected total maximum potential dwelling unit figure from Table 3 (Buildout by Planning Area and Land Use Designations) in the Land Use Element of the General Plan. Corrected figure is 32,113 dwelling units.]
- Maximum potential resident population is calculated assuming that the 56 percent occupancy rate identified in the 1990 Census remains constant.
- Existing maximum potential resident population = 45,138 persons.
Proposed maximum potential resident population = 39,282 persons.
Change = -5,857 persons.
[Note: Existing maximum potential population figure shown in the General Plan EIR is incorrect. Above figure is based on the corrected total maximum potential dwelling unit

figure from Table 3 (Buildout by Planning Area and Land Use Designations) in the Land Use Element of the General Plan. Corrected figure is 32,113 dwelling units.]

SUMMARY OF PROPOSED LAND USE REVISIONS BY PLANNING AREA

The following summarizes the proposed revisions in land use designations by Planning Area. A complete set of Revised Community Land Use Maps (Figures 1-107 in the Land Use Element of the General Plan) is available with the project packet. A detailed summary of proposed land use revisions by Community Land Use Maps is available in Appendix B of this document.

Antelope Valley

- A 10-acre minimum lot size has been established for Agriculture (AG). The previous minimum lot size was 2.5 acres but buildout in the 1993 General Plan was calculated at 1 dwelling unit/40 acres. It was assumed that development at 1 unit/2.5 acres was unlikely to occur due to environmental constraints and community interest in maintaining the agricultural lands in the valley as open space.
- The acreage designated for Industrial Park (IP) has been reduced from 80 acres to 20 acres. The land eliminated from the Industrial Park (IP) designation will be designated Agriculture (AG).
- A 125-acre parcel previously owned by Sierra Pacific Power and designated Open Space (OS) is now privately owned and designated Rural Residential (RR 5), with a maximum 11 parcels allowed.
- A number of revisions were made which were essentially name changes only; they have no impact on buildout or potential uses of the land. This was done to ensure consistency with the proposed integrated land use designations.
- There has been an increase in potential maximum dwelling units of 699, primarily as a result of calculating the buildout for Agriculture (AG) at 1 unit/10 acres instead of 1 unit/40 acres and redesignating a number of parcels from Resource Management (RM) to Agriculture (AG).

Swauger Creek/Devil's Gate

- No change.

Bridgeport

- The buildout for parcels designated Agriculture (AG) has been calculated using the development credits program established in Hammil Valley. Previously, buildout for the AG parcels was calculated assuming 1 unit/40 acres.
- An area south of the County Park, currently designated Agriculture (AG), has been redesignated Specific Plan/Estate Residential as an expansion area for the community. An area west of Hwys. 395 and 182, currently designated Agriculture (AG) and Resource Management (RM), has been redesignated Specific Plan/Estate Residential as an expansion area for the community.
- In the Evans Tract, the Mixed Use (MU) designation has been extended along Hwy. 395.
- A number of revisions were made which were essentially name changes only; they have no impact on buildout or potential uses of the land. This was done to ensure consistency with the proposed integrated land use designations.
- There has been an increase in potential maximum dwelling units of 265, primarily as a result of calculating the buildout for Agriculture (AG) using the development credits program instead of 1 unit/40 acres.

Bodie Hills

- This is a new planning area. Land in this area was included in the Outside Planning Areas category in the 1993 General Plan.

- Most land was designated Resource Management (RM) in the 1993 General Plan. It is now designated Rural Resort (155 acres) and Agriculture (14,251 acres).
- Potential dwelling units for the Agriculture (AG) property were calculated using the development credits program established in Hammil Valley. That program allows a certain number of units to be developed per parcel, based on the size of the parcel and ownership
- There has been an increase in potential maximum dwelling units of approximately 42, due to designating the majority of the acreage Agriculture (AG) instead of Resource Management (RM) and the use of the development credits program to calculate the buildout for Agriculture (AG).

Mono Basin North

- There has been an increase in potential maximum dwelling units of 8, due to designating property Estate Residential (ER) and Rural Residential (RR) instead of Resource Management (RM). The ER has 10 acre and 40 acre minimum lot sizes; the RR has a 20 acre minimum lot size.

Mono Basin South

- New maps show the latest parcel configuration reflecting the sale of two parcels by LADWP. These lots were previously designated Open Space (OS) and are now designated Commercial (C).
- There has been a decrease in potential maximum dwelling units of 186, due to an overall reduction in acreage designated Commercial (C).

June Lake

- Corrections only, including the reduction of Specific Plan (SP) acreage for the Rodeo Grounds from 160 acres to 145, the inclusion of 31 acres designated Natural Habitat Protection (NHP), and the inclusion of 132 acres designated Resource Extraction (RE).
- In the 1993 General Plan, buildout calculations for the June Lake Planning Area were miscalculated. Correcting the previous figures results in the proposed buildout; however, there is no real change in buildout from that allowed by the existing land use designations. The increase in potential maximum dwelling units is due to a) the inclusion of the buildout figure for the Rodeo Grounds Specific Plan which was omitted from the 1993 General Plan; b) the inclusion of the buildout figure for the land designated Natural Habitat Protection (NHP) which was omitted from the 1993 General Plan; c) minor corrections of some of the buildout figures for other designations.

Mammoth Vicinity

- There has been a decrease in potential maximum dwelling units of 456, due to calculating the buildout for much of the Agriculture (AG) land at 1 unit/10 acres instead of 1 unit/2.5 acres.

Long Valley

- An area in Hilton Creek which was previously designated Single Family Residential (SFR) is now designated Specific Plan (SP) following the adoption of the Lakeridge Ranch Estates Specific Plan.
- A number of revisions were made which were essentially name changes only; they have no impact on buildout or potential uses of the land. This was done to ensure consistency with the proposed integrated land use designations.
- There has been a decrease in potential maximum dwelling units of 3,027, due primarily to a) a substantial reduction in acreage designated for low density residential use (Estate Residential, Rural Residential, and Single Family Residential), b) the establishment of minimum lot sizes in some areas which are larger than that allowed by the density, and c) a

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reduction in the acreage designated for multiple family residential uses (Multiple Family Residential--Low and Moderate, and Mixed Use).

Wheeler Crest

- There has been a decrease in potential maximum dwelling units of 49, due to a reduction of the total private lands, resulting from a land exchange into public ownership.

Chalfant Valley

- There has been an increase in potential maximum dwelling units of 78, due to the designation of additional acreage as Agriculture (AG), the designation of additional acreage for low density residential uses (Estate Residential and Rural Mobilehome), and the designation of a parcel as Commercial (C).

Hammil Valley

- No change.

Benton Valley

- There has been a decrease in potential maximum dwelling units of 1,881 due to the redesignation of a large amount of acreage from Rural Residential (RR) to Agriculture (AG). Large minimum lot sizes have also been established for much of the acreage remaining in the RR designation.

Outside Planning Areas

- There has been a decrease in potential maximum dwelling units of 1,633, due primarily to the use of the development credits program to calculate the buildout for some of the acreage designated Agriculture (AG) and the establishment of large minimum lot sizes for some of the Estate Residential (ER) acreage.

III. ENVIRONMENTAL ANALYSIS

PROJECT SCOPING

A Notice of Preparation was circulated in November/December, 1998. No comments were received. Appendix C contains a copy of the NOP.

ENVIRONMENTAL SETTING

The environmental setting and existing conditions of the project are described in the **Master Environmental Assessment (MEA)**, which is a separate document. The MEA has been amended where necessary to address the proposed land use changes and to reflect pertinent new environmental information. Since the adoption of the General Plan Update in 1993, a number of projects have been approved which provide site specific land use direction for various areas in Mono County. Many of these documents also contain site specific environmental studies which provide greater detail on a variety of environmental topics. Applicable documents have been incorporated by reference in the **Master Environmental Assessment** and should be referenced when reviewing the MEA.

CONSISTENCY WITH EXISTING PLANS

The proposed General Plan Land Use Amendments are consistent with all federal, state, and local plans which address land use in Mono County. One purpose of the proposed amendments is to ensure consistent application of Mono County's land use policies and regulations and to ensure that those policies and regulations are consistent with the policies and regulations in other documents governing land use and related topics in Mono County.

The proposed General Plan Land Use Amendments have been drafted to be consistent with the policies and regulations of the following documents:

- Mono County General Plan (Land Use, Circulation, Housing, Conservation/Open Space, Safety, Noise, and Hazardous Waste Management Elements).
- Mono County Regional Transportation Plan.
- Airport Land Use Plans (Mammoth Lakes Airport, Lee Vining Airport, Bridgeport Airport).
- Town of Mammoth Lakes General Plan.
- LAFCO Sphere of Influence Reports.
- National Forest Land and Resource Management Plans (Inyo Forest, Toiyabe Forest).
- Mono Basin National Forest Scenic Area Comprehensive Management Plan.
- Bureau of Land Management Resource Management Plan.
- Bodie State Historic Park Resource Management Plan and General Development Plan.

ENVIRONMENTAL ANALYSIS

Potential environmental impacts and mitigation measures resulting from the proposed General Plan Land Use Amendments remain the same as those identified in the 1993 General Plan EIR. The total potential buildout has decreased under the proposed amendments; while additional land may be subject to development impacts under the proposed amendments, the level of those impacts will be less overall than the impacts under the existing General Plan.

The analysis of potential significant environmental impacts resulting from the proposed General Plan Land Use Amendments is general, in accordance with Section 15146 of the CEQA Guidelines, which states that "the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR". The above section from the Guidelines recognizes that the level of analysis which is reasonably feasible in a General Plan EIR will, from necessity, be more general than that which is reasonably feasible in a project-specific EIR.

The proposed General Plan Land Use Amendments have been designed to avoid or minimize potential environmental impacts to a less than significant level. This analysis assumes that the potential significant impacts identified in the analysis will occur at the full buildout allowed. In determining whether the identified impact will be significant, conditions at full buildout are compared to existing conditions.

SIGNIFICANT CHANGES RESULTING FROM THE PROPOSED LAND USE AMENDMENTS

The following section identifies significant changes in land use resulting from the proposed land use amendments, discusses how those changes differ from existing conditions allowed by the General Plan, and discusses potential environmental impacts resulting from those changes. Since potential environmental impacts and mitigation measures resulting from the proposed amendments remain the same as those identified in the 1993 General Plan EIR, the discussion focuses on the extent of the proposed impacts and does not repeat the potential impacts and associated mitigation measures identified in the 1993 General Plan EIR. That document is incorporated by reference and should be referred to for a complete list of potential impacts and mitigation measures.

Significant changes in land use will not occur as a result of the Integration of the Land Use Regulations into the General Plan or from the resulting Amendments to the Land Use Element. The intent behind each of those actions is to minimize change by focusing on clarifying existing language, eliminating existing inconsistencies and correcting previous oversights and errors.

Although the proposed revisions to the Land Use Maps will result in some significant changes in land use, in many cases, the proposed revisions are a refinement of existing designations and maps, reflecting corrections to parcels overlooked or incorrectly designated in the 1993 General Plan and necessary name changes to implement the new land use designations (see Appendix B--Summary of Proposed Land Use Designation Changes by Community Land Use Maps). These corrections and name changes do not change existing or potential land uses and do not create any potential environmental impacts.

Overall buildout is lower under the proposed revisions. The proposed revisions shift the potential density of development in various planning areas and shift development among the planning areas. In many areas, however, the maximum potential buildout is unlikely to occur; environmental constraints to development on many lands (e.g. acreage designated Resource Management, Open Space, or Agriculture) will limit future development. Densities over 1 dwelling unit/acre are dependent on the availability of community water and sewer services; the maximum allowable buildout is unlikely to occur on parcels with designations which allow multi-family residential development (MFR-L, M, and H; MU; CL-M and H; and C).

The following significant changes will occur as a result of the proposed Revisions to the Land Use Maps:

1. Increase in Overall Private Land Acreage

The proposed Countywide Revision of the Land Use Maps will result in an overall increase in private land acreage (+779 acres, less than 1 percent of the total private land acreage), increasing the amount of land available for development.

Discussion

The increase in private land acreage is due to more accurate maps, more precise calculations (including the exclusion of streets), and land exchanges and sales which have occurred between public and private ownership since 1993. Some of the land exchanges/sales involved federal and state lands, some involved land owned by public utility entities. The federal and state lands were not previously included in the buildout calculations; the lands owned by public utility entities were. Much of the additional private land acreage is adjacent to existing communities or developed areas.

Potential development impacts and mitigation measures remain the same as those identified in the EIR for the 1993 General Plan Update. Although the total private land acreage has increased, the total potential buildout has decreased. While additional land may be subject to development impacts, the level of those impacts will be less than the impacts under the existing General Plan.

2. Overall Reduction in Total Potential Buildout

The proposed Countywide Revision of the Land Use Maps will result in an overall reduction of 4,166 units in the total potential buildout (13 percent of the total existing potential buildout) .

Discussion

The reduction in buildout could affect the county's ability to provide for local land use needs, i.e. affordable housing, local industrial needs, community commercial needs, etc.. The proposed revision of the Land Use Maps designates sufficient acreage to provide for approximately 22,600 additional dwelling units (27,099 maximum potential dwelling units - approximately 4,500 existing dwelling units), far more than the 528 units identified by the State Department of Housing and Community Development as Mono County's regional housing needs.

Under the proposed revision of the Land Use Maps, potential buildout increases for Multiple Family Residential-Low (MFR-L) and Mixed Use (MU), both designations which allow multiple family housing and are designed to provided opportunities for affordable housing. Buildout also increases for the Chalfant Valley Planning Area, largely due to the redesignation of a large amount of acreage as Rural Mobilehome (RMH) which also provides opportunities for affordable housing.

The proposed revisions provide for increased acreage for commercial and industrial uses. There is no change in the amount of acreage designated Commercial (C) and a small increase in the amount of acreage designated Service Commercial (CS). A large increase in the amount of acreage designated Mixed Use (MU) also provides for commercial uses. A reduction in the amount of acreage designated Industrial Park (IP) is offset by a large increase in the amount of acreage designated Industrial (I). A significant increase in the amount of acreage designated Agriculture (AG) provides for continuing agricultural uses.

While potential environmental impacts and mitigation measures resulting from the proposed amendments remain the same as those identified in the 1993 General Plan EIR, the reduction in overall buildout will reduce the overall extent of those impacts.

3. Increase in Buildout in 5 Planning Areas

The proposed Countywide Revision of the Land Use Maps will result in an increase in buildout in the following planning areas: Antelope Valley, Bridgeport Valley, Bodie Hills, Mono Basin North, and Chalfant Valley.

Discussion

The increases in the Bodie Hills, Mono Basin North, and Chalfant Valley planning areas are relatively small. The increases in Antelope Valley and Bridgeport Valley are larger and are primarily on acreage designated Agriculture (AG).

The buildout increase in Antelope Valley (+ 699 dwelling units) is due to the establishment of a ten acre minimum parcel size on agricultural lands. Buildout for those lands was calculated at 1 dwelling unit/40 acres in the 1993 General Plan, although the designation allowed 1 unit/2.5 acres. The increase in Bridgeport Valley (+423 dwelling units) is due to the use of a development credits program to calculate potential buildout on most of the agricultural lands. That program is based on a 40 acre minimum parcel size but allows a certain number of units to be developed per parcel, depending on the size of the parcel and the ownership. In Bridgeport Valley it results in 678 potential dwelling units. Buildout for those lands was also calculated at 1 dwelling unit/40 acres in the 1993 General Plan, although the designation allowed 1 unit/2.5 acres.

It is unlikely that development will occur at the full buildout potential on these agricultural lands due to environmental constraints on much of the acreage and the special status accorded agricultural lands under the CEQA and State planning law. In addition, the buildout increase on these agricultural lands is offset by the countywide increase in acreage designated Agriculture (AG). The proposed amendments include a 42 % countywide increase in acreage designated Agriculture (AG). The General Plan also contains policies which promote the preservation of agricultural lands and which encourage cluster development on agricultural lands in order to both allow for development and conserve agricultural uses.

The buildout increase in the Bodie Hills (+42 dwelling units) is due to redesignation of the acreage from Resource Management (RM) to Rural Resort (155 acres) and Agriculture (14,251 acres). Buildout for the agricultural lands was calculated using the development credits program. The overall buildout increase is relatively small. The Resource Management designation would have allowed many of the same uses (subject to approval of a Specific Plan) that the proposed designations do.

The buildout increase in Mono Basin North (+8 dwelling units) is due to designating property Estate Residential (ER) and Rural Residential (RR) instead of Resource Management (RM). The ER has 10 acre and 40 acre minimum lot sizes; the RR has a 20 acre minimum lot size. This increase is less than one percent of the total existing potential buildout.

The buildout increase in Chalfant Valley (+78 dwelling units) is due to General Plan Amendment 96-02 which redesignated acreage in Chalfant Valley from Agriculture (AG) (1 dwelling unit/2.5 acres) to Estate Residential (ER) (1 dwelling unit/acre). This acreage is now proposed for designation as Rural Mobilehome (RMH) which allows the same density as

Estate Residential (ER). This acreage is adjacent to the developed community area and is consistent with General Plan policies of concentrating development in and adjacent to developed areas. It also provides additional opportunities for affordable housing. Potential impacts of the change from AG to ER were analyzed at the time of the General Plan Amendment. The proposed redesignation as RMH is basically a name change to comply with existing conditions in the community following input from the community.

The overall effect of these increases in potential buildout will be to increase the extent of potential environmental impacts in these areas by shifting potential development from one area of the county to another.

4. Decrease in Buildout in 6 Planning Areas

The proposed Countywide Revision of the Land Use Maps will result in a decrease in buildout in the following planning areas: Mono Basin South, Mammoth Vicinity, Long Valley, Wheeler Crest, Benton Valley, Outside Planning Areas.

Discussion

The reduction in buildout could affect the county's ability to provide for local land use needs, i.e. affordable housing, local industrial needs, community commercial needs, etc.. This impact is addressed above under Land Use Change 2.

In the Mono Basin South Planning Area (-186 dwelling units), the decrease is due to a reduction in the amount of acreage designated Commercial (C) which allows multiple family residential uses.

In the Mammoth Vicinity Planning Area (-456 dwelling units), the decrease is due to more precise calculations of potential buildout on some of the agricultural lands and does not represent a true reduction in buildout.

In the Long Valley Planning Area (-3,027 dwelling units), the decrease is due to a substantial reduction in acreage designated for low density residential use (Estate Residential, Rural Residential, and Single Family Residential), the establishment of large minimum lot sizes on much of the low density residential acreage, and a reduction in the acreage designated for multiple family residential uses (Multiple Family Residential--Low and Moderate, and Mixed Use).

In the Wheeler Crest Planning Area (-49 dwelling units), the decrease is due to a land exchange and a decrease in the amount of private land in the planning area.

In Benton (-1,881 dwelling units), the decrease is due primarily to redesignation of much of the planning area from Estate Residential (ER) to Agriculture (AG).

Outside of the Planning Areas (-1,633 dwelling units), the decrease is due to reductions in the amount of acreage designated Resource Management (RM) and Agriculture (AG). The amount of acreage designated Estate Residential (ER) and Single Family Residential (SFR) has actually increased, as has the buildout for those designations.

The overall effect of these decreases in potential buildout will be to decrease the extent of potential environmental impacts in these areas by shifting potential development from one area of the county to another.

5. **Increase in Buildout in 3 Land Use Designations**

The proposed Countywide Revision of the Land Use Maps will result in an increase in buildout in the following land use designations: Multiple Family Residential-Low (MFR-L), Mixed Use (MU), Agriculture (AG).

Discussion

The increase in buildout in the Multiple Family Residential-Low (MFR-L) and Mixed Use (MU) designations is consistent with General Plan policies of concentrating development in community areas and providing opportunities for additional affordable housing. There are no potential impacts from this buildout increase.

The increase in buildout in the Agriculture (AG) designation is the result of a 10 acre minimum lot size in Antelope Valley, the redesignation of a large amount of acreage from Resource Management (RM) to Agriculture (AG), and the use of the development credits program to calculate buildout on the agricultural lands in Bridgeport Valley and Bodie Hills, as well as in Hammil Valley. It is unlikely that development will occur at the full buildout potential on these agricultural lands due to environmental constraints on much of the acreage and the special status accorded agricultural lands under the CEQA and State planning law. This impact is addressed more fully above under Land Use Change 3.

The overall effect of these increases in potential buildout will be to increase the extent of potential environmental impacts in these areas by shifting potential development from one area of the county to another.

6. **Decrease in Buildout in 10 Land Use Designations**

The proposed Countywide Revision of the Land Use Maps will result in a decrease in buildout in the following land use designations: Low density residential (ER, RR, RMH), Single Family Residential (SFR), Multiple Family Residential-Moderate and High (MFR-M and H), Resource Management(RM), Open Space (OS)--LADWP, WRID, and Sierra Pacific Power.

Discussion

As discussed above under Land Use Change 2, the reduction in buildout could affect the county's ability to provide for local land use needs, i.e. affordable housing, local industrial needs, community commercial needs, etc..

The buildout decrease in Open Space (OS) is due to the reduction of total OS acreage as a result of land sales from the utility companies (LADWP, WRID, and Sierra Pacific Power) to private owners.

The buildout decrease in Resource Management (RM) is due to the redesignation of a substantial amount of acreage from RM to Agriculture (AG).

The buildout decrease in Multiple Family Residential--Moderate and High (MFR-M and H) is due to the redesignation of that acreage as Mixed Use (MU), which allows multiple family residential uses, as well as a variety of other commercial and residential uses.

The buildout decrease in the other designations is due to a reduction of acreage in those designations and to the establishment of minimum lot sizes larger than the allowed density on much of the acreage in the low density residential designations (ER, RR, RMH, and SFR).

The overall effect of these decreases in potential buildout will be to decrease the extent of potential environmental impacts in these areas by shifting potential development from one area of the county to another.

ENVIRONMENTAL ANALYSIS--CONCLUSIONS

The potential environmental impacts and mitigation measures resulting from the proposed amendments remain the same as those identified in the 1993 General Plan EIR. The extent of the impacts would be less under the proposed amendments since the overall density under the amendments is less than that which is currently allowed by the existing General Plan. In addition, the specific nature of the amendments would tend to reduce these impacts, e.g. reductions in the amount of residential acreage and increases in the amount of agricultural acreage would reduce the extent of several of the identified effects.

The proposed amendments shift potential development from one area of the county to another and change the maximum allowable density in various areas throughout the county. The overall effect of those changes will be to change the extent of potential environmental impacts in various areas throughout the county.

FEIR BUILDOUT REVISIONS

This additional section of the Mono County General Plan Land Use Amendments FEIR has been prepared to analyze the potential environmental impacts resulting from revisions to the maximum buildout. In June, July, and August, 2000, the Board of Supervisors held public hearings on the proposed General Plan Land Use Amendments and FEIR. During those hearings, a number of applicants requested changes in land use designations. The Board approved several of those requests and referred several back to the Planning Commission. The Planning Commission has since recommended approval of additional requested changes in land use designations.

The approval of changes in land use designations resulted in revisions to the buildout figures in three Planning Areas, Bridgeport Valley, Chalfant Valley, and Benton Valley. Table A shows the proposed changes in buildout (maximum potential dwelling units) in each of the affected planning areas. Table B (which is a revision of Table 5 in the FEIR) shows the resulting changes in the total proposed buildout for each of the affected planning areas as well as the countywide totals.

BRIDGEPORT PLANNING AREA

Approved changes in land use designations in the Bridgeport Planning Area affect buildout in four areas of the developed community. In two areas (east of the baseball field and in the Evans Tract along Hwy. 395), changes to AG and RR from ER result in a decrease of 48 dwelling units. In two other areas (adjacent to the Aurora Canyon mini-storage and on approximately 9 ac. adjacent to Hwy. 395 south of town), changes to MU instead of SFR and ER result in an increase of 206 dwelling units. The overall increase in dwelling units in the Bridgeport Planning Area is 158 d.u..

The areas where increases occur in Bridgeport are within the developed portion of the community. Densities over 1 du/acre are dependent on the availability of community water and sewer services. As a result, the maximum allowable buildout is unlikely to occur on the parcels designated MU.

The FEIR analyzes an increase in buildout in the Bridgeport Planning Area. While the latest land use redesignations further increase the buildout in Bridgeport, the effect of those redesignations may be to slightly increase the extent of potential environmental impacts in Bridgeport.

CHALFANT PLANNING AREA

The buildout increase in Chalfant Valley (+25 d.u.) is the result of redesignating RMH 40 parcels to RMH 2 and RMH 5. This acreage is located approximately 1.5 miles north of the community of Chalfant, close to the developed community area. Redesignation to RMH 2 and RMH 5 is consistent with General Plan policies of concentrating development in and adjacent to developed areas. It also provides additional opportunities for affordable housing.

The FEIR analyzes an increase in buildout in the Chalfant Planning Area. While the latest land use redesignations further increase the buildout in Chalfant, the effect of those redesignations may be to slightly increase the extent of potential environmental impacts in Chalfant.

BENTON PLANNING AREA

The redesignation of one parcel from RR to AG decreased buildout on that parcel by 78 d.u. while the redesignation of several other parcels from AG to C or MU increased buildout on those parcels by 133 d.u., resulting in a total increase of 55 d.u. in the Benton Planning Area. The parcels proposed for redesignation from AG to C or MU total approximately 9 acres within the developed area of Benton. As noted previously, densities over 1 du/acre are dependent on the availability of community water and sewer services. As a result, the maximum allowable buildout is unlikely to occur on the parcels designated C or MU.

As Table B shows, the proposed buildout for the Benton Planning Area is still substantially lower (33 %) than that allowed by the 1993 General Plan.

COUNTYWIDE

The overall effect of the latest redesignations will not affect the conclusions reached in the FEIR. The potential environmental impacts and mitigation measures resulting from the proposed amendments will remain the same as those identified in the 1993 General Plan EIR. The extent of the impacts would still be less under the proposed amendments since the overall density under the amendments is still less than that which is currently allowed by the existing General Plan.

The redesignations increase buildout within and adjacent to community areas. The increases result primarily from redesignation of parcels to MU or C. It is unlikely that the maximum allowable buildout calculated for those parcels will occur since densities over 1 du/acre are dependent on the availability of community water and sewer services.

The overall effect of the latest redesignations will be to slightly change the extent of potential environmental impacts in various areas throughout the county.

Unavoidable Impacts, Irreversible Impacts, Growth Inducing Impacts, and Cumulative Impacts will still be the same as those identified in the 1993 General Plan EIR and the extent of those impacts would still be less under the proposed amendments since the overall density under the amendments is still less than that which is currently allowed by the existing General Plan.

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TABLE A
REVISED BUILDOUT BY PLANNING AREA

	FEIR Total Proposed Dwelling Units	Additional Proposed Dwelling Units	Revised Total Proposed Dwelling Units
Bridgeport Valley	3,373	+ 158	3,531
Chalfant Valley	636	+ 25	661
Benton Valley	3,819	+55	3,874

TABLE B (Revisions shown in bold and italic type)
REVISED BUILDOUT BY PLANNING AREA
EXISTING AND PROPOSED TOTALS

Planning Area	Maximum Potential Dwelling Units		Buildout Change	
	Existing	Proposed	#	%
Antelope Valley	4,495	5,194	+699	+ 16 %
Swauger Creek/Devil's Gate	9	9	0	0
Bridgeport Valley	3,108	3,531	+423	+ 14 %
Bodie Hills	0	400	+40 ^a	+ 11.1 %
Mono Basin North	1,103	1,111	+8	+ < 1 %
Mono Basin South	676	490	-186	- 28 %
June Lake	2,514	3,970	0 ^b	0
Mammoth Vicinity	856	400	-456	- 53 %
Long Valley	5,627	2,600	-3,027	- 54 %
Wheeler Crest	694	645	-49	- 7 %
Chalfant Valley	583	661	+78	+ 13 %
Hammil Valley	304	304	0	0
Benton Valley	5,755	3,874	-1,881	- 33 %
Outside Planning Areas	6,389	4,756	-1,633	- 26 %
Countywide Total	32,113 ^c	27,947	-4,166	- 13 %

IV. IMPACT SUMMARY

EFFECTS NOT FOUND TO BE SIGNIFICANT

All environmental effects associated with implementation of the proposed land use amendments are identified as potentially significant prior to mitigation and subject to further environmental analysis at the time of project approval. Depending on the scope of the project, the size of subsequent proposed actions, and the effectiveness of mitigation measures, the effects could range from less than significant to significant.

UNAVOIDABLE SIGNIFICANT ENVIRONMENTAL EFFECTS

CEQA requires that an EIR describe any unavoidable significant impacts, "... including those which can be mitigated but not reduced to a level of insignificance" (CEQA Guidelines Section 15126.2 b). The EIR for the 1993 General Plan Update identified the following unavoidable significant environmental effects which would occur as a result of implementing the policies and actions in the General Plan.

1. Conversion of vegetation to impermeable surfaces and related secondary water quality impacts.
2. Visual impacts.
3. Increase in traffic and related air and noise quality impacts.
4. Increase in number of people exposed to natural hazards such as avalanches, volcanic episodes, earthquakes, floods and fire.
5. Reduction in wildlife habitat and increased disturbance to wildlife (e.g. increased lighting, noise, and human activities above existing levels).
6. Construction impacts (e.g. noise, vibration, dust).

These unavoidable significant environmental effects would occur under the existing General Plan or under the proposed Land Use Amendments. The extent of the impacts would be less under the proposed amendments since the overall density under the amendments is less than that which is currently allowed by the existing General Plan. In addition, the specific nature of the amendments would tend to reduce these impacts, e.g. reductions in the amount of residential acreage and increases in the amount of agricultural acreage would reduce the extent of several of the identified effects.

SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The EIR must evaluate the extent to which the proposed project's primary and secondary effects would commit nonrenewable resources to uses which would make "... removal or nonuse thereafter unlikely" (CEQA Guidelines Section 15126.2 c).

The EIR for the 1993 General Plan Update identified significant irreversible environmental changes which would occur as a result of implementing the policies and actions in the General Plan.

1. Permanent loss of open space (locally significant).

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2. Increased ozone, carbon monoxide, hydrogen sulfide, reactive organic compounds and other particulate emissions associated with increased automobile trips and industrial, recreational, and mineral resource development (particulates--significant).
3. Loss of some individuals from animal and plant populations and loss of habitat (locally significant).
4. Reduction of natural energy resources (locally significant).
5. Reduction of mineral resources (locally significant).
6. Localized degradation and loss of visual resources (locally significant).
7. Localized degradation and loss of cultural resources (significant).

These irreversible changes would still occur but the proposed amendments to the Land Use Element would not increase the extent of these changes. In some cases, the proposed amendments could reduce the extent of these changes, e.g. reductions in the amount of residential acreage and increases in the amount of agricultural acreage would reduce the extent of several of the identified changes.

GROWTH INDUCING IMPACTS

An EIR must "discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment" (CEQA Guidelines Section 151126.2 d).

Implementation of the proposed General Plan Land Use Amendments could create the following growth inducing impacts:

1. Proposed revisions to the land use maps designate more acreage for commercial, industrial and agricultural uses than is now designated for those uses. This could create additional employment opportunities which could result in the migration of new workers to the county.
2. An influx of new workers to the county could require the creation and/or extension of public services and utilities, including roadways, which in turn could induce further growth.
3. Proposed revisions to the land use maps designate less land for recreational uses. This would have no growth inducing impact and might actually reduce the number of recreational visitors to the County.
4. The proposed land use maps designate significantly less acreage for low density housing [Estate Residential (ER), Rural Residential (RR), Rural Mobilehome (RMH), and Single Family Residential (SFR)]. The maximum potential buildout in these designations has also decreased significantly due to the reduction in acreage in the designations and to the establishment of minimum lot sizes larger than the allowed density on much of the acreage.

Acreage in multiple family residential designations has increased overall [Multiple Family Residential Low (MFR-L), Mixed Use (MU), and Service Commercial (CS) have increased; Multiple Family Residential Moderate and High (MFR-M and H) have decreased; Commercial Lodging, Moderate and High (CL-M and H) and Commercial (C) have remained the same]. The maximum potential buildout in these designations has

increased due to the increase in acreage in the designations. These designations are applied only in community areas; the increase in potential buildout may have growth inducing impacts in communities. Several of the designations that allow multiple family residential development are primarily intended for commercial uses (MU, CS, CL-M and H, and C); it is unlikely that they will develop to their full residential buildout potential. In addition, development to the full allowed density assumes the development of a water and sewer system in those areas.

5. The proposed Land Use Amendments have a lower total potential buildout (27,947 dwelling units) than the existing General Plan (32,113 dwelling units) and an associated reduction in potential growth inducing impacts. In addition, the proposed amendments focus on consistently applying the policies and regulations in the General Plan and the Land Use Regulations. Consistent application of those policies will concentrate development in community areas and conserve natural resources, minimizing potential secondary impacts to the surrounding environment.

CUMULATIVE IMPACTS

"Cumulative impacts refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."
(CEQA Guidelines Section 15355)

The proposed land use amendments would not in themselves contribute to cumulative impacts. The proposed amendments reduce the overall buildout and the level of impacts associated with that buildout. Although the cumulative impacts of projects allowed under the proposed amendments would be significant, they would be less than the cumulative impacts resulting from projects allowed by the existing General Plan Land Use Element.

In order to minimize potential cumulative impacts and to ensure a consistent approach to land use planning, the General Plan was developed in cooperation with other local, state and federal land management agencies. The Plan contains policies which require the County to coordinate future planning efforts with applicable land management agencies and to coordinate implementation of those plans. These policies serve as mitigation measures to address potential cumulative impacts.

PROJECT ALTERNATIVES

"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."
(CEQA Guidelines Section 15126.6)

CEQA requires the analysis of a No Project alternative as well as other reasonable alternatives. The alternatives developed for the proposed General Plan Land Use Amendments were evaluated based on their potential to fulfill the proposed project objective to:

"... provide one integrated document which governs land use in Mono County, and b) ensure consistent application of the policies and regulations contained in that document."

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Integration of the existing **Zoning and Development Code** with the **General Plan Land Use Element** will have no significant environmental impacts since the regulations contained in those documents are being revised only minimally to ensure consistency, clarify existing language, and correct previous errors and oversights. As a result, the Alternatives Analysis focuses on alternative densities which could be allowed by the land use maps. The Alternatives Analysis discusses only three alternatives, the required No Project and Proposed Project alternatives and a lower density development alternative. Other alternatives, such as a higher density alternative or a no growth alternative, were considered but were considered unfeasible since they would not meet the project goal and/or would not avoid or substantially lessen any of the significant effects of the project.

No Project Alternative

The No Project Alternative would leave the Zoning and Development Code as a separate document from the General Plan. The General Plan Land Use Designations and Zoning Districts would not be integrated; the land use maps would not be revised. This alternative would not meet the project goal of providing one integrated document which governs land use in Mono County and of consistently applying the policies and designations contained in that document. This alternative also would not avoid or lessen any significant effects of the project. The environmental impacts of the proposed project are the same as those identified in the General Plan; implementing the proposed land use amendments would lessen those impacts since the overall potential buildout allowed under the proposed amendments is lower than the potential buildout under the existing General Plan.

Proposed Project Alternative

The project would be implemented as described elsewhere in this document. The General Plan Land Use Designations and Zoning Districts would be integrated; the land use maps would be revised as described elsewhere. This alternative would meet the project goal of providing one integrated document which governs land use in Mono County and of consistently applying the policies and designations contained in that document. The environmental impacts of the proposed project are the same as those identified in the General Plan; implementing the proposed land use amendments would lessen those impacts since the overall potential buildout allowed under the proposed amendments is lower than the potential buildout under the existing General Plan.

Lower Density Development Alternative

Under a lower density development alternative, the General Plan Land Use Designations and the Zoning Districts would be integrated; the land use maps would be revised to provide a lower buildout than is provided by the proposed amendments to the land use maps. This alternative would meet the project goal of providing one integrated document which governs land use in Mono County and of consistently applying the policies and designations contained in that document. It would also avoid or lessen any significant impacts of the proposed project by reducing the potential maximum buildout.

While this alternative would have fewer environmental impacts, it would not necessarily be consistent with the overall General Plan land use goal of "maintaining and enhancing the environmental and economic integrity of Mono County while providing for the land use needs of residents and visitors".

PREFERRED ALTERNATIVE

The Proposed Project Alternative is the preferred alternative because it best achieves the project objective while reducing the potential maximum buildout in the General Plan and reducing significant environmental effects resulting from that potential buildout.

V. MITIGATION MONITORING PROGRAM

The CEQA (Public Resources Code Section 21081.6) and the Mono County Environmental Handbook require the County to adopt, or make a condition of approval, a reporting and monitoring program to ensure compliance with project mitigation measures or conditions.

Mono County General Plan goals, objectives, policies and implementation measures serve as the mitigation measures for potential significant environmental impacts identified in this EIR. Those measures are monitored in accordance with the following:

- California Government Code Section 65400 (b) requires annual review of General Plan Elements.
- Mono County General Plan policies (Land Use Element, Objective I, Policy 1 and associated actions) require the Planning Department to review the General Plan and the Master Environmental Assessment (MEA) annually and to present a status report to the Planning Commission and the Board of Supervisors. One component of this report is compliance with General Plan policies.
- General Plan policies also require the Planning Department to initiate revisions and amendments to the General Plan and MEA as necessary to ensure that implementation of the General Plan is based on the latest available environmental information.
- The Planning Department will review future development projects (including building permits) for compliance with the General Plan, applicable Area Plans, and Specific Plans. When necessary, the Department will coordinate its activities with other County departments as well as local, state, and federal agencies, to ensure effective implementation of General Plan policies and mitigation measures.
- The Planning Commission and Board of Supervisors are responsible for certifying future environmental documents and granting discretionary project approvals in a manner that is consistent with General Plan policies and mitigation measures.
- The County's regional and community planning advisory committees, which were active in the 1993 Update of the General Plan and in the recent revisions to the land use maps, will continue to assist in implementation of the General Plan. The committees will assist the Planning Department in reviewing and, when necessary, revising Area Plan policies, and in developing ordinances, regulations and procedures to implement General Plan policies.
- The timeframes for monitoring are ongoing for the twenty year life of the plan.

VI. EIR COMMENTS & RESPONSES

This chapter contains comments on the 1999 Mono County Land Use Element Amendments and responses to those comments.

PUBLIC REVIEW PROCESS

The 1999 Mono County Land Use Element Amendments were circulated for both agency and public review from September 2 -- October 31, 1999. The original closing date was October 15, 1999; a 15-day extension was granted in response to a request from the public. Notices announcing the availability of the documents were placed in the local newspapers (Mammoth Times and Review Herald) and posted at various locations throughout the county. Local and Federal agencies and organizations were provided documents, as were individuals or organizations requesting copies; the State Clearinghouse distributed copies to State agencies. Copies were available for review or purchase (at the cost of reproduction) at the Planning Department offices in Bridgeport and Mammoth Lakes. Copies were also available for review at all branches of the county library system.

LIST OF COMMENTING AGENCIES, ORGANIZATIONS, & INDIVIDUALS

Twelve comments were received. Three comments were from State agencies; one was from an organization; 8 were from individuals.

Comments were received from the following entities:

State Agencies

California Department of Fish and Game (DFG): Alan Pickard, Supervisor, Habitat Conservation Program, Bishop, California.

California Department of Transportation (Caltrans): Tom Meyers, Associate Transportation Planner, Bishop, California.

Cal/EPA, Lahontan Regional Water Quality Control Board (Lahontan): Cindy Wise, Environmental Specialist IV, Acting Lead, Southern Watersheds Unit, Lake Tahoe, California.

Organizations

Desert Survivors: Emily Strauss, Bodie Task Force Chairperson, Berkeley, California.

Individuals

MYERS, Phil and Mary: Bridgeport, California.

LANGNER, Mark: Bridgeport, California.

POULSEN, Glen: Olympic Valley, California.

SCHMID-MAYBACH, Ulrich: San Francisco, California.

STRAUSS, George: Berkeley, California.

TOLDI, Francis: Burlingame, California.

TOOMEY, Steve: Hammil Valley, California.

WOFFORD, Donald E.: Bishop, California.

RESPONSE FORMAT

"The written response shall describe the disposition of significant environmental issues raised (e.g. revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice."

[CEQA Guidelines Section 15088 (b)]

The responses explain how the Environmental Impact Report (EIR) currently addresses specific concerns raised in the comment letters, note where the EIR has been amended to address concerns raised in the comment letters, and explain why certain comments and/or suggestions were not incorporated into the Final Environmental Impact Report (FEIR).

"... CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR." [CEQA Guidelines Section 15204 (a)]

The FEIR for the 1999 Mono County General Plan Land Use Amendments responds to significant environmental issues as well as other comments and concerns raised by reviewers. Changes were made to the Draft EIR and the Draft Land Use Element Amendments in response to comments received. Those changes are indicated by *bold and italicized print* in appropriate sections of the Land Use Element Amendments and EIR and are summarized in the following section.

SUMMARY OF CHANGES TO LAND USE AMENDMENTS & EIR IN RESPONSE TO COMMENTS

1. Land Use Element, Objective A, Policy 2, Action 2.1, which requires necessary services and facilities to be available or to be provided as a condition of approval for proposed projects, has been amended to specifically include transportation infrastructure.
This was a suggestion from Caltrans.
2. The DEIR contains an error concerning proposed designations for the Bodie Hills. The second bulleted item under Bodie Hills on p. 22 of the DEIR should read as follows:
 - Most land was designated Resource Management (RM) in the 1993 General Plan. It is now designated Rural Resort (155 acres) and Agriculture (14,251 acres).

Table 3--Bodie Hills, on p. 43 of the DEIR, has also been corrected to show that the only designations for the Bodie Hills are RU and AG.

Other figures throughout the DEIR have been changed as a result of correcting the above error.

3. Land Use Maps 41-44, which cover the Bodie Hills Planning Area, show how many Development Credits will be allowed for each parcel designated AG. The legend for these maps will be amended to indicate that the numbers shown in the AG designated parcels (i.e. 5 dc, etc.) indicate the number of Development Credits allowed for each parcel. This was done to correct an oversight.
4. The total countywide decrease in buildout was erroneously noted as 4,044 in several places in the text of the DEIR. This has been corrected to indicate the proper figure of 4,406.

COMMENTS AND RESPONSES

The comment letters are reproduced in their entirety in the following section. Responses to comments are in *bold and italicized print*.

DEPARTMENT OF FISH AND GAME

Eastern Sierra and Inland Deserts Region
Bishop Field Office
407 W. Line Street
Bishop CA 93514
(760) 872-1171

October 29, 1999

Mr. Keith Hartstrom
Mono County Planning Department
P.O. Box 8
Bridgeport, CA 93517

Dear Mr. Hartstrom:

**MONO COUNTY LAND USE AMENDMENT
MONO COUNTY, CALIFORNIA
SCH# 98122016**

The Department of Fish and Game (Department) has reviewed the Draft Environmental Impact Report (DEIR) for Mono County General Plan Land Use Amendments, SCH # 98122016. The project as proposed would integrate the land use regulations (zoning) into the General Plan, amend the Land Use Element of the General Plan, and revise the Land Use Maps.

The Department is providing comments on this DEIR as the state agency which has the statutory and common law responsibilities with regard to fish and wildlife resources and habitats. California's fish and wildlife resources, including their habitats, are held in trust for the people of the State by the Department (Fish & Game Code section 711.7). The Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitats necessary for biologically sustainable populations of those species (Fish & Game Code section 1802). The Department's fish and wildlife management functions are implemented through its administration and enforcement of the Fish and Game Code (Fish & Game Code Section 702). The Department is a trustee agency for fish and wildlife under the California Environmental Quality Act (see CEQA Guidelines, 14 Cal. Code Regs. Sec. 15386(a)). The Department is providing these comments in furtherance of these statutory responsibilities, as well as its common law role as trustee for the public's fish and wildlife.

The Department has concerns with the rezoning of the Murphy Spring area from Resource Management to Agriculture, due to the potential impacts from possible future development on sage grouse habitat. We therefore request that the Murphy Spring area be retained as Resource Management.

The Murphy Spring area is located along the Bodie Road, a few miles west of Bodie and the Bodie Bowl (see Figure 42 in the Land Use Maps). Private land in that area includes four adjacent parcels which total 235 acres. The parcels are currently designated Resource Management (RM). In the Bodie Bowl Area of Critical Environmental Concern and Bodie Hills

Planning Area: A Recommended Cooperative Management Plan (Draft, 1994), prepared by the Bodie Area Planning Advisory Committee (BAPAC), those parcels were proposed for designation as Rural Resort (RU); the proposed designation was changed to Agriculture (AG) in the 1999 LU Element at the request of the landowner.

The intent of the RM designation is to recognize and maintain a wide variety of values in the lands outside existing communities. The "RM" designation indicates that the land may be valuable for uses including but not limited to recreation, surface water conservation, groundwater conservation and recharge, wetlands conservation, habitat protection for special status species (both plants and animals), wildlife habitat, visual resources, cultural resources, geothermal resources, or mineral resources. In other cases, the land may need special management consideration because of the presence of natural hazards in the area, such as avalanche prone areas, earthquake faults, flood hazards, or landslide or rockfall hazards. The RM designation allows 1 dwelling unit per 40 acres along with a secondary unit. The RM designation would allow 6 dwelling units on the subject parcels, plus 6 secondary units, for a total of 12 dwelling units. Higher intensity uses may be permitted subject to the approval of a Specific Plan.

The AG designation and the Transfer of Development Credits Program proposed in the 1999 Amendments to the Land Use Element were developed by the Bodie Area Planning Advisory Committee. The intent of the AG designation is to preserve and encourage agricultural uses, to protect those uses from becoming subject to urban development, and to provide for the orderly growth of activities related to agriculture. The Transfer of Development Credits Program assigns a certain number of development credits to each parcel based on an established formula; this supercedes the density of 1 dwelling unit per 2.5 acres and a secondary unit allowed by the General Plan on AG parcels. The formula for assigning Development Credits is included in the Bodie Hills land use policies under Objective I (see Draft Revised Land Use Element, p. 60). It would allow 18 dwelling units on the 235 acres located in the vicinity of Murphy Spring (see Figure 42, Land Use Maps).

Each development credit (DC) permits the construction of one single family residence. Development credits may be transferred to parcels as small as one acre in size. Development credit parcels should be clustered as follows:

- adjacent to existing residential development if feasible.*
- with a buffer established in consultation with adjacent agricultural landowners.*
- to avoid steep slopes and fault hazard areas.*
- to avoid wetlands and areas subject to flooding.*
- away from visually sensitive areas, such as ridgelines or along scenic highways.*
- to minimize impacts to wildlife, including migrating deer.*
- to minimize impacts to cultural resource sites.*
- proximate to existing access and utilities if feasible.*
- on soils of sufficient structural and sanitary waste disposal capabilities.*

We are also concerned with the Rural Resort designation for the parcel along Clearwater Creek currently being considered for development as an RV park. That parcel is important to migratory deer in the area and the riparian habitat along Clearwater Creek should also be protected for its watershed values. Our concerns regarding the development of this parcel are contained in our correspondence to the County on September 25, 1999.

The Rural Resort designation for the parcel along Clearwater Creek was proposed by the Bodie Area Planning Advisory Committee (BAPAC), an appointed public advisory committee. The

LU Amendment EIR

BAPAC was commissioned by the Mono County Board of Supervisors, in consultation with the BLM, to develop land use policy recommendations for the Bodie Hills Planning Area. The BAPAC was composed of individuals representing a wide variety of interests, including local landowners, mining interests, environmentalists, historic preservationists, tourism, etc.. The Committee, through numerous public meetings, developed draft policies and land use designations for the Bodie Hills Planning Area which have since been incorporated into the 1999 Draft Mono County General Plan Land Use Element Amendments.

Concerns regarding development of the proposed Bodie Hills RV Park on the parcel, including the issues of migratory mule deer and protection of the riparian habitat, are addressed in the FEIR for the Bodie Hills RV Park Specific Plan. In brief, the project provides a wildlife movement corridor to reduce impacts to migratory deer to a less than significant level and establishes an Open Space Corridor along Clearwater Creek which extends 30 feet north of the top of the north bank to 30 feet south of the top of the south bank. No development will be allowed in that corridor except 3 bridges across the creek. The Bodie Hills RV Park Specific Plan also contains streambank restoration and enhancement measures to stabilize the streambanks and to enhance the riparian vegetation and habitat value in the corridor.

The Department believes that the Lower Density Development Alternative is the environmentally superior alternative as it is recognized as having fewer environmental impacts. The Department also believes that this alternative meets the General Plan land use goal of "maintaining and enhancing the environmental...integrity of Mono County...". We therefore request that the Lower Density Development Alternative be selected as the Preferred Alternative.

This comment will be considered during the decisionmaking process on the rezoning.

On the whole the Land Use Plan update provides clear and well organized information. However, resource agencies generally do not use plat maps to track location information for issues of concern. Transfer of information from our files and databases is laborious, uncertain, and probably incomplete, especially for rural and remote areas. This makes it difficult to accurately evaluate our concerns over potential impacts to fish and wildlife resources and habitats. As soon as feasible in the future we recommend changing to a web-based Geographic Information System (digital) approach coordinated with trustee resource and land management agencies. We realize implementation of this concept will be involved and difficult, however, Mono County's exceptional natural capital warrants this bold step.

The County is in the process of developing a GIS system which will, out of necessity, be parcel based. The County must be able to track individual parcels for planning purposes. However, the GIS system will also import resource data from resource agencies, such as the BLM and the Forest Service, wherever possible, particularly in the undeveloped portions of the County, outside of community areas.

Thank you for the opportunity to comment on the DEIR for the Mono County General Plan Land Use Amendments. If you have any questions, please call Ms. Denyse Racine, Environmental Specialist, at (760) 872-1158.

Sincerely,

Alan Pickard, Supervisor
Habitat Conservation Program

cc: Mr. C. Taucher
Ms. D. Racine
Mr. R. Thomas
Mr. D. Wong
Mr. S. Parmenter
State Clearinghouse

STATE OF CALIFORNIA - BUSINESS, TRANSPORTATION, AND HOUSING AGENCY GRAY DAVIS, *Governor*

DEPARTMENT OF TRANSPORTATION

DISTRICT 9

500 S. Main Street

BISHOP, CA 93514

Phone (760) 872-0659

Fax (760) 872-0678

Keith Hartstrom
Mono County Planning Department
P.O. Box 8
Bridgeport, Ca. 93517

FILE: MONO-395
General Plan

Dear Mr. Hartstrom:

Thank you for the opportunity to review Mono County Revised Land Use Element of the General Plan and Associated Draft Environmental Impact Report. We have the following comments:

- There is substantial concern in the northern half of Mono County over the potential future need to relocate or expand US 395 because of future traffic congestion. We would suggest a policy be added to the General Plan that specifically addresses this concern from the standpoint of implementing traffic management and access management policies which will insure the better utilization of the current system and reduce the need for such future improvements.

Suggested approach:

Goal: Place under current goal -- "Maintain and enhance the environmental and economic integrity of Mono County while providing for the land use needs of residents and visitors."

Objective X: (added) Maintain the current alignment and design of US 395 by reducing the need to expand or relocate the highway while accommodating growth and development of our communities.

Policy: Manage the highway in such a way as to maximize its current traffic carrying capabilities.

Action: Minimize existing traffic impacts to US 395 by access locations (driveways and road connections), by relocating and combining driveways and other access to US 395 whenever possible in accordance with generally accepted methods of access management.

Action: Prevent or minimize future impacts to the highway operations by requiring new subdivision lots access the State highway through a system of internal roads and not allow multiple access points directly to the state highway (with exceptions on a case by case basis).

Action: New commercial driveways and all changed land uses that require a discretionary permit should be reviewed for adequate driveway placement including such things as distance from intersections and sight distance.

LU Amendment EIR

The policies suggested above are more appropriate for inclusion in the Circulation Element of the Mono County General Plan and in the Mono County Regional Transportation Plan (RTP). The RTP is being updated in 2000; the above suggestions will be included in that update.

- Objective A, Policy 2, Action 2.1, Page II-27. We suggest that transportation infrastructure be explicitly included in this section.

The action item noted above applies countywide. It has been amended as suggested.

- We encourage Mono County to adopt a Traffic Impact Fee (TIF) Program. This TIF program should identify future transportation system improvements needed to accommodate the build-out of the General Plan and include a fair share fee program to insure that this needed infrastructure can be paid for when needed.

A TIF program will be considered in the 2000 Update of the Mono County RTP.

If you have any questions on comments, please contact Tom Meyers at (760) 872-0658.

Sincerely,
TOM MEYERS
Associate Transportation Planner

**California Regional Water Quality Control Board
Lahontan Region**

Internet Address: <http://www.mscomm.com/rwqcb6>
2501 Lake Tahoe Boulevard, South Lake Tahoe, California 96150
Phone (530) 542-5400 FAX (530) 544-2271

October 12, 1999

Mono County Planning Department
Attn: Keith Hartstrom
P.O. Box 8
Bridgeport, CA 93517

Dear Mr. Hartstrom:

**COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT FOR MONO COUNTY
GENERAL PLAN LAND USE AMENDMENTS, SCH # 98122016**

Staff of the California Regional Water Quality Control Board, Lahontan Region (RWQCB), have reviewed the above-referenced draft environmental impact report (DEIR). The proposed amendments to Mono County's General Plan include the incorporation of Land Use (zoning) Regulations into the General Plan, amendments to the Land Use Element, and extensive revisions to the Land Use Maps. The proposed amendments would shift potential development from certain areas of the county to other areas and change the maximum allowable density in various areas throughout the county. The overall effect of the proposed changes would be to change the extent of potential environmental impacts to various areas throughout the county. Our comments are limited to the potential impacts to water quality and beneficial uses of water.

General comments

The DEIR concludes that environmental impacts would be lessened under the proposed amendments because overall (i.e., county-wide) buildout estimates are reduced by approximately 4,000 units. However, the proposed amendments also would result in an increase in buildout in five planning areas (Antelope Valley, Bridgeport Valley, Bodie Hills, Mono Basin North, and Chalfant Valley). Regarding these areas, the DEIR (p. 29) states that: "*The overall effect of these increases in potential buildout will be to increase the extent of potential environmental impacts in these areas by shifting potential development from one area of the county to another.*" The DEIR is deficient because it does not evaluate or disclose the types or levels of potential impacts to water quality that may result from increased development in these five areas. As discussed below, increased development in these areas poses potentially significant impacts to water quality and beneficial uses of water. We believe that the DEIR should be supplemented to carefully analyze, disclose, and mitigate the potential adverse effects to water quality from increased development in these areas.

Countywide buildout would be decreased by 4,406 dwelling units under the proposed land use amendments (this number was erroneously noted as 4,044 in several places in the text of the DEIR). The proposed amendments would result in relatively small buildout increases in the Bodie Hills (+40 dwelling units), Mono Basin North (+8 dwelling units), and Chalfant Valley (+53 dwelling units). Increases in the Antelope Valley (+699) and the Bridgeport Valley (+265)

would be larger. The buildout increase in Antelope Valley is due to the establishment of a 10-acre minimum parcel size on agricultural lands. The buildout increase in Bridgeport Valley is due to the use of a development credits program to calculate potential buildout on most of the agricultural lands in Bridgeport Valley. The development credits program assigns a certain number of development credits to each parcel based on an established formula and encourages the development to be clustered to reduce environmental impacts. The development credits program in the Bridgeport Valley is intended to cluster development away from irrigated lands, by encouraging development to be sited in compliance with the following standards:

- adjacent to existing residential development if feasible.
- with a buffer established in consultation with adjacent agricultural landowners.
- to avoid steep slopes and fault hazard areas.
- to avoid wetlands and areas subject to flooding.
- away from visually sensitive areas, such as ridgelines or along scenic highways.
- to minimize impacts to wildlife, including migrating deer.
- to minimize impacts to cultural resource sites.
- proximate to existing access and utilities if feasible.
- on soils of sufficient structural and sanitary waste disposal capabilities.

The buildout increase in the Bodie Hills is due to redesignation of the acreage from Resource Management to Agriculture and the use of the development credits program (see the above discussion concerning Bridgeport Valley). The buildout increase in Chalfant Valley is due to General Plan Amendment 96-02 which redesignated acreage from Agriculture to Estate Residential; potential impacts of the redesignation from AG to ER were analyzed at the time of the General Plan Amendment.

CEQA recognizes that the level of analysis which is reasonably feasible in a General Plan EIR will be more general than that which is reasonably feasible in a project-specific EIR; "the degree of specificity in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR" (CEQA Guidelines Section 15146). The proposed General Plan Land Use amendments assign land use designations to private lands in the County; they do not specify how or where development may occur on those lands. It would be speculative to include more detailed analysis in the DEIR; an EIR is not required to be speculative in its analysis [CEQA Guidelines Section 15126.6 (c)].

In addition, the Mitigation Monitoring Program in the DEIR notes that "Mono County General Plan goals, objectives, policies and implementation measures serve as the mitigation measures for potential significant environmental impacts identified in this EIR" (DEIR, p. 36). The EIR also notes that those measures are monitored through a number of monitoring processes, including County review of future development projects and building permits for compliance with the General Plan, Area Plans, and Specific Plans. Development must also comply with the standards established in the Basin Plan for the installation of sewer and water systems. The General Plan contains a number of policies intended to protect the County's resources, including policies which require development to avoid or reduce impacts to water resources, e.g.:

Future development projects shall avoid potential significant impacts to local surface and groundwater resources or mitigate impacts to a level of non-significance, unless a statement of overriding considerations is made through the EIR process.

(Mono County General Plan, Conservation/Open Space Element, Water Resources and Water Quality Objective B, Policy 5)

Future development projects with the potential to significantly impact surface or groundwater resources shall assess any potential impacts prior to project approval. Examples of potential significant impacts include:

- 1) *substantially degrading or depleting surface or groundwater resources; and/or*
 - 2) *interfering substantially with groundwater recharge.*
- (Mono County General Plan, Conservation/Open Space Element, Water Resources and Water Quality Objective B, Policy 5, Action 5.1)*

Future development projects shall avoid potential significant impacts to water quality or mitigate impacts to a level of non-significance, unless a statement of overriding considerations is made through the EIR process.

(Mono County General Plan, Conservation/Open Space Element, Water Resources and Water Quality Goal II, Objective A, Policy 1)

Future development projects with the potential to significantly impact water quality shall assess the potential impact(s) prior to project approval. Examples of potential significant impacts include:

- 1) *substantially degrading water quality; and/or*
- 2) *contaminating a public water supply; and/or*
- 3) *causing substantial flooding, erosion or siltation.*

In areas determined by the County to be of special significance, such an analysis and associated mitigation measures may be required even if the proposed project conforms to water quality standards established by the Lahontan Regional Water Quality Control Board for the project area.

(Mono County General Plan, Conservation/Open Space Element, Water Resources and Water Quality Goal II, Objective A, Policy 1, Action 1.1)

2. The DEIR concludes (p. 34) that the proposed land use amendments would not contribute to cumulative impacts. In contrast, wetlands and several major surface water bodies in Mono County (e.g., Bridgeport Reservoir, West Walker River, and others) have been significantly degraded due to cumulative effects, and these effects could intensify if buildout were increased as proposed for some areas. Increases in development of wetlands, and/or increases in sediment and/or nutrient discharges (from septic systems, erosion, fertilizers, or other sources) would exacerbate existing adverse cumulative effects. The DEIR does not provide sufficient information or analyses to support its conclusion that the proposal will not contribute to cumulative impacts in areas where buildout would be increased.

"A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g. water quality plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency."

[CEQA Guidelines Section 15064 (i)(3)]

Development in Mono County is required to comply with the Water Quality Control Plan for the Lahontan Region (Basin Plan) in order to avoid potential impacts to the County's water resources. The project's potential incremental contribution to cumulative water quality impacts, such as sediment and/or nutrient discharges, will not be cumulatively considerable since future development allowed by the project will comply with adopted standards in the Lahontan Water Quality Control Plan (Basin Plan).

Specific comments

1. Water Quality Standards. The 1999 Master Environmental Assessment (MEA) incorrectly references the applicable water quality standards. The MEA references two 1975 Water Quality Plan Reports, both of which have been rescinded by the RWQCB. The current state water quality standards (including beneficial use designations, water quality objectives, waste discharge prohibitions, and other implementation programs) are found in a single volume, the *Water Quality Control Plan for the Lahontan Region* (commonly referred to as the "Basin Plan"), which has been in effect since March of 1995. Your office should have a copy of this Basin Plan. Please contact us if you need assistance interpreting or understanding its requirements.

The incorrect reference to the 1975 Water Quality Plan Reports in the MEA is an oversight which will be corrected. The County is aware that current state water quality standards are contained in the Water Quality Control Plan for the Lahontan Region (Basin Plan); appropriate County departments (e.g., Planning, Environmental Health) have copies of the Basin Plan and utilize those standards in reviewing and approving proposed development projects.

The wetlands policies and protection measures contained in the current 1995 Basin Plan are substantially changed from the former (1975) plans referenced in the MEA. The potential environmental effects of the proposal should therefore be reevaluated in light of the current wetlands policies. The Basin Plan's current wetlands policies have bearing on the significance of the impacts of the proposed changes to zoning, and increases in buildout, proposed for several planning areas.

As noted above, the County reviews plans and environmental documents, including the DEIR for the Land Use Plan Amendments, utilizing the standards and policies contained in the 1995 Basin Plan.

In correcting your MEA, it should also be noted that, in addition to the state water quality standards contained in the Basin Plan, the U.S. Environmental Protection Agency's "National Toxics Rule" also applies for some priority pollutants (e.g., metals, toxic organic compounds).

This information will be included in the MEA.

2. Bridgeport Valley and Bodie Hills Planning Areas. Bridgeport Reservoir is listed under Section 303(d) of the federal Clean Water Act (CWA) as "impaired," due to cumulative inputs of sediment and nutrients. Bridgeport Reservoir is experiencing ongoing violations of at least eleven water quality objectives contained in the Basin Plan (e.g., ammonia total nitrogen, total phosphorus, total dissolved solids, dissolved oxygen, turbidity, temperature, pH, biostimulatory substances, floating materials, taste & odor). Many of the violations are due to accelerated eutrophication caused by cumulative inputs of sediment and nutrients from the watershed. In addition to the ongoing violations of water quality objectives, significant adverse impacts to beneficial uses (i.e., algae blooms, nuisance conditions, fish kills, etc.) are also occurring at Bridgeport Reservoir due to the effects of cumulative nutrient and sediment loads.

It is acknowledged that Bridgeport Reservoir is experiencing ongoing water quality violations as identified above. There may be multiple sources of pollution; the primary cause being, most likely, increased organic nutrients in the tributaries of Bridgeport Reservoir.

The DEIR needs to be supplemented to include a careful analysis of the potential for zoning changes and increased buildout in the Bridgeport Valley and the Bodie Hills planning areas to contribute to the cumulative sediment and/or nutrient loading to Bridgeport Reservoir or its tributaries. Any increase in sediment or nutrient loads to tributaries of Bridgeport Reservoir should be considered cumulatively significant impacts to water quality. Potential sediment sources from new developments include, but are not limited to, erosion from areas disturbed during construction, long-term erosion from cut/fill slopes, and long-term erosion from the traveled surface of unpaved roads or other disturbed areas. Potential nutrient sources from new developments include, but are not limited to, wastewater disposal (i.e., septic systems and/or increased discharges from the community sewer system), fertilizers, and livestock wastes. The MEA (p. 176) acknowledges the "widespread inadequacy of individual septic tank/leach field systems" in Mono County, and the potential for "nutrient additions to surface waters" due to discharges from septic systems, but neither the MEA nor the DEIR evaluate the potential for cumulatively significant increases in nutrient loads due to the proposed zoning changes and increases in buildout.

See previous responses concerning a) the degree of specificity required in a General Plan EIR, b) the determination that water quality impacts will not be cumulatively considerable since future development will comply with adopted water quality standards in the Lahontan Regional Water Quality Control Plan (Basin Plan), and c) the General Plan policies which require development to avoid or reduce water quality impacts.

The increased buildout proposed for the Bridgeport Valley (i.e., allowing agricultural lands to be developed into 40-acre parcels, and re-zoning certain areas to create "expansion areas" for the community of Bridgeport), and the zoning changes proposed for the Bodie Hills (i.e., changing zoning from "Resource Management" to allow residential and resort development on individual septic systems) pose the potential to further degrade the water quality of Bridgeport Reservoir and its tributaries. The DEIR should be supplemented to carefully evaluate the potential direct, indirect, and cumulatively significant impacts to water quality and beneficial uses of water posed by the proposals to change zoning and increased buildout in the watershed of Bridgeport Reservoir.

See previous responses.

3. Antelope Valley Planning Area. The West Walker River and Topaz Lake are listed under Section 303(d) of the federal Clean Water Act (CWA) as "impaired," due to sedimentation/siltation. The increase in buildout proposed for the Antelope Valley poses the potential to exacerbate sediment inputs to the West Walker River and Topaz Lake. Potential sediment sources from new developments include, but are not limited to, short-term erosion from areas disturbed during construction, and long-term erosion from cut/fill slopes, the traveled surface of unpaved roads, confined animal facilities, or other disturbed areas

It is acknowledged that the West Walker River and Topaz Lake are experiencing ongoing water quality violations as identified above.

See previous responses concerning a) the degree of specificity required in a General Plan EIR, b) the determination that water quality impacts will not be cumulatively considerable since future development will comply with adopted water quality standards in the Lahontan Regional Water

Quality Control Plan (Basin Plan), and c) the General Plan policies which require development to avoid or reduce water quality impacts.

The 1993 General Plan for Mono County calculated buildout at Antelope Valley based on one dwelling unit per 40 acres of agricultural land. The current proposal would allow development of 10-acre parcels on these lands. The DEIR should be supplemented to carefully evaluate the potential direct, indirect, and cumulatively significant impacts to sediment loads posed by the proposal to change zoning and increase buildout in the Antelope Valley.

See previous responses.

4. Wetlands. The proposals to allow increased buildout on agricultural lands and to change zoning to allow residential development instead of "Resource Management" in portions of the Bridgeport Valley, Antelope Valley, Bodie Hills, and Mono Basin north area pose the potential to cause direct, indirect, and cumulative effects to wetlands. The MEA (p. 255) acknowledges that wetlands contain "special natural communities" and "special habitats". Wetlands also provide many other benefits to the people of California such as flood peak attenuation, flood water storage, nutrient removal, sediment retention, and ground water recharge (see Basin Plan at p. 4.9-8). Wetlands in the eastern Sierra have been significantly impacted by past development activities. Any further adverse impacts to wetlands in Mono County should be considered cumulatively significant effects. It should be noted that compliance with the mitigation requirements of the Army Corps of Engineers and the Basin Plan will not automatically offset incremental adverse impacts to wetlands. The DEIR should be supplemented to carefully evaluate the potential direct, indirect, and cumulatively significant impacts to wetlands posed by the proposals to change zoning and increased buildout in the Bridgeport Valley, Antelope Valley, Bodie Hills, and Mono Basin North Planning Areas.

Mono County recognizes the importance of wetlands in the Eastern Sierra. The Mono County Wetlands Study (EIP Associates, 1992) identifies wetlands throughout the County. Development in areas with wetlands must comply with all applicable Federal, State, and Local regulations concerning wetlands.

In addition, the Mono County General Plan contains policies to avoid or reduce impacts to wetlands, e.g.:

Guide development in the Bridgeport Valley so that no net loss of wetlands functions and values or acreage results from development activities.

(Mono County Land Use Element, Bridgeport Area Wetlands Policies, Objective A)

Future development projects shall avoid potential significant impacts to animal or plant habitats or mitigate impacts to a level of non-significance, unless a statement of overriding considerations is made through the EIR process.

(Mono County General Plan, Conservation/Open Space Element, Biological Resources, Objective A, Policy 1)

Future development projects with the potential to significantly impact animal or plant habitats shall assess site-specific resource values and potential impacts prior to project approval. Examples of potential significant impacts include:

- 1) *substantially affecting a rare or endangered species of animal or plant or the habitat of the species; and/or*
 - 2) *interfering substantially with the movement of any resident or migratory fish or wildlife species; and/or*
 - 3) *substantially diminishing habitat for fish, wildlife, or plants.*
- (Mono County General Plan, Conservation/Open Space Element, Biological Resources, Objective A, Policy 1, Action 1.1)*

Summary and conclusions

The proposals to change zoning and increase buildout in several planning areas pose the potential for direct, indirect, and cumulative effects to water quality that are not adequately evaluated in the DEIR or MEA.

The County's Master Environmental Assessment (MEA) is intended to document existing environmental conditions throughout the county. Information contained in the MEA is to be used during the environmental review of projects; the MEA is not intended to evaluate or analyze potential project impacts.

If the DEIR is not supplemented to adequately evaluate and mitigate these potential effects, the RWQCB may require detailed site-specific CEQA documents for future developments in these planning areas prior to granting any necessary approvals. If the DEIR and MEA are not supplemented as discussed, the county should commit to requiring detailed site-specific CEQA documents for developments in the planning areas discussed in these comments, rather than allowing such development to tier off of the MEA and General Plan EIR.

The General Plan EIR is intended to analyze the overall impacts of designating private lands in the Mono County with certain land use designations. It is not intended to analyze site-specific issues or to act as the only environmental analysis for future development on private lands in the County. Depending on the type and scale of future development, that development will require site-specific environmental analysis in compliance with CEQA.

Please supplement your DEIR to incorporate the above comments, and provide copies of all environmental and decision documents to me at the letterhead address. Please call Tom Suk at (530) 542-5419, or Dr. Judith Unsicker at (530) 542-5417 if you have any questions regarding these comments

Sincerely,
Cindy Wise, E Environmental Specialist IV
Acting Lead, Southern Watersheds Unit

cc: Regional Board Members
Mosie Boyd, State Clearinghouse

LU Amendment EIR

Desert Survivors
Oct. 30, 1999

To: Mono County Planning Dept.
Attn: Keith Hartstrom
POB 8
Bridgeport, CA 93517

Dear Mono County--

I am writing as a representative of Desert Survivors, a 900-member hiking and environmental group located in Oakland, CA. Our group makes frequent (15+ thus far) backpacking, car-camping, and "service" trips to Mono Lake, Crowley Reservoir, Bodie Hills, and eastern portions of the county. Our "service" trips in Mono County have included assisting the Bureau of Land Management with revegetation efforts at Crowley Reservoir, and fencing off springs from cattle in the Bodie Hills.

Desert Survivors is very concerned about the Draft Environmental Impact Report (DEIR) for the Mono County General Plan Land Use amendments (SCH# 98122016). Efforts to change zoning, especially in the Bodie Hills, will result in significant negative impacts to biological resources and viewshed.

Desert Survivors wants to express a formal complaint regarding the Mono County "noticing" process, which does not target many members of the concerned public. Many county decisions affect adjacent public lands. Our group did not receive any formal notice of preparation regarding the DEIR despite our persistent interest in the Bodie Hills, which is discussed in more detail below. In future, we would like to be placed on the county mailing list for all environmental documents to receive public review. The address for receiving notices is :

Desert Survivors
POB 20991
Oakland, CA 94620-0991

Desert Survivors will be placed on mailing lists to receive environmental documents.

Also, we requested the electronic version of the plan from Mr. Keith Hartstrom, and received only a one-page attachment regarding signage! We sent an email response requesting the appropriate documents as well as an extension, and never received a response.

Mr. Hartstrom repeatedly emailed and mailed you the appropriate documents. As he replied in an email to you dated October 20, 1999, the comment period was extended 15 days as you requested, from October 15, 1999, to October 31, 1999.

The zoning code and land use designations proposed in the DEIR are not "minimal" (p. 1). The DEIR states that impacts under this plan would be less than the 1993 General Plan (DEIR, p. 3) because overall density would be decreased, yet it is clear from the proposed changes to Bodie Hills inholdings that sprawl would be greatly escalated.

The proposed changes to the Bodie Hills inholdings would result in an increase of approximately 40 dwelling units (current land use designations permit 360 dwelling units; proposed land use

designations with development credits program permit 400 dwelling units--see corrected Table 3--Bodie Hills in the FEIR). "Sprawl" would actually be reduced because the development credits program requires development to be clustered.

The AG designation and the Transfer of Development Credits Program proposed in the 1999 Amendments to the Land Use Element were developed by the Bodie Area Planning Advisory Committee (BAPAC), an appointed public advisory committee, as part of the planning process for the Bodie Hills Planning Area. The BAPAC was commissioned by the Mono County Board of Supervisors, in consultation with the BLM, to develop land use policy recommendations for the 7,300 acre Bodie Bowl Area of Critical Environmental Concern (ACEC) and the larger Bodie Hills Planning Area (approximately 128,500 acres--17,000 acres of private lands, 500 acres of State lands, 104,000 acres of public lands managed by the BLM, and 7,000 acres of public lands managed by the Toiyabe National Forest). The BAPAC was composed of individuals representing a wide variety of interests, including local landowners, mining interests, environmentalists, historic preservationists, tourism, etc..

The intent of the AG designation is to preserve and encourage agricultural uses, to protect those uses from becoming subject to urban development, and to provide for the orderly growth of activities related to agriculture. The Transfer of Development Credits Program assigns a certain number of development credits to each parcel based on an established formula; this supercedes the density of 1 dwelling unit per 2.5 acres and a secondary unit allowed by the General Plan on AG parcels. The formula for assigning Development Credits is included in the Bodie Hills land use policies under Objective I (see Draft Revised Land Use Element, p. 60).

Each development credit (DC) permits the construction of one single family residence. Development credits may be transferred to parcels as small as one acre in size. Development credit parcels should be clustered as follows:

- adjacent to existing residential development if feasible.*
- with a buffer established in consultation with adjacent agricultural landowners.*
- to avoid steep slopes and fault hazard areas.*
- to avoid wetlands and areas subject to flooding.*
- away from visually sensitive areas, such as ridgelines or along scenic highways.*
- to minimize impacts to wildlife, including migrating deer.*
- to minimize impacts to cultural resource sites.*
- proximate to existing access and utilities if feasible.*
- on soils of sufficient structural and sanitary waste disposal capabilities.*

A higher-density alternative (p. 3) should be explored in this document.

The California Environmental Quality Act (CEQA) requires an EIR to:

" ... describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." (CEQA Guidelines Section 15126.60

As noted under Project Alternatives in the DEIR (see Chapter IV, Impact Summary, pp. 34-35), a higher-density alternative was considered but was considered unfeasible since it would not avoid or substantially lessen any of the significant effects of the project. "Higher density" was considered to mean an overall higher density than that proposed in the DEIR. The comment

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appears to use "higher-density" to mean clustered development intended to concentrate development in already developed areas, thereby providing higher density in those areas. Consistent application of the proposed amended land use designations, in compliance with General Plan policies, focuses development in developed community areas and provides areas of higher density development (e.g. parcels designated Multiple Family Residential, Mixed Use, Commercial, and Commercial Lodging).

Desert Survivors is strongly opposed to changing the majority of the land use designations in the Bodie Hills from Resource Management to Estate Residential, Rural Resort, and Agriculture (p. 22).

The DEIR contains an error concerning proposed designations for the Bodie Hills. The second bulleted item under Bodie Hills on p. 22 of the DEIR should read as follows:

- *Most land was designated Resource Management (RM) in the 1993 General Plan. It is now designated Rural Resort (155 acres) and Agriculture (14,251 acres).*

Table 3--Bodie Hills, on p. 43 of the DEIR, has also been corrected to show that the only designations for the Bodie Hills are RU and AG.

Our comments regarding the Specific Plan designations are already incorporated under our comments in response to the Revised Bodie Hills RV Park Specific Plan and Environmental Impact Report.

The proposed Bodie Hills RV Park is a separate project; the Specific Plan and EIR for that project will be considered separately by the Planning Commission and Board of Supervisors. Your concerns about the proposed Specific Plan designations are addressed in the FEIR for that project. The subject parcel for that project is proposed for designation as Rural Resort (RU) in the 1999 General Plan Amendments. The RU designation is consistent with the Bodie Hills policies and land use designations developed by the Bodie Area Planning Advisory Committee which have been incorporated into the 1999 General Plan Amendments.

It is unclear from the DEIR how many housing units/ac. will be allowed in those areas zoned for Agriculture; the DEIR states that a development credit program established in the Hammil Valley will be utilized (DEIR, p. 23). This must be clarified in the final EIR. Allowance of one unit/10 acres, such as has been proposed for Antelope Valley, is not acceptable. Due to the elevation, it would not be possible to support economically feasible agriculture on such small parcels.

Land Use Maps 41-44, which cover the Bodie Hills Planning Area, show how many Development Credits will be allowed for each parcel designated AG. The legend for these maps will be amended to indicate that the numbers shown in the AG designated parcels (i.e. 5 dc, etc.) indicate the number of Development Credits allowed for each parcel. See previous responses concerning the development credits program.

According to our calculations, the changes proposed in the DEIR will affect 14,251 acres (from DEIR p. 22). The DEIR dismisses any negative impacts by stating that "the overall building impact is relatively small" (p. 28), thereby failing to discuss impacts to wildlife and viewshed from sprawled development.

The proposed changes in the Bodie Hills affect all private lands in the planning area, i.e. 14,406 acres. The 155-acre parcel designated Rural Resort (the Bodie Hills RV Park parcel) is

designated Resource Management (RM) in the existing General Plan. See previous responses concerning the proposed designations for the Bodie Hills and the issue of "sprawl".

It should be noted that CEQA recognizes that the level of analysis which is reasonably feasible in a General Plan EIR will, from necessity, be more general than that which is reasonably feasible in a project-specific EIR; "the degree of specificity in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR" (CEQA Guidelines Section 15146). The proposed General Plan Land Use amendments assign land use designations to private lands in the County; they do not specify how or where development may occur on those lands. It would be speculative to include more detailed analysis in the DEIR; an EIR is not required to be speculative in its analysis [CEQA Guidelines Section 15126.6 (c)].

In addition, the Mitigation Monitoring Program in the DEIR notes that "Mono County General Plan goals, objectives, policies and implementation measures serve as the mitigation measures for potential significant environmental impacts identified in this EIR" (DEIR, p. 36). The EIR also notes that those measures are monitored through a number of monitoring processes, including County review of future development projects and building permits for compliance with the General Plan, Area Plans, and Specific Plans.

The General Plan contains a number of policies intended to protect the County's resources, including policies which require development to avoid or minimize impacts to wildlife and to visual resources, e.g.:

"Future development projects shall avoid potential significant impacts to animal or plant habitats or mitigate impacts to a level of non-significance, unless a statement of overriding considerations is made through the EIR process."

(Conservation/Open Space Element, Biological Resources, Objective A, Policy 1)

"Future development projects with the potential to significantly impact animal or plant habitats shall assess site-specific resource values and potential impacts prior to project approval. Examples of potential significant impacts include:

- 1) substantially affecting a rare or endangered species of animal or plant or the habitat of the species; and/or*
- 2) interfering substantially with the movement of any resident or migratory fish or wildlife species; and/or*
- 3) substantially diminishing habitat for fish, wildlife, or plants."*

(Conservation/Open Space Element, Biological Resources, Objective A, Action 1.1)

"Future development projects shall avoid potential significant visual impacts or mitigate impacts to a level of non-significance, unless a statement of overriding considerations is made through the EIR process."

(Conservation/Open Space Element, Visual Resources, Objective C, Policy 1)

"Future development projects with the potential to have a substantial, demonstrable negative aesthetic effect shall provide a visual impact analysis prior to project approval. Examples of a substantial, demonstrable negative aesthetic effect include:

- 1) Reflective materials;*
- 2) Excessive height and/or bulk;*
- 3) Standardized designs which are utilized to promote specific commercial activities and which are not in harmony with the community atmosphere;*

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- 4) *Architectural designs and features which are incongruous to the community or area and/or which significantly detract from the natural attractiveness of the community or its surroundings;*
 - 5) *Dust or steam plumes; and*
 - 6) *Excessive night lighting."*
- (Conservation/Open Space Element, Visual Resources, Objective C, Action 1.1)*

The Bodie Hills harbors many sensitive plant and animal species which will be heavily impacted by increased development. Secondary impacts, such as the increase in fences, dogs, and cats, and reduction in groundwater resources must be fully addressed in the final EIR. In addition to those species protected by the Endangered Species Act, the Bodie Hills provides a major migratory corridor for the Mono Lake deer herd (Taylor, 1997), as well as habitat for pronghorn antelope and sage grouse. Hunting of these three species provides important revenue for Mono County businesses (see Loft 1998). Additionally, sage grouse may soon be listed as threatened or endangered.

See response to the previous comment.

The currently pristine and undeveloped viewshed of the Bodie Hills will be significantly impacted by the proposed sprawl development. A number of these parcels are located on roads leading into the ghost town of Bodie. The wild and expansive vistas are part of the "Bodie Experience". Please see Desert Survivors comments by Drumm and Strauss 1999 on the Bodie RV Park to Mono County regarding the viewshed value.

See previous response concerning "sprawl" and the level of specificity required in a General Plan EIR. In addition, see responses to comments on the Bodie RV Park SP/EIR concerning the viewshed value, particularly responses to Desert Survivors/Drumm, Desert Survivors/Strauss, and responses under the headings Bodie Experience and Visual/Scenic Values.

The DEIR is deficient because it does not adequately address impacts to water quality in Bridgeport Reservoir and Bodie Hills creeks by the increase in septic systems.

The installation of septic systems must comply with the "Criteria for Individual Waste Disposal Systems" contained in the Lahontan Water Quality Control Plan (Basin Plan). The Mono County Health Department has been given the authority by the Regional Water Quality Control Board (RWQCB) through Memoranda of Understanding ,to review, process and permit land developments that only discharge domestic waste. The requirements in the Basin Plan were designed to avoid potential impacts to water resources, including Bridgeport Reservoir or its tributaries.

All rezoning should include the addition of restrictions such as riparian and creekside setbacks. A minimum setback of 150' from the bank (using "bank" as defined by the Calif. Dept. of Fish and Game criteria for streambank alterations) must be established. Wildlife movement/migration corridors must be maintained. Fencing and grazing must be restricted/designated so that vegetation and wildlife are not impacted. Restrictions on pets (both cats and dogs) must be clearly delineated to prevent impacts to migratory birds, and upland game species. Building on ridgelines must be prohibited to protect the viewshed. All powerlines must be underground.

See previous response concerning the application of Mono County General Plan goals, objectives, policies and implementation measures as mitigation measures for potential significant environmental impacts identified in this EIR. General Plan policies address the preservation of wildlife movement corridors (see previous responses), impacts to vegetation and wildlife,

including migratory birds and upland game species (see previous responses), and powerlines (Conservation/Open Space Element, Visual Resources, Objective C, Policy 3, Actions 3.1-3.8).

In addition, the 1999 General Plan Land Use Amendments include the integration of the existing Mono County Zoning Code into the General Plan as Section VI of the Land Use Element. The Zoning Code has been renamed Land Development Regulations but the requirements remain unchanged from the existing requirements. The Land Development Regulations address the following:

- Stream setbacks See Special Yard Requirements, Streams/Creeks (04.130.7), requires a setback from intermittent and permanent streams as shown on US Geological Survey maps.*
- Cats and Dog See Animal Standards (04.270), limits the number of animals onsite.*
- Powerlines See Chapter 11, Development Standards--Utilities. Requires utility lines to individual developments and new subdivisions to be installed underground unless hardship can be proven and a Director Review Permit or a Variance is approved for overhead installation.*

Hiking access to public lands must be preserved.

Hiking access will not be affected by the proposed changes.

We do not agree with findings of the DEIR that impacts will be decreased relative to the 1993 General Plan (DEIR p. 30) because of the inherent increased impacts of sprawl. The DEIR is inadequate because it does not fully acknowledge impacts from sprawl, or to wildlife, plants, and viewshed. A supplemental DEIR must be prepared to address these issues.

See previous responses concerning "sprawl" and impacts to wildlife, plants, and viewshed.

The DEIR proposes changes that will permanently damage values of adjacent public lands--values that belong to all residents of the U.S., not just citizens of Mono Co.

Sincerely,
Emilie Strauss
Bodie Task Force Chairperson
1606 Hearst Ave.
Berkeley, CA 94703

Literature Cited

- Loft, E.R. 1998. Economic Contribution of deer, pronghorn antelope, and sage grouse hunting to northeastern California and implications to the overall "value" of wildlife. Calif. Wildlife Cons. Bull. II. Calif. Fish and Game, Sacramento, CA.
- Taylor, T. 1997. Wildlife Assessment Survey at the Bodie Hills RV Park, Mono County Planning Dept., Mammoth Lakes, CA.

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10-26-99

Dear Mono County Planning Department

I have reviewed the Mono County General Plan Land Use Element Update and would like to offer the following comments.

I applaud the County's realization that the Bodie Hills are a unique resource deserving of special management and protection. Indeed, this meeting of the Great Basin and Sierra ecotypes is of enough biological and geologic (and needless to say, historic) significance to warrant future further protection under the arms of the State or National Parks (someday perhaps a "Bodie-Great Basin State Park"?).

I understand that a group of folks were drawn together to plot the management of the Bodie Hills. I also have been told that the focus of this group support of consumptive use and development at the expense of conservation and land stewardship and that their final report was not reflective of group consensus.

The Bodie Bowl Area of Critical Environmental Concern and Bodie Hills Planning Area: A Recommended Cooperative Management Plan (Draft, 1994) was prepared by the Bodie Area Planning Advisory Committee (BAPAC), an appointed public advisory committee. The BAPAC was commissioned by the Mono County Board of Supervisors, in consultation with the BLM, to develop land use policy recommendations for the 7,300 acre Bodie Bowl Area of Critical Environmental Concern (ACEC) and the larger Bodie Hills Planning Area (approximately 128,500 acres--17,000 acres of private lands, 500 acres of State lands, 104,000 acres of public lands managed by the BLM, and 7,000 acres of public lands managed by the Toiyabe National Forest). The BAPAC was composed of individuals representing a wide variety of interests, including local landowners, mining interests, environmentalists, historic preservationists, tourism, etc.. The Committee, through numerous public meetings, developed the Draft Plan. Policies pertaining to the Bodie Hills have since been incorporated into the 1999 Draft Mono County General Plan Land Use Element Amendments.

I opposed, and ask you to reconsider, the re-zoning of the private property within the Bodie Hills from Resource Management (RM) to Agriculture (AG). This is not agricultural land and that designation is not appropriate. An AG designation here appears to be for the sole purpose of allowing land to be divided into much smaller parcels (2.5 acres vs. 40 acres) for more intensive development. With AG zoning dwelling units are scattered over every single parcel within the Bodie Hills, contributing greatly to the fragmentation and degradation of resource values.

Private parcels in the Bodie Hills which are currently designated Resource Management (RM) in the 1993 Land Use Element of the General Plan are proposed for designation as Agriculture (AG) with a Transfer of Development Credits Program in the 1999 Amendments to the Land Use Element (see Land Use Maps 41, 42, 43, and 44). The proposed changes to the Bodie Hills inholdings would result in an increase of approximately 40 dwelling units (current land use designations permit 360 dwelling units; proposed land use designations with development credits program permit 400 dwelling units--see corrected Table 3--Bodie Hills in the FEIR). "Sprawl" would actually be reduced because the development credits program requires development to be clustered.

The intent of the RM designation is to recognize and maintain a wide variety of values in the lands outside existing communities. The "RM" designation indicates that the land may be valuable for uses including but not limited to recreation, surface water conservation,

groundwater conservation and recharge, wetlands conservation, habitat protection for special status species (both plants and animals), wildlife habitat, visual resources, cultural resources, geothermal resources, or mineral resources. In other cases, the land may need special management consideration because of the presence of natural hazards in the area, such as avalanche prone areas, earthquake faults, flood hazards, or landslide or rockfall hazards. The RM designation allows 1 dwelling unit per 40 acres along with a secondary unit.

The AG designation and the Transfer of Development Credits Program proposed in the 1999 Amendments to the Land Use Element were developed by the Bodie Area Planning Advisory Committee. The intent of the AG designation is to preserve and encourage agricultural uses, to protect those uses from becoming subject to urban development, and to provide for the orderly growth of activities related to agriculture. The Transfer of Development Credits Program assigns a certain number of development credits to each parcel based on an established formula; this supercedes the density of 1 dwelling unit per 2.5 acres and a secondary unit allowed by the General Plan on AG parcels. The formula for assigning Development Credits is included in the Bodie Hills land use policies under Objective I (see Draft Revised Land Use Element, p. 60).

Each development credit (DC) permits the construction of one single family residence. Development credits may be transferred to parcels as small as one acre in size. Development credit parcels should be clustered as follows:

- adjacent to existing residential development if feasible.*
- with a buffer established in consultation with adjacent agricultural landowners.*
- to avoid steep slopes and fault hazard areas.*
- to avoid wetlands and areas subject to flooding.*
- away from visually sensitive areas, such as ridgelines or along scenic highways.*
- to minimize impacts to wildlife, including migrating deer.*
- to minimize impacts to cultural resource sites.*
- proximate to existing access and utilities if feasible.*
- on soils of sufficient structural and sanitary waste disposal capabilities.*

Since AG designation allows 1 dwelling unit per 2.5 acre verses the 1 du/40 acres allowed under RM zoning; this would create a significant increase in the amount of allowable development within the Bodie Hills. Looking at numbers, that's 5,518 du for Agricultural verses 344 for Resource Management! While the plan does indicate that the maximum potential dwelling units will be limited to 377, that number is still represents a significant increase in dwelling density.

See response to previous comment. The maximum potential dwelling units under the existing Resource Management designation is 360 (see Table 3--Bodie Hills in the DEIR). The maximum potential dwelling units under the proposed AG designation is 400, an increase of 40 dwelling units.

If it is appropriate for the surrounding Federal and State lands to retain the Resource Management designation, it is appropriate for the private lands too. The Bodie Hills should be managed as a unit and not splintered with multiple zoning.

This comment will be considered during the decisionmaking process on the rezoning.

RM designation is not significantly more restrictive in allowable uses than is AG; it should be noted that limited scale lodging is permitted under a RM zoning.

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The RM designation permits the following uses subject to Use Permit: "Limited scale lodging, such as small inns, bed and breakfast establishments, and cabins, if found to be compatible by the commission" (1999 Land Use Amendments).

The 430 acres of Rural Resort designation were not identified on the maps included with the MCGP Land Use Update. Since this zoning designation could profoundly change the management of the Bodie Hills I request that the maps be reissued with the RU areas clearly indicated and the public comment period extended to allow for the digestion of and comment on these areas.

The 430 acres of Rural Resort designation listed in Table 3--Bodie Hills and in the DEIR text is an error from an earlier draft of the 1999 Land Use Amendments. Only one parcel in the Bodie Hills is proposed for designation as Rural Resort (RU). That parcel is located just east of the junction of Hwy. 395 and Hwy. 270 (the Bodie Road) and is the 155-acre parcel on a portion of which the Bodie Hills RV Park is proposed (see Land Use Map 43). The 155-acre parcel is shown as RU on the maps and as SP in Table 3. Table 3 will be corrected to identify the parcel as RU.

I am concerned about the future of the Bodie Hills. The Planning Commission used a "statement of overriding considerations" and the Specific Plan process to allow a significant visual degradation of Bodie Road (and the gateway to Bodie Park) with the proposed Bodie Hills RV Park. This action makes me fear that, without strong protection, the Bodie Hills will be invaded by one development after another.

The Bodie Hills RV Park Specific Plan and EIR has not been adopted, nor has a Statement of Overriding Considerations for the project. In 1997, the Planning Commission recommended approval of the original Specific Plan with modifications and recommended approval of a Statement of Overriding Considerations upon finding the project would result in significant unavoidable visual impacts. The Board of Supervisors then considered the project but took no action; i.e. no Statement of Overriding Considerations has been adopted for the project.

Since the hearings on the original document in 1997, the project has been revised and a Revised Specific Plan/EIR has been circulated for public comment. The Final EIR for the project is in the process of being completed; public hearings on the project will occur in the near future. In the decisionmaking process on the revised project, the Planning Commission and, ultimately, the Board of Supervisors, will need to adopt, reject, or modify proposed alternatives and mitigation measures and may then need to make a finding that the project will result in significant unavoidable effects. If such a finding is made and the project is approved, the Board will need to adopt a Statement of Overriding Considerations at that time.

Additional private lands in the Bodie Hills are widely dispersed and, in most cases, not on the Bodie Road. If the parcels remain RM, their use will be limited to non-developed uses unless a Specific Plan is approved. If the proposed AG designation is approved, additional agriculturally oriented development could occur. Leap-frog commercial development is unlikely to occur since the land is not designated for commercial uses.

The issue of future development in the Bodie Hills, particularly as it relates to the proposed Bodie Hills RV Park, is also addressed in the FEIR for the Bodie Hills RV Park Specific Plan.

An Agricultural zoning will degrade the very qualities of the Bodie Hills that the County claims it is wants to protect. I urge you to retain the Resource Management (RM) designation of all lands within the Bodie Hills.

Your comments will be considered during the decisionmaking process on the rezoning.

Sincerely
Mark Langner
POB 581 Bridgeport Ca 93517 760-647-6142

LU Amendment EIR

From: Squaw Valley Realty <svrealty@ltol.com>
To: northmono@qnet.com <northmono@qnet.com>
Date: Sunday, October 31, 1999 5:11 PM
Subject: Mono County General Plan Land Use Element Update

Dear Keith,

I am a landowner in the southeastern portion of the Bridgeport Valley and am concerned about any expansion of mixed use zoning in the valley. I am particularly concerned about the parcels south of the existing Chalet Motel and Infant of Prague church. These parcels should remain in their current Estate Residential status. There is no justification to allow the current commercial district in Bridgeport to expand. A large portion of this district is defunct and the balance is seasonal at best.

The Planning Commission, during hearings on the proposed rezoning for the Bridgeport Valley, rejected requests to change the land use designation/zoning for parcels south of the existing Chalet Motel and Infant of Prague Church, stating that the request was an effort to extend strip commercial development and the parcels were too far outside of the core commercial area in Bridgeport. The issue may be revisited during hearings on the Final Environmental Impact Report (FEIR) for the rezoning.

Any expansion of this district is not in the interest of the town, the county, and more importantly the people of California and the world. The eastern Sierra is an incredible gem in the world landscape and we bear a responsibility to try not to tarnish it. The greatest assets of Bridgeport are its compact "small town" ambiance, and the scenic and recreational resources that it offers. Adding to the sprawl merely increases the likelihood of tourist dollars fleeing rather than patronizing town. Mono County is one of the few counties in the state that has the opportunity to prevent the sprawl that has plagued most of once rural California and has now spread to western Nevada.

Your comments will be considered during the decisionmaking process on the rezoning.

I also have serious concerns about the proposed RV Park at the Bodie intersection. Have Willow Springs, the Settlement and the Twin Lakes parks enjoyed such overwhelming successes and overcrowding to justify the creation of such a grandiose scheme? Is this proposal in line with the ghost town/old west flavor of Bodie? I think that traditional sheepherding is more appropriate than an RV Park. It also looks to me as if much of the area proposed overlies wetland and riparian area. I support maintaining the existing resource management designation for this area.

The proposed Bodie Hills RV Park is a separate project; the Specific Plan and EIR for that project will be considered separately by the Planning Commission and Board of Supervisors. Your concerns about the viability of the project, its compatibility with Bodie, and the occurrence of wetlands and riparian areas onsite are addressed in the FEIR for that project. No wetlands have been identified onsite (Mono County Wetlands Study, 1992); riparian areas onsite are contained in a defined stream corridor designated as Open Space in which no development will occur.

I know that as planners you have spent endless hours going over these issues and try to weigh the interests of everyone involved, and certainly the local special interests (that are in attendance at the meetings) carry alot of weight. Looking from the broader perspective, of the people of the world, I think that it is important to give special consideration to the impacts of the general plan. Every year, I personally bring people from all over the world to the Eastern Sierra. Whatever we can do now to maintain this area as a destination, will serve all of us into the future.

Your comments will be considered during the decisionmaking process on the rezoning.

Please notify us of any pending developments regarding these issues. Thanks for your attention, Keith.

Sincerely,
Glen Poulsen
PO Box 2008
Olympic Valley, CA 96146
530-583-3451
530-583-2040 fax
sv realty@lto1.com

hardcopy to follow by US mail.

MEMORANDUM

TO: PLANNING COMMISSION
FROM: PHIL AND MARY MYERS
DATE: May 13, 1998
RE: HWY 395 & HWY 182 ZONING

We are writing this memo to remind the Planning Commission of what transpired at a previous meeting we attended. At this meeting many people from the general public attended. It was a consensus of the general public that their opinion was the 395 corridor as well as the 182 corridor should be zoned for commercial use since they are both highways conducive for that particular type of zoning.

We hope the Planning Commission does not ignore the opinions of the people from the last meeting and change what the people wanted and agreed to.

(see following letter for specific requests)

Nov. 1, 1999

To Whom It May Concern:

Mono County Planning Dept. Zoning Book Page 26:

nine acres parcel # 11-030-07

We requested that this parcel be mix use because it is on highway 395. Please review and grant our request.

This parcel is located south of Bridgeport on Hwy. 395 south of the Chalet Motel and the Infant of Prague Church. During hearings on the proposed rezoning, the Planning Commission considered the owners' request to designate this property Mixed Use. At that time, the Planning Commission rejected the request, stating that the request was an effort to extend strip commercial development and the parcels was too far outside of the core commercial area in Bridgeport. In support of this decision, they cited the following General Plan land use policies:

OBJECTIVE A

Accommodate future growth in a manner that preserves and protects the area's scenic, agricultural, natural, cultural and recreational resources and that is consistent with the capacities of public facilities and services.

Policy 1: *Contain growth in and adjacent to existing community areas.*

Action 1.1: *Encourage infill development in existing communities and subdivisions. New residential subdivision should occur within or immediately adjacent to existing community areas. New residential development outside existing community areas and subdivisions should be limited to an overall density of one unit per 40 acres, plus a secondary unit developed in conformance with the Mono County Zoning & Development Code (MCZDC).*

Policy 4: *Avoid the juxtaposition of incompatible land uses.*

OBJECTIVE D

Provide for commercial development to serve both residents and visitors.

Policy 1: *Concentrate commercial development within existing communities.*

Policy 2: *Commercial uses should be developed in a compact manner; commercial core areas should be established/retained in each community area, and revitalized where applicable.*

Action 2.1: *Orient new commercial development in a manner that promotes pedestrian use. Avoid strip commercial development.*

The issue may be revisited during hearings on the Final Environmental Impact Report (FEIR) for the rezoning.

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Also, parcel # 11-291-02 Evans Tract on Hwy. 395
08-213-09 storage
08-213-14 apt. & house
08-213-11 empty lot

We requested they also be zoned commercial or mixed use. Please review and grant our request before this comes before the Board of Supervisors.

Phil and Mary Myers

The proposed land use designation for Parcel # 11-291-02 was changed by the Planning Commission to Mixed Use (MU).

The proposed land use designation for Parcel # 08-213-09, located along Hwy. 182 just north of its junction with Hwy. 395, was changed by the Planning Commission to Mixed Use (MU) in consideration of the existing use onsite.

Parcels # 08-213-11 and 08-213-14 are located along Aurora Canyon Road, behind Parcel # 08-213-09. The Planning Commission rejected the owners' request to designate those parcels Mixed Use, stating that to do would cause the intrusion of commercial development into a residential area. The proposed land use designation for Parcels # 08-213-11 and 08-213-14 is Single Family Residential (SFR).

The issue may be revisited during hearings on the Final Environmental Impact Report (FEIR) for the rezoning.

Ulrich Schmid-Maybach
October 30, 1999

Keith Hartstrom
County Planner
Mono County Planning
PO Box 8
Bridgeport, CA 93517

Dear Keith,

Thank you for taking the time to discuss my concerns regarding the Mono County General plan update yesterday. I would like to summarize my concerns as follows:

I am a land owner in the Big Hot area south of town. I am concerned about the status of two small parcels fronting highway 395 just south of the Chalet Motel. These parcels are currently zoned estate residential. It is of my utmost concern that these two parcels do not become rezoned as commercial, mixed use, or any designation that would increase their build out density. Allowing anything other than estate residential or lesser zoning would contradict the spirit and meaning of the current general plan: Higher impact here would constitute nothing less than sprawl in its simplest and most obvious sense. Its not as if there aren't plenty of in-fill opportunities in the town of Bridgeport proper.

The Planning Commission, during hearings on the proposed rezoning for the Bridgeport Valley, rejected requests to change the land use designation/zoning for parcels south of the existing Chalet Motel and Infant of Prague Church, stating that the request was an effort to extend strip commercial development and the parcels were too far outside of the core commercial area in Bridgeport. The issue may be revisited during hearings on the Final Environmental Impact Report (FEIR) for the rezoning.

More than in any other place in the valley, there is a clear "end" of town at the chalet motel and Infant of Prague Catholic Church. By expanding the mixed use zoning past this border a basic tenet of good town planning would be defeated. I urge you with the strongest language to work towards retaining Bridgeport's unique character by not allowing southern expansion "sprawl" to occur.

I purchased land in the Bridgeport area for its scenic character and unique recreational opportunities. I will not stand by and watch these things be compromised.

Your comments will be considered during the decisionmaking process on the rezoning.

While reviewing the general plan it also struck me that the RV park suggested for the Bodie road area was perhaps overly ambitious. Two thoughts come to mind, first that both Willow Springs and the Settlement are currently underutilized. Second, Bridgeport is a pretty quiet place in the shoulder seasons and winter time. Does it truly make economic sense to create a "destination" type facility that has limited seasonal access? My suggestion would be to focus on developing the town of Bridgeport to attract tourist dollars, and to a lesser extent the already developed areas of Willow Springs and the Settlement.

The proposed Bodie Hills RV Park is a separate project; the Specific Plan and EIR for that project will be considered separately by the Planning Commission and Board of Supervisors. Your concerns about the viability of the project are addressed in the FEIR for that project.

LU Amendment EIR

Thank you for the opportunity to present my viewpoint. Please keep me informed of any developments in the Bridgeport area, particularly as they relate to the areas herein mentioned.

Sincerely,
Ulrich Schmid-Maybach
853 Vallejo Street
Third Floor
San Francisco, CA 94133
(415) 434-0388 Fax (949) 625-7896

1468 Grizzly Peak
Berkeley, California 94708

October 26, 1999

Mono County Planning Department
Box 8
Bridgeport, California 93517

My understanding is that there is a draft "Mono County General Plan Land Use Amendments" which deals with, among other issues, inholdings in the Bodie Hills. It proposes that many areas now classified as Resource Management be reclassified for other uses, such as Estate Residential or Rural Resort.

Private lands in the Bodie Hills, which were designated Resource Management (RM) in the 1993 General Plan, are now proposed for designation as Agriculture (AG) with a Transfer of Development Credits Program which would limit the number of dwelling units which could be built on each parcel. One 155-acre parcel just east of the junction of Hwy. 395 and Hwy. 270 (the Bodie Road) is proposed for designation as Rural Resort (RU); the proposed Bodie Hills RV Park would be located on a portion of that parcel. There are no parcels proposed for designation as Estate Residential in the Bodie Hills; the inclusion of the ER designation in the DEIR for parcels in the Bodie Hills was an error from an earlier draft.

Perhaps Mono County's greatest resource is its wild, magnificent scenery. Certainly this is what attracts my family to the area and we have visited many times. Perhaps the wildest area is around Bodie. Not only is the scenery great, but numerous wild animals make it their home.

Given the sensitivity of the area I urge your department to prepare an EIS before changing the status quo. Most of the Bodie Hills are public lands and generally administered for conservation. Planning for private development should take the public use into account. A single misplaced dwelling may spoil an entire viewscape as well, possibly, impinging on key wildlife areas. Gradual sprawl would spoil too many things.

An Environmental Impact Report (EIR) has been prepared for the 1999 General Plan Land Use Amendments, in compliance with the requirements of the California Environmental Quality Act (CEQA). The Draft EIR was circulated for public comment; the Final EIR will be considered by the Planning Commission and Board of Supervisors in public hearings.

The Bodie Bowl Area of Critical Environmental Concern and Bodie Hills Planning Area: A Recommended Cooperative Management Plan (Draft, 1994) was prepared by the Bodie Area Planning Advisory Committee (BAPAC), an appointed public advisory committee. The BAPAC was commissioned by the Mono County Board of Supervisors, in consultation with the BLM, to develop land use policy recommendations for the 7,300 acre Bodie Bowl Area of Critical Environmental Concern (ACEC) and the larger Bodie Hills Planning Area (approximately 128,500 acres--17,000 acres of private lands, 500 acres of State lands, 104,000 acres of public lands managed by the BLM, and 7,000 acres of public lands managed by the Toiyabe National Forest). The BAPAC was composed of individuals representing a wide variety of interests, including local landowners, mining interests, environmentalists, historic preservationists, tourism, etc.. The Committee, through numerous public meetings, developed the Draft Plan. Policies pertaining to the Bodie Hills have since been incorporated into the 1999 Draft Mono County General Plan Land Use Element Amendments.

Sincerely: George Strauss

LU Amendment EIR

October 21, 1999

Mr. Keith Hartstrom
Mono County Planning Dept.
Box 8
Bridgeport, CA 93517

Dear Mr. Hartstrom:

I just learned about the proposal to rezone a portion of the Bodie Hills to Estate Residential, Rural Resort and Agricultural. This is a terrible idea! I urge you to retain the existing Resource Management designation for these lands. At a minimum you should prepare an EIS examining the impact the change would have on the nearby public lands.

Private lands in the Bodie Hills, which were designated Resource Management (RM) in the 1993 General Plan, are now proposed for designation as Agriculture (AG) with a Transfer of Development Credits Program which would limit the number of dwelling units which could be built on each parcel. One 155-acre parcel just east of the junction of Hwy. 395 and Hwy. 270 (the Bodie Road) is proposed for designation as Rural Resort (RU); the proposed Bodie Hills RV Park would be located on a portion of that parcel. There are no parcels proposed for designation as Estate Residential in the Bodie Hills; the inclusion of the ER designation in the DEIR for parcels in the Bodie Hills was an error from an earlier draft..

An Environmental Impact Report (EIR) has been prepared for the 1999 General Plan Land Use Amendments, in compliance with the requirements of the California Environmental Quality Act (CEQA). The Draft EIR was circulated for public comment; the Final EIR will be considered by the Planning Commission and Board of Supervisors in public hearings.

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If you want to see how bad it can get, and how easily the wildlands can vanish come on over to this side of the Sierra and take a drive through Tracy or even Grass Valley. You think that you are just approving some minor changes that will result in a few folks building innocuous houses in the area, but before you realize what happened you have a fully populated and trampled area. You have a chance to preserve some spectacularly beautiful and wildlife-rich lands over there---don't blow it on unnecessary development.

You don't want to drive by those places in a few years and have to explain to your kids, "there used to be wildlife here, but now it's just houses and gas stations and people."

Thanks for your consideration.

Francis Toldi
701 Walnut Avenue

Sincerely

Burlingame, CA 94010

LU Amendment EIR

10/29/99

To: Scott Burns, Mono County Planning Director
Keith Hartstrom
Fr: Steve Toomey
Re: Tri-Valley General Plan Update

I believe there is a conflict in the General Plan update for the Tri-Valley Area as the actions prescribed do not support the goals, objectives and policy statements.

More specifically:

- 1) Issues, opportunities and constraints of item #3 acknowledges retaining the current residential character of the area which allows keeping animals as well as the pressure from Bishop for residential development.
- 2) The Tri-Valley goal is to preserve the rural and agricultural character in the area.
- 3) Objective "B" is to integrate additional residential development into the existing community character in Chalfant,
- 4) Policy 2 is to preserve the rural character and setting of Chalfant.

These are existing land use policies for the Tri-Valley and Chalfant. They are not being amended at this time.

However, Action 2.1 calls for clustering of dwellings on parcels of 10 or more acres and Action 4.1 calls for development to take place on parcels contiguous to existing development.

Action 2.1 encourages, but does not require, clustering on parcels of 10 acres or greater. Action 4.1, which encourages, but does not require, development to take place on parcels contiguous to existing development, is intended to promote the orderly infill of Chalfant in order to provide efficient delivery of public services such as fire protection.

The rural character of Chalfant is expressed by properties with barns, corrals, animals and fences around the property perimeter which can not be maintained with any urban concept of clustering. We have miles of open space around Chalfant negating any need for clustering.

See previous response concerning clustering.

The older east side of Chalfant is not capable of supporting pressure for development from Bishop and is not contiguous to any other areas in the valley. The west side, northern access, White Mountain Estates and land trades to the south are not contiguous to Chalfant.

See previous response concerning development on contiguous properties. Action 4.1 is intended to promote infill development on existing private lands within the developed Chalfant community areas. It is not suggesting that additional lands should be acquired to make the various parts of Chalfant contiguous or that development of existing private lands that are not contiguous to other private parcels in the Chalfant area is in any way limited by those lands not being contiguous to other private lands.

Moreover, these lands are unlikely to ever become contiguous. Acquiring the DWP and BLM property which separates Old Chalfant from other private holdings, is not a reasonable condition for development of the private property in the area.

See previous response.

Sincerely,

Steve Toomey

**WOFFORD'S
MOBILE HOME SERVICE
Commercial Buildings & Laundromat**

Mono County Planning Department
P.O. Box 347
Mammoth Lake, CA 93546

October 20, 1999

Mr. Scott Burns
Mr. Keith Hartstrom

Re: Mono County General Plan Update on APN 26-090-32

I have attended all meetings regarding this planning effort and upon reviewing the draft document I do not feel my land APN 26-090-32 is dealt with as agreed with the local Regional Planning Advisory Committee, or the Mono County Planning Commission. Specifically, the Plan should reflect RMH 2.35 acre zoning at my property. Please advise me if you concur with this opinion.

Sincerely,

Donald E. Wofford
P.O. Box 575
Bishop, CA 93515

(619) 873-6072

The subject parcel is shown on Figure 96 in the Land Use Maps. A small area in the Chalfant Valley was designated Rural Mobilehome with a 4-acre minimum lot size (RMH 4); the subject parcel is located in that area. This designation may be considered further by the Planning Commission and Board of Supervisors during the decisionmaking process on the rezoning.

Insert Lahontan letter of July 10,2000

3

5

FEIR ADDITIONAL RESPONSE TO COMMENTS

This additional response to comments to the Mono County General Plan Land Use Amendments FEIR has been prepared to address concerns raised in a second comment letter from the Lahontan Regional Water Quality Control Board (LRWQCB) (LRWQCB letter dated July 10, 2000; see previous six pages). On August 17, 2000, County staff met with LRWQCB staff to discuss concerns raised in that letter. As a result of that meeting, this additional response to comments has been prepared.

In their letter of July 10, 2000, the LRWQCB presented specific concerns regarding water quality issues, in addition to an overall concern about the relationship of the water quality policies and regulations in the Mono County General Plan to other policies and regulations governing water quality. Additional development requirements pertaining to water quality exist throughout the General Plan (Land Use Element, Conservation/Open Space Element), in the County Code (Land Use Regulations, Grading Ordinance, Subdivision Ordinance), in State policies and regulations (LRWQCB, California Department of Fish and Game), and in Federal policies and regulations (Clean Water Act, US Army Corps of Engineers, US Fish and Wildlife). To ensure that readers of the Land Use Element are aware of these additional requirements, the following statement is proposed for inclusion in the Land Use Element (p. II-26, "Introduction" section of the Land Use Policies):

"NOTE: Land use policies in this Element should be reviewed in conjunction with the following policies and regulations: policies in other General Plan Elements (i.e.: Housing, Conservation/Open Space, Noise, Safety, Circulation, and Hazardous Waste Management); applicable sections of the Mono County Code (e.g. Land Use Regulations, Noise Ordinance, Grading Ordinance, Subdivision Ordinance); applicable State policies and regulations (e.g. Lahontan Regional Water Quality Control Board Basin Plan, Great Basin Unified Air Pollution Control District Air Quality Plan, Caltrans planning documents, etc.); and applicable Federal policies and regulations (e.g. Clean Water Act, TEA 21, US Forest Service planning documents, Bureau of Land Management planning documents, etc.).

It should also be noted that County "... development policies and standards shall be viewed as minimum requirements; development should strive to exceed those minimums whenever reasonably feasible. County staff may require project modifications as necessary to implement this policy" (Mono County Land Use Element, Policy 10).

Specific concerns raised in the LRWQCB's July 10, 2000 letter focus on the planning areas where potential buildout would increase under the proposed General Plan Amendments and where there are "impaired water bodies"¹, i.e. the Antelope Valley, the Bridgeport Valley, the Bodie Hills, and Mono North. Potential buildout would also increase in the Chalfant Valley but there are no impaired water bodies in that area currently; as a result, the comment letter does not address Chalfant Valley. The LRWQCB's concerns are twofold:

1. That increased potential buildout in the four planning areas listed above may result in cumulatively significant impacts to impaired water bodies in those planning areas; and

¹ Impaired water bodies do not meet water quality standards and are not expected to meet water quality standards after the implementation of technology-based controls (LRWQCB letter, July 10, 2000)

LU Amendment EIR

2. That increased potential buildout in the four planning areas may result in cumulative impacts to (or losses of) wetlands in those planning areas.

The comment letter from the LRWQCB states that either a detailed cumulative impacts analysis is required in the FEIR to address these issues or “mandatory mitigation measures to avoid or reduce to insignificance the potential for such cumulative impacts” should be added to the General Plan.

The comment letter identifies “impaired” water bodies in each of the planning areas and the “stressor(s)” or factors which contribute to the water body being listed as impaired:

Antelope Valley

West Walker River (stressor: sediment)

Topaz Lake (stressor: sediment)

Bridgeport Valley

Bridgeport Reservoir (stressors: sediment, nutrients)

East Walker River (stressors: metals, sediment)

Green Creek (stressor: habitat alteration)

Bodie Hills

Bodie Creek (stressor: metals)

Rough Creek (stressor: habitat alteration)

Aurora Canyon Creek (stressor: habitat alteration)

Clearwater Creek (stressor: sediment)

Clark Canyon Creek (stressor: habitat alteration)

Hots Springs Canyon Creek (stressor: sediment)

Mono Basin North

Mono Lake (stressors: salinity, chloride, TDS)

Lee Vining Creek (stressor: flow alteration)

This document discusses potential buildout in each of the planning areas identified above, the potential impact of that buildout on identified “stressors” and “impaired” water bodies, and countywide standards which avoid or mitigate potential impacts to “impaired” water bodies and wetlands.

ANTELOPE VALLEY & BRIDGEPORT VALLEY PLANNING AREAS

Potential buildout in the Antelope Valley Planning Area appears to increase by 699 dwelling units, due primarily to the designation of a 10 acre minimum parcel size on agricultural lands. Similarly, in the Bridgeport Valley Planning Area, potential buildout appears to increase by 265 dwelling units due to the use of a development credits program to calculate potential buildout on most of the agricultural lands in the planning area.

The apparent increases in potential buildout on agricultural lands in the Antelope Valley and the Bridgeport Valley are misleading since potential buildout on those agricultural lands was calculated using different sets of assumptions for the 1993 General Plan and the proposed 1999 General Plan Land Use Amendments.

As noted in the FEIR for the 1999 General Plan Land Use Amendments (p. 22), buildout for the agricultural lands in both Antelope Valley and Bridgeport Valley was calculated at 1 dwelling unit/40 acres in the 1993 General Plan, although the Agriculture (AG) designation allows 1

unit/2.5 acres. It was assumed that development at 1 unit/2.5 acres was unlikely to occur due to environmental constraints (e.g. wetlands, impacts to water bodies) and community interest in maintaining the agricultural lands in the valleys as open space. This “real world” development scenario resulted in a substantially lower potential buildout figure than that actually allowed by the designation.

The proposed 1999 General Plan Land Use Amendments utilized the opposite approach to calculate potential buildout on the agricultural lands in Antelope Valley and Bridgeport Valley. It was assumed that development would occur to the full buildout level allowed by the designation, a “worst-case” development scenario. Development in those areas is still unlikely to occur to the full buildout level allowed by the designation due to environmental constraints and interest in maintaining the lands as open space.

As shown by Table A-1, if a “worst-case” full buildout scenario is utilized to calculate potential buildout on AG lands in Antelope Valley and Bridgeport Valley for both the existing designation and the proposed designation, potential buildout is actually reduced substantially by the proposed 1999 General Plan Land Use Amendments, despite the fact that there is more acreage designated as AG in 1999 in both the Antelope Valley and Bridgeport Valley planning areas. Since there will be no increased potential buildout in those areas, there will be no cumulative impacts related to wetlands or “impaired” water bodies.

The “impaired” water bodies in the Antelope Valley are the West Walker River and Topaz Lake; the “stressor” identified for both of them is sediment. Since the 1999 General Plan Amendments actually reduces potential buildout significantly from that allowed by the 1993 General Plan, substantially less land will be disturbed, substantially reducing the creation of sediment and potential related impacts. Countywide standards contained in the General Plan and county ordinances address potential impacts to wetlands and potential impacts, such as sedimentation, which could affect “impaired water bodies” (see the following section labeled “Countywide Standards”).

TABLE A-1 1993 Buildout on AG Lands vs. 1999 Buildout on AG Lands, Antelope Valley and Bridgeport Valley Planning Areas

	AG acres in 1993	AG acres in 1999	1993 GP Potential Buildout	1999 GP Potential Buildout
Antelope Valley	13,264	14,894	5,305 du	1,489 du
Bridgeport Valley	23,065	24,783	9,226 du	690 du
Totals	---	---	14,531 du	2,179 du

Notes: du = dwelling unit. 1993 General Plan potential buildout figures are calculated at 1 dwelling unit/2.5 acres as allowed by the AG designation. 1999 General Plan potential buildout figures are those shown in the proposed General Plan Land Use Amendments; Antelope Valley was calculated at 1 du/10 acres, Bridgeport Valley was calculated using the Development Credits Program which results in approximately 1 du/40 acres.

The “impaired” water bodies in the Bridgeport Valley are the Bridgeport Reservoir (sediment, nutrients), the East Walker River (metals, sediment), and Green Creek (habitat alteration). It should be noted that there is little private land along Green Creek and the East Walker River. Land along the East Walker River has been bought by the California Department of Fish and Game and is now designated open space (except for a 50-100 acre parcel at the Nevada border).

LU Amendment EIR

As explained above, potential buildout on the agricultural lands in the Bridgeport Valley will actually decline with the proposed 1999 General Plan. In addition, buildout on the agricultural lands in the Bridgeport Valley was calculated using the Development Credits Program.

The Transfer of Development Credits Program assigns a certain number of development credits to each parcel based on an established formula; this supercedes the density of 1 dwelling unit per 2.5 acres and a secondary unit allowed by the General Plan on AG parcels. The formula for assigning Development Credits is included in the Bodie Hills land use policies under Objective I and the Tri-Valley policies under Objective A (see 1999 Draft Revised Land Use Element).

Each development credit (DC) permits the construction of one single family residence. Development credits may be transferred to parcels as small as one acre in size. Development credit parcels should be clustered as follows:

- adjacent to existing residential development if feasible.
- with a buffer established in consultation with adjacent agricultural landowners.
- to avoid steep slopes and fault hazard areas.
- to avoid wetlands and areas subject to flooding.
- away from visually sensitive areas, such as ridgelines or along scenic highways.
- to minimize impacts to wildlife, including migrating deer.
- to minimize impacts to cultural resource sites.
- proximate to existing access and utilities if feasible.
- on soils of sufficient structural and sanitary waste disposal capabilities.

Implementation of the standards listed above will avoid or minimize impacts to wetlands and potential impacts, such as sedimentation and nutrient loading, which could affect "impaired water bodies". The requirement to cluster development would result in less disturbance (e.g. roads, utilities) than that which would be required under the existing General Plan designation and, therefore, fewer potential impacts to water bodies. Countywide standards contained in the General Plan and county ordinances address potential impacts to wetlands and potential impacts, such as sedimentation, which could affect "impaired water bodies" (see the following section labeled "Countywide Standards").

BODIE HILLS PLANNING AREA

The proposed increased buildout in the Bodie Hills Planning Area (+ 40 units) is a result primarily of utilizing the Development Credits Program to calculate buildout. As discussed above, the Development Credits Program clusters development and contains standards which will avoid or minimize impacts to wetlands and potential impacts which could affect "impaired water bodies". The requirement to cluster development would result in less disturbance (e.g. roads, utilities) than that which would be required under the existing Resource Management designation and, therefore, fewer potential impacts to water bodies. This is important in the Bodie Hills because private lands there are widely dispersed and, in most cases, not located on existing developed roads.

Countywide standards contained in the General Plan and county ordinances also address potential impacts to wetlands and potential impacts which could affect "impaired water bodies" (see the following section labeled "Countywide Standards").

MONO NORTH PLANNING AREA

The increase in potential buildout in the Mono North Planning Area (+ 8 units) is due to the redesignation of property from Resource Management (RM) to Estate Residential (ER) and Rural Residential (RR). The ER has 10 acre and 40 acre minimum lot sizes; the RR has a 20 acre

minimum lot size. The parcels affected by this redesignation are located along Cottonwood Canyon Road and Poleline Road, north of Mono Lake.

The “impaired” water bodies listed by the LRWQCB for the Mono North Planning Area are:

Mono Lake (stressors: salinity, chloride, TDS); and
Lee Vining Creek (stressor: flow alteration).

Lee Vining Creek is not in the Mono North Planning Area; it is in the Mono South Planning Area. Mono Lake is over a mile south of the parcels affected by this redesignation, sufficiently distant so that potential impacts from the 8 additional units will be less than significant. In addition, two of the stressors for Mono Lake, salinity and chloride, are naturally occurring conditions and are not likely to be exacerbated by single family residential development.

COUNTYWIDE STANDARDS

In addition to policies and development standards specific to each Planning Area in the County, Mono County ordinances and General Plan policies contain a number of standards intended to mitigate potential impacts to wetlands and to “impaired water bodies” throughout the county. In addition, existing State and Federal policies and regulations address potential water quality impacts throughout the county, particularly to wetlands. Pertinent policies and regulations are summarized below.

As noted above, County policies and regulations pertaining to water quality should be reviewed in conjunction with applicable State and Federal policies and regulations which address water quality. It should also be noted that County “ ... development policies and standards shall be viewed as minimum requirements; development should strive to exceed those minimums whenever reasonably feasible. County staff may require project modifications as necessary to implement this policy” (Mono County Land Use Element, Policy 10).

Wetlands

Mono County Reclamation Ordinance

(Chapter 19.60, Mono County Zoning & Development Code)

“Wetland habitat shall be avoided. Any wetland impacted as a consequence of resource development activities shall be mitigated at a minimum of a one-to-one ratio for wetland habitat acreage and wetland habitat value.” (19.60.050 F 1 c)

- **Bridgeport Wetlands Policies**

(Mono County General Plan, Land Use Element)

Note: The policies quoted here, along with other implementing policies, were adopted by Mono County in concert with the U.S. Army Corps of Engineers as part of a Wetlands Special Area Management Plan for the Bridgeport Valley.

Goal: To preserve and enhance wetland functions and values, including wildlife and plant habitat, beneficial livestock forage value, water quality benefits, and aesthetic and recreational values, while providing for orderly growth and an efficient, coordinated permitting process.

Objective A: Guide development in the Bridgeport Valley so that no net loss of wetlands functions and values or acreage results from development activities.

Objective B: Maintain and enhance wetland habitat values and functions with willing landowners in the Bridgeport Valley.

- **National Wetlands Policies**

The U.S. Army Corps of Engineers regulates the placement of fill in waters of the United States, including wetlands. The U.S. Army Corps is one of four federal agencies involved in regulating wetlands. As noted above, the U.S. Army Corps, in concert with Mono County, adopted a Wetlands Special Area Management Plan for the Bridgeport Valley.

- **Regional Wetlands Policies**

The Lahontan Regional Water Quality Control Board's (LRWQCB) Basin Plan contains water quality objectives and standards which address wetlands and "impaired" water bodies. As required by Section 303 (d) of the Federal Clean Water Act, the LRWQCB is in the process of developing plans [i.e. Total Maximum Daily Loads (TMDLs)] which will " ... specify the actions needed to lessen the cumulative problems to the point that Basin Plan water quality standards are achieved" (p. 3, LRWQCB comment letter, see Attachment A). When those TMDLs are in place, Mono County will comply with them.

Sedimentation

- **Mono County Reclamation Ordinance**

(Chapter 19.60, Mono County Zoning & Development Code)

4. Drainage, Diversion Structures, Waterways, and Erosion Control.
 - a. Reclamation activities shall be conducted to protect on-site and downstream beneficial uses of water in accordance with the Porter-Cologne Water Quality Control Act, Water Code Section 13000 et. seq., and the Federal Clean Water Act, 33 U.S.C. Section 1251 et. seq.
 - b. The quality of water, recharge potential, and storage capacity of groundwater aquifers shall not be diminished, except as allowed in the approved reclamation plan.
 - c. Erosion and sedimentation shall be controlled during all phases of construction, operation, reclamation, and closure of an operation to minimize siltation of lakes and watercourses, as required by the Regional Water Quality Control Board, the State Water Resources Control Board, and the Mono County Grading Ordinance.
 - d. Surface runoff and drainage shall be controlled by berms, silt fences, sediment ponds, revegetation, hay bales, or other erosion control measures, to ensure that surrounding land and water resources are protected from erosion, gullyng, sedimentation, and contamination. Erosion control methods shall be designed to handle runoff from not less than the 20 year/1 hour intensity storm event.
 - e. Where natural drainages are covered, restricted, rerouted or otherwise impacted, mitigating alternatives shall be proposed and specifically approved in the reclamation plan to assure that runoff shall not cause increased erosion or sedimentation.
 - f. When stream diversions are required, they shall be constructed in accordance with:
 1. applicable stream and lake alteration agreements between the operator and the Department of Fish and Game; and
 2. the requirements of the Federal Clean Water Act, Sections 301 (33 U.S.C. Section 1311) and 404 (33 U.S.C. Section 1344) and/or section 10 of the Rivers and Harbors Act.

- g. When no longer needed to achieve the purpose for which they were authorized, all temporary stream channel diversions shall be removed and the affected land reclaimed. (19.60.050 F 4)

-

- **Mono County Grading Ordinance**

(Chapter 13.08, Mono County Code)

No person shall excavate, grade, or place fill material on or within any property so that soil or debris washed, eroded or moved from the property by natural or artificial means creates a public nuisance or hazard on other property, public road, street or utility easement (13.08.040 B)

No person shall obstruct, divert or interfere with natural or artificial surface drainage, swales, ditches, gutters or other improved or unimproved drainage channels or drainage ways except for construction or operations approved by the [public works] department or concerned special district. (13.08.040 C)

Grading in, on, under over or adjacent to old fills, swamp, marsh lands or in areas known or believed to be potential slide areas shall not be permitted until a report by a soils engineer has been submitted to and reviewed by the [public works] director. If the area has expansive soils, a report shall be submitted by the soils engineer for director review. The reports shall certify that the proposed construction will be stable within itself and will not be hazardous to any adjoining property or to any public road, utility or other facility. Any recommendations presented in the report regarding material, equipment or procedures to be incorporated in the construction or operation to insure adequate stability and safety may be included as a condition in the grading permit. (13.08.060)

Drainage facilities, erosion and pollution control devices shall be provided to convey surface waters to a natural channel or watercourse or to a storm drainage facility without causing erosion, damage or pollution. This may also include off-site facilities. (13.08.360)

Slope surfaces of excavation and embankment shall be protected from erosion by revegetation and/or other means that will reduce the runoff velocities. (13.08.390)

- **Water Quality Requirements**

(Mono County General Plan, Conservation/Open Space Element, Water Resources Policies, Goal II, Objective A and B)

OBJECTIVE A Preserve, maintain, and enhance surface and groundwater resources to protect Mono County's water quality and water dependent resources from the adverse effects of development or degradation of water dependent resources.

Policy 1: Future development projects shall avoid potential significant impacts to water quality in Mono County, or mitigate impacts to a level of non-significance unless a statement of overriding considerations is made through the EIR process.

Action 1.1: Future development projects with the potential to significantly impact water quality shall assess the potential impact(s) prior to project approval. Examples of potential significant impacts include:

- 1) substantially degrading water quality; and/or
- 2) contaminating a public water supply; and/or
- 3) causing substantial flooding, erosion or siltation.

In areas determined by the County to be of special significance, such an analysis and associated mitigation measures may be required even if the proposed project conforms to water quality standards established by the Lahontan Regional Water Quality Control Board for the project area.

The analysis shall:

- a) be funded by the applicant;
- b) be prepared by a qualified person under the direction of Mono County;
- c) assess current water quality in the general project vicinity;
- d) describe the impacts of the proposed development upon water quality within the project site and on surrounding areas, including a quantification of potential runoff and sedimentation from erosion, contamination that could enter the surface or groundwater system, calculations or mapping related to flooding, and potential cumulative onsite and offsite hydrologic effects on water quality;
- e) for projects with the potential to significantly affect groundwater resources, the analysis may be required to include hydrologic mapping, studies of water flows, groundwater resources, aquifer properties, and baseline quality data; and
- f) recommend project alternatives or measures to avoid or mitigate impacts to water quality, including a plan for long-term monitoring of water quality.

Mitigation measures and associated monitoring programs shall be included in the project plans and specifications and shall be made a condition of approval for the project.

Policy 2: Control erosion at construction projects.

Action 2.1: Ensure that Lahontan Regional Water Quality Control Board (RWQCB) regulations for erosion control are met as a condition for County permit approvals.

Action 2.2: Work with the RWQCB to develop standards and regulations for specific areas of the unincorporated area. Reflect these standards in applicable county regulations, such as the Grading Ordinance (Chapter 13.08).

Action 2.3: Work with Lahontan RWQCB to enforce erosion control standards for development on private land.

Action 2.4: Require posting of a performance bond in compliance with the County Grading Ordinance.

Action 2.5: Work with Lahontan RWQCB in the development and revision of erosion control standards.

Policy 3: Adjust current practices which cause excessive erosion in order to avoid or mitigate such erosion.

Action 3.1: County staff and contractors shall follow County grading standards when maintaining County roads, rights-of-way, and property.

Action 3.2: Request that state and federal agencies enforce requirements to minimize erosion.

Action 3.3: Promote the use of cattle fences and fish screens in range areas next to streams and lakes where scientific data and management policies indicate the practice to be beneficial to wildlife and livestock.

Action 3.4: Consider amending the County Grading Ordinance to address water quality concerns.

Policy 4: Establish buffer zones where recharge occurs, including adjacent to surface waters and riparian areas.

Action 4.1: Amend the Zoning Code to specify uses and setback requirements from recharge, riparian, and wetland areas. Continue to enforce setback requirements from surface waters.

Action 4.2: Establish policies for the management of wetlands in Mono County.

Action 4.3 Develop Special Area Management Plans² in cooperation with the U.S. Army Corp of Engineers for the Bridgeport and Long Valleys, as well as other wetland regions of the County.

Policy 5: Control the release of storm water so that runoff from sites in recharge zones does not increase in volume or leave the site more rapidly than it would under natural conditions.

Action 5.1: Update the County Grading Ordinance to specify that as part of the grading permit process, developers may be required to provide hydrologic studies assessing pre-development runoff and calculating project runoff.

Policy 6: Drill holes, such as those that are used for mining, geothermal development, and water development, shall be abandoned and plugged in conformance with state requirements for the protection of groundwater resources and public health and safety.

OBJECTIVE B Protect water from chemical or bacterial contamination.

Policy 1: Sewage treatment facilities shall be adequate to protect beneficial uses of surface and groundwater.

Action 1.1: Cooperate with Lahontan RWQCB to monitor water quality.

²A Special Area Management Plan is a set of policies developed cooperatively with the U.S. Corps of Engineers to address local wetland development issues.

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- Action 1.2: Encourage federal, state, and local agencies to maintain adequate sanitary treatment capacity at their facilities.
- Policy 2: Degradation of water quality from livestock shall be minimized.
- Action 2.1: As necessary, investigate the use of fencing, alternate grazing patterns, and/or reduction in the number of animals grazed, or other measures to protect stream water quality.
- Action 2.2: Recommend that salt blocks, supplemental food supplies, or chemicals used in treating animals be located sufficiently far from surface water and used in such a manner as to protect water quality.
- Policy 3: Chemicals used for road maintenance should be applied in a manner that does not cause degradation of water quality.
- Action 3.1: County staff and contractors shall not use environmentally damaging methods for de-icing roads.
- Action 3.2: Work cooperatively with other agencies such as Caltrans and the Town of Mammoth Lakes to achieve the most environmentally sound methods of de-icing roads.
- Action 3.3: Request further study of proposed de-icing methods before their widespread use.
- Action 3.4 Enforce Lahontan's standards for road maintenance and weed control; work with other agencies to do the same.
- Policy 4: Use of fertilizer, pesticide, and other chemicals on vegetation or soil in recharge zones should be minimized.
- Action 4.1: Work with the County Agricultural Commissioner and the Soil Conservation Service to institute controls to protect water quality.
- Action 4.2: Work with the County Agricultural Commissioner and the Soil Conservation Service to promote effective and minimal use of chemicals in landscaping and agriculture.
- Policy 5: Assist in the management and control of toxic chemicals or other substances from extractive, industrial, manufacturing, household or commercial uses.
- Action 5.1: Assist appropriate agencies, such as Lahontan Regional Water Quality Control Board and EPA, in enforcing regulations pertaining to hazardous waste management.
- Action 5.2: Implement policies in the Hazardous Waste Management Element of the county's General Plan.

Habitat Alteration and Sedimentation

● **Stream Setback Requirements**

(Chapter 19.03, Mono County Zoning & Development Code)

7. Lakes, Streams, and Creeks. In order to minimize the impact to areas with lakes, streams, and creeks, the following procedures shall be applicable (specific plans or area general plans may be more restrictive or less restrictive and shall take precedence):
 - a. Definitions. A major stream is shown as a permanent stream on a U.S. Geological Survey (USGS) map and is a continuously flowing water body. A minor stream is shown as an intermittent stream on a USGS topographic map and is a permanent stream with low flow during all or part of the year. Seasonal streams not shown on a USGS map are not subject to this section, unless determined otherwise in accordance with subparagraph c of this subdivision. A lake is an accumulation of water, larger than a pool or pond, generally formed by a natural or manmade obstruction in the course of flowing water, that is shown on a USGS map.
 - b. New development shall be subject to the following minimum setbacks from any lakes, and major or minor stream. Any proposed structure, including associated impervious surfaces, shall be located a minimum of thirty feet from the top of the bank. Greater setback requirements may be imposed through the land division and/or environmental review process if determined to be necessary to protect the waterbody and riparian resource. Deviations of these setback requirements may be granted if the mandatory director review findings can be made and the applicant can demonstrate that the proposed construction will not result in significant adverse impact on the waterbody or the riparian area. Such director review applications shall include a landscaping plan which illustrates all project site disturbance areas and specifies a comprehensive program for restoring the disturbed areas.

Structures and uses existing within these setback areas prior to January 1, 1990, shall be permitted to remain and, if necessary, be reconstructed. Such reconstruction within the setback area shall not result in:

1. An increase in lot coverage;
 2. A change in use;
 3. Increased runoff from impervious surfaces; or
 4. An adverse change in the drainage of the lot.
- c. If the department of public works determines in the course of their review that a stream course not identified on a USGS map carries significant flow (either continuously or intermittently), the building setbacks in this subdivision may be imposed.
(19.03.130 D 7)

Collaborative Planning Efforts Related to Water Quality

- In addition to the existing countywide regulations, the County has drafted Best Management Practices (BMPs) for construction activities in the June Lake area in order to protect water quality in the June Lake Loop. The County will be working with the LRWQCB to implement those BMPs.

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- In compliance with General Plan policies, the County will continue to work with the Collaborative Planning Team and the LRWQCB to establish policies to manage wetlands in Mono County (see Conservation/Open Space Element, Water Resources & Water Quality Policies, Goal II, Objective A, Action 4.2).
- The County will be working through the Collaborative Planning Team's Wetlands Subcommittee to establish a land trust or wetlands mitigation bank in the Bridgeport Valley in compliance with General Plan policies (Land Use Element, Bridgeport Area Wetlands Policies, Objective A, Policy 2). Efforts will include pursuing monies through the Proposition 13 Clean Water Bond program and watershed planning grants.
- In compliance with General Plan policies, the County will be working with the LRWQCB to clarify requirements to ensure that there are no impacts to impaired water bodies (see Conservation/Open Space Element, Water Resources & Water Quality, Goal II, Objective A, Actions 2.1, 2.2, 2.3, 2.5).

VII. REFERENCES AND PERSONS CONSULTED

EIR PREPARERS

Mono County Planning Department Staff
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Keith Hartstrom, Senior Planner

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REFERENCES

EIP Associates. **Mono County Wetlands Study.** 1992.

Mono County Planning Department. **Bodie Hills RV Park Specific Plan/EIR.** Draft 1999.

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PERSONS CONSULTED

Mono County Environmental Health Department
Dennis Lampson, Environmental Health Specialist IV

**APPENDIX A--REVISED TABLE 3 FROM THE LAND USE ELEMENT
BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS**

Table 2 in the text of this document is a revision of the overall totals from the existing Table 3 in the Land Use Element of the 1993 General Plan. Revised sheets for each Planning Area are included in this Appendix A in the following order:

- Antelope Valley
- Swauger Creek
- Bridgeport Valley
- Bodie Hills
- Mono North (Mono City, Lundy, Cottonwood Canyon Road)
- Mono South (Lee Vining)
- June Lake
- Mammoth Vicinity
- Long Valley
- Wheeler Crest
- Chalfant Valley
- Hammil Valley
- Benton Valley
- Outside Planning Areas

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**TABLE 3
BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS**

Community Planning Area: ANTELOPE VALLEY

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre	585	454 ^a
RR Rural Residential	1 du/acre	1,511	398 ^b
RMH Rural Mobilehome	1 du/acre	65	65
SFR Single Family Residential	5.8 du/acre		
MFR-L Multiple Family Residential Low	11.6 du/acre		
MFR-M Multiple Family Residential Moderate	15 du/acre		
MFR-H Multiple Family Residential High	15 du/acre		
MU Mixed Use	15 du/acre	180	2,700
CL, M Commercial Lodging, Moderate	15 du/acre		
CL, H Commercial Lodging, High	15 du/acre		
RU Rural Resort	1 du/5 acres	11	---
C Commercial	15 du/acre	4	60
CS Service Commercial	---		
IP Industrial Park	---	20	---
I Industrial	---		
RE Resource Extraction	---		
PF Public/Quasi-Public Facilities	---	37	---
RM Resource Management	1 du/40 acres	540	13
OS Open Space	1 du/80 acres		
NHP Natural Habitat Protection	1 du/5 acres		
AG Agriculture	1 du/2.5 ac.	14,894	1,489 ^c
AP Area Plan	---		
SP Specific Plan	---	260	--- ^d
Total Private Lands		18,107	5,179
RM Resource Management--Federal/State	---	6,685	---
OS Open Space--WRID	1 du/80 acres	1,236	15
Other	---		
Total		26,028	5,194

Notes: du = dwelling unit

- 146 acres designated ER 10 (10 acre minimum lot size).
- 1,344 acres designated RR 5 (5 acre minimum lot size); 39 acres designated RR 40 (40 acre minimum lot size).
- AG 10 (10 acre minimum lot size) designated in Antelope Valley.
- This represents the future expansion area for Coleville. No development plan has been proposed.

**TABLE 3
BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS**

Community Planning Area: SWAUGER CREEK

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre	348	9a
RR Rural Residential	1 du/acre		
RMH Rural Mobilehome	1 du/acre		
SFR Single Family Residential	5.8 du/acre		
MFR-L Multiple Family Residential Low	11.6 du/acre		
MFR-M Multiple Family Residential Moderate	15 du/acre		
MFR-H Multiple Family Residential High	15 du/acre		
MU Mixed Use	15 du/acre		
CL, M Commercial Lodging, Moderate	15 du/acre		
CL, H Commercial Lodging, High	15 du/acre		
RU Rural Resort	1 du/5 acres		
C Commercial	15 du/acre		
CS Service Commercial	---		
IP Industrial Park	---		
I Industrial	---		
RE Resource Extraction	---		
PF Public/Quasi-Public Facilities	---		
RM Resource Management	1 du/40 acres		
OS Open Space	1 du/80 acres		
NHP Natural Habitat Protection	1 du/5 acres		
AG Agriculture	1 du/2.5 acres		
AP Area Plan	---		
SP Specific Plan	---		
Total Private Lands		348	9
RM Resource Management--Federal/State	---	1,600	---
Other	---		
Total		1,948	9

Notes:

du = dwelling unit

a. Designated ER 40 (40 acre minimum lot size).

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TABLE 3 BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS

Community Planning Area: BRIDGEPORT VALLEY

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre	296	296
RR Rural Residential	1 du/acre	30	30
RMH Rural Mobilehome	1 du/acre		
SFR Single Family Residential	5.8 du/acre	199	1,154
MFR-L Multiple Family Residential Low	11.6 du/acre	23	266
MFR-M Multiple Family Residential Moderate	15 du/acre	4	60
MFR-H Multiple Family Residential High	15 du/acre		
MU Mixed Use	15 du/acre	39	585
CL, M Commercial Lodging, Moderate	15 du/acre		
CL, H Commercial Lodging, High	15 du/acre		
RU Rural Resort	1 du/5 acres	124	---
C Commercial	15 du/acre	26	390
CS Service Commercial	---	2	---
IP Industrial Park	---	21	---
I Industrial	---		
RE Resource Extraction	---		
PF Public/Quasi-Public Facilities	---	183	---
RM Resource Management	1 du/40 acres	854	21
OS Open Space	1 du/80 acres		
NHP Natural Habitat Protection	1 du/5 acres		
AG Agriculture	1 du/2.5 ac.	24,823	691 ^a
AP Area Plan	---		
SP Specific Plan	---	167	--- ^b
Total Private Lands		26,791	3,493
RM Resource Management--Federal/State	---	17,936	---
OS Open Space--WRID	1 du/80 acres	3,066	38
Total		47,793	3,531

Notes: du = dwelling unit

- a. 66 acres designated AG 10 (10 acre min. parcel size). 115 acres designated AG 20 (20 acre min. parcel size). Dwelling unit potential for remaining 24,602 acres calculated using the development credits program established in Hammil Valley which allows a certain number of units to be developed per parcel, depending on the size of the parcel and the ownership. In Bridgeport Valley it results in 678 potential du for the 24,602 acres.
- b. Development of the remaining 167 acres in the Bridgeport Community are constrained by identified wetlands; special considerations are necessary for development. No development plan has been submitted for either of these areas.

**TABLE 3
BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS**

Community Planning Area: **BODIE HILLS**

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre		
RR Rural Residential	1 du/acre		
RMH Rural Mobilehome	1 du/acre		
SFR Single Family Residential	5.8 du/acre		
MFR-L Multiple Family Residential Low	11.6 du/acre		
MFR-M Multiple Family Residential Moderate	15 du/acre		
MFR-H Multiple Family Residential High	15 du/acre		
MU Mixed Use	15 du/acre		
CL, M Commercial Lodging, Moderate	15 du/acre		
CL, H Commercial Lodging, High	15 du/acre		
RU Rural Resort	1 du/5 acres	155 ^b	---
C Commercial	15 du/acre		
CS Service Commercial	---		
IP Industrial Park	---		
I Industrial	---		
RE Resource Extraction	---		
PF Public/Quasi-Public Facilities	---		
RM Resource Management	1 du/40 acres		
OS Open Space	1 du/80 acres		
NHP Natural Habitat Protection	1 du/5 acres		
AG Agriculture	1 du/2.5 ac.	14,251	402 ^a
AP Area Plan	---		
SP Specific Plan	---		---
Total Private Lands		14,406	402 ^c
RM Resource Management--Federal/State	---	114,994	---
Other	---		
Total		129,400	402

Notes: du = dwelling unit

- a. Dwelling units were calculated using the development credits program established in Hammil Valley which allows a certain number of units to be developed per parcel, depending on the size of the parcel and the ownership.
- b. The **Bodie RV Park Specific Plan**.
- c. This figure does not include any lands within the Bodie Area of Critical Environmental Concern (ACEC) established by the Bureau of Land Management.

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**TABLE 3
BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS**

**Community Planning Area: MONO BASIN NORTH
(MONO CITY, LUNDY, COTTONWOOD CANYON ROAD)**

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre	410	10 ^a
RR Rural Residential	1 du/acre	301	15 ^b
RMH Rural Mobilehome	1 du/acre		
SFR Single Family Residential	5.8 du/acre	190	192 ^c
MFR-L Multiple Family Residential Low	11.6 du/acre		
MFR-M Multiple Family Residential Moderate	15 du/acre		
MFR-H Multiple Family Residential High	15 du/acre		
MU Mixed Use	15 du/acre		
CL, M Commercial Lodging, Moderate	15 du/acre		
CL, H Commercial Lodging, High	15 du/acre		
RU Rural Resort	1 du/5 acres	1	---
C Commercial	15 du/acre		
CS Service Commercial	---	3	---
IP Industrial Park	---		
I Industrial	---		
RE Resource Extraction	---		
PF Public/Quasi-Public Facilities	---		
RM Resource Management	1 du/40 acres	4,807	120
OS Open Space	1 du/80 acres		
NHP Natural Habitat Protection	1 du/5 acres		
AG Agriculture	1 du/2.5 ac.	255	68 ^d
AP Area Plan	---		
SP Specific Plan	---	878	690 ^e
Total Private Lands		6,845	1,095
RM Resource Management--Federal/State	---	26,454	---
OS Open Space--LADWP	1 du/80 acres	797	10
OS Open Space--SCE	1 du/80 acres	521	6
Total		34,617	1,111

Notes du = dwelling unit

- 410 acres designated ER-40 (40 acre minimum lot size).
- RR-20 (20 acre minimum lot size).
- The existing subdivision in Mono City has a minimum lot size of 10,000 square feet and provides for 180 units; 125 acres in Lundy Canyon designated SFR 10 (10 acre min. lot size).
- 95 acres at AG 20 (20 acre minimum lot size).
- Figure from **Conway Ranch Specific Plan**.

**TABLE 3
BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS**

Community Planning Area: MONO BASIN SOUTH (LEE VINING)

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre		
RR Rural Residential	1 du/acre		
RMH Rural Mobilehome	1 du/acre		
SFR Single Family Residential	5.8 du/acre	4	23
MFR-L Multiple Family Residential Low	11.6 du/acre		
MFR-M Multiple Family Residential Moderate	15 du/acre		
MFR-H Multiple Family Residential High	15 du/acre		
MU Mixed Use	15 du/acre		
CL, M Commercial Lodging, Moderate	15 du/acre		
CL, H Commercial Lodging, High	15 du/acre		
RU Rural Resort	1 du/5 acres		
C Commercial	15 du/acre	28	420
CS Service Commercial	---		
IP Industrial Park	---		
I Industrial	---	18	---
RE Resource Extraction	---		
PF Public/Quasi-Public Facilities	---	37	---
RM Resource Management	1 du/40 acres		
OS Open Space	1 du/80 acres		
NHP Natural Habitat Protection	1 du/5 acres		
AG Agriculture	1 du/2.5 ac.		
AP Area Plan	---		
SP Specific Plan	---	74	10 ^a
Total Private Lands		161	453 ^b
RM Resource Management--Federal/State	---	4,062	---
OS Open Space--LADWP	1 du/80 acres	2,607	32
OS Open Space--SCE	1 du/80 acres	435	5
Other PF--USFS Mono Lake Visitor Center	---	72	---
Total		7,337	490

Notes: du = dwelling unit

- a. 74 acres = the **Tioga Inn Specific Plan** which permits 10 residential dwelling units. The remaining areas designated on the land use maps as SP are future potential expansion areas for Lee Vining which are now owned by LADWP.
- b. Also includes land leased from LADWP.

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**TABLE 3
BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS**

Community Planning Area: JUNE LAKE

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre	9	9
RR Rural Residential	1 du/acre		
RMH Rural Mobilehome	1 du/acre		
SFR Single Family Residential	5.8 du/acre	164	951
MFR-L Multiple Family Residential Low	11.6 du/acre	9	104
MFR-M Multiple Family Residential Moderate	15 du/acre	9	135
MFR-H Multiple Family Residential High	15 du/acre		
MU Mixed Use	15 du/acre	14	210
CL, M Commercial Lodging, Moderate	15 du/acre	21	315
CL, H Commercial Lodging, High	15 du/acre	20	300
RU Rural Resort	1 du/5 acres	152	---
C Commercial	15 du/acre	26	390
CS Service Commercial	---		
IP Industrial Park	---		
I Industrial	---		
RE Resource Extraction	---	132	---
PF Public/Quasi-Public Facilities	---	4	---
RM Resource Management	1 du/40 acres		
OS Open Space	1 du/80 acres		
NHP Natural Habitat Protection	1 du/5 acres	31	6
AG Agriculture	1 du/2.5 ac.		
AP Area Plan	---		
SP Specific Plan	---	145	1,450 ^a
Total Private Lands		736	3,870
RM Resource Management--Federal/State	---	46,892	---
OS Open Space--LADWP	1 du/80 acres	8,024	100
Other	---		
Total		55,652	3,970

Notes:

du = dwelling unit

- a. 145 acres = **Rodeo Grounds Specific Plan** which permits 10 du/acre. Other sites identified as SP on the June Lake Land Use Maps reflect potential exchange parcels with the US Forest Service.

**TABLE 3
BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS**

Community Planning Area: MAMMOTH VICINITY

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre		
RR Rural Residential	1 du/acre		
RMH Rural Mobilehome	1 du/acre		
SFR Single Family Residential	5.8 du/acre		
MFR-L Multiple Family Residential Low	11.6 du/acre		
MFR-M Multiple Family Residential Moderate	15 du/acre		
MFR-H Multiple Family Residential High	15 du/acre		
MU Mixed Use	15 du/acre		
CL, M Commercial Lodging, Moderate	15 du/acre		
CL, H Commercial Lodging, High	15 du/acre		
RU Rural Resort	1 du/5 acres		
C Commercial	15 du/acre		
CS Service Commercial	---		
IP Industrial Park	---		
I Industrial	---	36	---
RE Resource Extraction	---	304	---
PF Public/Quasi-Public Facilities	---	206	---
RM Resource Management	1 du/40 acres	516	13
OS Open Space	1 du/80 acres		
NHP Natural Habitat Protection	1 du/5 acres		
AG Agriculture	1 du/2.5 acres	3,084	211 ^a
AP Area Plan	---		
SP Specific Plan	---	141	--- ^b
Total Private Lands		4,287	224
RM Resource Management--Federal/State	---	92,623	---
OS Open Space--LADWP	1 du/80 acres	14,136	176
Other--Town of Mammoth Lakes Private Lands	---	(2,200) ^c	---
Total		111,046	400

Notes: du = dwelling unit

- a. Inaja Ranch = 1,234 acres. Inaja Ranch has 26 seasonal use cabins. The remaining 770 acres is estimated to allow a maximum density of 1 du/10 acres.
- b. Hot Creek Ranch = 141 acres. No development plan has been submitted for that seasonal use facility.
- c. This acreage figure is not included in the total acreage since planning authority for those private lands lies with the Town of Mammoth Lakes.

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TABLE 3 BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS
Community Planning Area: LONG VALLEY

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre	349	123 ^a
RR Rural Residential	1 du/acre	143	24 ^b & d
RMH Rural Mobilehome	1 du/acre		
SFR Single Family Residential	5.8 du/acre	339	896 ^c
MFR-L Multiple Family Residential Low	11.6 du/acre		
MFR-M Multiple Family Residential Moderate	15 du/acre	4	60
MFR-H Multiple Family Residential High	15 du/acre	9	135
MU Mixed Use	15 du/acre	37	555
CL, M Commercial Lodging, Moderate	15 du/acre		
CL, H Commercial Lodging, High	15 du/acre		
RU Rural Resort	1 du/5 acres		
C Commercial	15 du/acre	39	585
CS Service Commercial	---	1	---
IP Industrial Park	---		
I Industrial	---		
RE Resource Extraction	---		
PF Public/Quasi-Public Facilities	---	34	---
RM Resource Management	1 du/40 acres		
OS Open Space	1 du/80 acres		
NHP Natural Habitat Protection	1 du/5 acres		
AG Agriculture	1 du/2.5 ac.	3	1
AP Area Plan	---		
SP Specific Plan	---	80	114 ^e
Total Private Lands		1,037	2,493
RM Resource Management--Federal/State	---	10,270	---
OS Open Space--LADWP	1 du/80 acres	8,625	107
Total		19,932	2,600

Notes: du = dwelling unit

- 10 acres designated ER 1.5 (1.5 acre min. lot size); 188 acres designated ER 3(3 acre min. lot size); 122 acres designated ER 5 (5 acre min. lot size).
- 71 acres designated RR 10 (10 acre min. lot size); 69 acres designated RR 5 (5 acre min. lot size).
- 6 acres designated SFR 10,000 (10,000 square feet min. lot size); 179 acres designated SFR 15,000 (15,000 square feet min. lot size); 80 acres designated SFR 0.5 (0.5 acre min. lot size); 50 acres designated SFR 1 (1 acre min. lot size); 24 acres designated SFR 7,500 (7,500 sq. ft. min. lot size).
- 58 acres in Long Valley covers an area impacted by avalanches which requires special studies for development. No development plan has been submitted for that area.
- 80 acres in Hilton Creek is the **Lakeridge Ranch Specific Plan** which permits the development of 114 single family residences.

**TABLE 3
BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS**

Community Planning Area: WHEELER CREST

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre	953	636 ^a
RR Rural Residential	1 du/acre		
RMH Rural Mobilehome	1 du/acre		
SFR Single Family Residential	5.8 du/acre		
MFR-L Multiple Family Residential Low	11.6 du/acre		
MFR-M Multiple Family Residential Moderate	15 du/acre		
MFR-H Multiple Family Residential High	15 du/acre		
MU Mixed Use	15 du/acre		
CL, M Commercial Lodging, Moderate	15 du/acre		
CL, H Commercial Lodging, High	15 du/acre		
RU Rural Resort	1 du/5 acres		
C Commercial	15 du/acre		
CS Service Commercial	---		
IP Industrial Park	---		
I Industrial	---		
RE Resource Extraction	---		
PF Public/Quasi-Public Facilities	---	1	---
RM Resource Management	1 du/40 acres		
OS Open Space	1 du/80 acres		
NHP Natural Habitat Protection	1 du/5 acres		
AG Agriculture	1 du/2.5 acres		
AP Area Plan	---		
SP Specific Plan	---		
Total Private Lands		954	636
RM Resource Management--Federal/State	---	4,149	---
OS Open Space--LADWP	1 du/80 acres	725	9
Other	---		
Total		5,828	645

Notes:

du = dwelling unit

- a. The Wheeler Crest Area Plan limits densities to 1 du/acre in existing developed areas, and 1 du/2 acres in other areas. Dwelling units were calculated assuming 319 acres at 1 du/acre and 634 acres at 1 du/2 acres.

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**TABLE 3
BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS**

Community Planning Area: CHALFANT VALLEY

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre	109	109
RR Rural Residential	1 du/acre		
RMH Rural Mobilehome	1 du/acre	443	365 ^a
SFR Single Family Residential	5.8 du/acre		
MFR-L Multiple Family Residential Low	11.6 du/acre		
MFR-M Multiple Family Residential Moderate	15 du/acre		
MFR-H Multiple Family Residential High	15 du/acre		
MU Mixed Use	15 du/acre		
CL, M Commercial Lodging, Moderate	15 du/acre		
CL, H Commercial Lodging, High	15 du/acre		
RU Rural Resort	1 du/5 acres		
C Commercial	15 du/acre	1	15
CS Service Commercial	---	3	1
IP Industrial Park	---		
I Industrial	---		
RE Resource Extraction	---	40	---
PF Public/Quasi-Public Facilities	---	3	---
RM Resource Management	1 du/40 acres	162	5
OS Open Space	1 du/80 acres		
NHP Natural Habitat Protection	1 du/5 acres		
AG Agriculture	1 du/2.5 acres	1,136	69 ^b
AP Area Plan	---		
SP Specific Plan	---	---	---
Total Private Lands		1,897	564
RM Resource Management--Federal/State	---	44,403	---
OS Open Space--LADWP	1 du/80 acres	7,769	97
Other	---		
Total		54,069	661

Notes:

du = dwelling unit

a. 100 acres at 5 acre minimum lot size; 10 acres at 2 acre minimum lot size.

b. 1,030 acres at 40 acre minimum lot size.

**TABLE 3
BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS**

Community Planning Area: HAMMIL VALLEY

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre		
RR Rural Residential	1 du/acre	411	17 ^a
RMH Rural Mobilehome	1 du/acre		
SFR Single Family Residential	5.8 du/acre		
MFR-L Multiple Family Residential Low	11.6 du/acre		
MFR-M Multiple Family Residential Moderate	15 du/acre		
MFR-H Multiple Family Residential High	15 du/acre		
MU Mixed Use	15 du/acre		
CL, M Commercial Lodging, Moderate	15 du/acre		
CL, H Commercial Lodging, High	15 du/acre		
RU Rural Resort	1 du/5 acres		
C Commercial	15 du/acre		
CS Service Commercial	---		
IP Industrial Park	---		
I Industrial	---		
RE Resource Extraction	---		
PF Public/Quasi-Public Facilities	---	3	---
RM Resource Management	1 du/40 acres	355	9
OS Open Space	1 du/80 acres		
NHP Natural Habitat Protection	1 du/5 acres		
AG Agriculture	1 du/2.5 ac.	6,134	278 ^a
AP Area Plan	---		
SP Specific Plan	---		
Total Private Lands		6,903	304
RM Resource Management--Federal/State	---	60,674	---
Other	---		
Total		67,577	304

Notes:

du = dwelling unit

- a. Hammil Valley has a development credits program which allows a certain number of units to be developed per parcel, depending on the size of the parcel and the ownership. Dwelling units were calculated using the Development Credits Table included in the land use policies for the Tri-Valley.

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**TABLE 3
BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS**

Community Planning Area: BENTON VALLEY

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre		
RR Rural Residential	1 du/acre	1,799	586 ^a
RMH Rural Mobilehome	1 du/acre		
SFR Single Family Residential	5.8 du/acre		
MFR-L Multiple Family Residential Low	11.6 du/acre		
MFR-M Multiple Family Residential Moderate	15 du/acre		
MFR-H Multiple Family Residential High	15 du/acre		
MU Mixed Use	15 du/acre	110	1,650 ^b
CL, M Commercial Lodging, Moderate	15 du/acre		
CL, H Commercial Lodging, High	15 du/acre		
RU Rural Resort	1 du/5 acres	35	---
C Commercial	15 du/acre	15	225 ^b
CS Service Commercial	---		
IP Industrial Park	---		
I Industrial	---	40	---
RE Resource Extraction	---		
PF Public/Quasi-Public Facilities	---	45	---
RM Resource Management	1 du/40 acres	893	22
OS Open Space	1 du/80 acres		
NHP Natural Habitat Protection	1 du/5 acres		
AG Agriculture	1 du/2.5 ac.	3,578	1,391 ^c
AP Area Plan	---		
SP Specific Plan	---		
Total Private Lands		6,515	3,874
RM Resource Management--Federal/State	---	37,248	---
Other	---		
Total		43,763	3,874

Notes:

du = dwelling unit

- 492 acres RR; 288 acres RR 4 (4 acre minimum lot size); 16 acres RR 7 (7 acre minimum lot size); 775 acres RR 5 (5 acre minimum lot size); 134 acres RR 10 (10 acre minimum lot size); 234 acres RR 40 (40 acre minimum lot size).
- Assumes the development of a water and sewer system to obtain this density.
- 202 acres designated AG 5 (5 acre minimum lot size); 22 acres designated AG 7 (7 acre minimum lot size).

TABLE 3 BUILDOUT BY PLANNING AREA AND LAND USE DESIGNATIONS
Community Planning Area: OUTSIDE PLANNING AREAS

Land Use Designation	Density	Acres	Maximum Potential Dwelling Units
ER Estate Residential	1 du/acre	1,367	152 ^a
RR Rural Residential	1 du/acre	6	6
RMH Rural Mobilehome	1 du/acre		
SFR Single Family Residential	5.8 du/acre	132	765
MFR-L Multiple Family Residential Low	11.6 du/acre		
MFR-M Multiple Family Residential Moderate	15 du/acre		
MFR-H Multiple Family Residential High	15 du/acre		
MU Mixed Use	15 du/acre		
CL, M Commercial Lodging, Moderate	15 du/acre		
CL, H Commercial Lodging, High	15 du/acre		
RU Rural Resort	1 du/5 acres	95	---
C Commercial	15 du/acre	34	510 ^b
CS Service Commercial	---	3	---
IP Industrial Park	---		
I Industrial	---		
RE Resource Extraction	---	80	---
PF Public/Quasi-Public Facilities	---	2	---
RM Resource Management	1 du/40 acres	21,683	542
OS Open Space	1 du/80 acres		
NHP Natural Habitat Protection	1 du/5 acres		
AG Agriculture	1 du/2.5 ac.	10,999	2,524 ^c
SAA Scenic Area Agriculture		4	4
AP Area Plan	---		
SP Specific Plan	---		
Total Private Lands		34,404	4,503
RM Resource Management--Federal/State	---	1,323,992	---
OS Open Space--LADWP	1 du/80 acres	19,038	238
OS Open Space--Sierra Pacific Power	1 du/80 acres	946	11
OS Open Space--SCE	1 du/80 acres	380	4
Total		1,378,760	4,756

Notes: du = dwelling unit

- a. 286 acres designated ER 5 (5 acre minimum lot size); 221 acres designated ER 20 (20 acre minimum lot size); 796 acres designated ER 40 (40 acre minimum lot size).
- b. Assumes the development of a water and sewer system to obtain this density.
- c. Dwelling unit potential for 5,182 acres calculated using the development credits program established in Hammil Valley which allows a certain number of units to be developed per parcel, depending on the size of the parcel and the ownership. In Huntoon/Buckeye Valley it results in 200 potential du for the 5,182 acres.

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APPENDIX B--SUMMARY OF PROPOSED LAND USE DESIGNATION CHANGES BY COMMUNITY LAND USE MAPS

The following summarizes the proposed revisions in land use designations by Community Land Use Maps (Figures 1-105 in the Land Use Element of the General Plan). Maps showing the proposed changes are available with the project packet. Many of these changes are changes in name only, a switch from the old land use designation to the proposed new integrated land use/zoning designation. Substantive changes include the establishment of minimum lot sizes for specific parcels or areas of parcels, corrections of existing designations, and revisions based on recommendations from community planning meetings. In the following summary, comments in ***bold and italic print*** indicate substantive changes. Comments in plain print indicate changes in name only.

Figure 1 Topaz Lake Area (Figure 1 in the 1993 General Plan)

1. ***MU property designated MU 1 (1 acre minimum parcel size).***
 - A 1 acre minimum parcel size has been added to the 1993 MU designation. One acre is the smallest permissible parcel size with individual wells and septic systems.
 - One acre is consistent with recommendations from the RPAC and community.
 - One acre is consistent with the current minimum lot size.
2. ***Agricultural property designated AG 10 (10 acre minimum parcel size).***
 - The 10 acre minimum parcel size was established after extensive meetings with the RPAC and Antelope Valley agricultural landowners.
 - Various minimum lot sizes were reviewed, including the development credits concept established for Hammil Valley, before agreeing on the 10 acre minimum.
 - The General Plan notes that a minimum parcel size would be established as part of the rezoning process: "Establish adequate minimum parcel sizes for viable agricultural lands and encourage consolidation of undersized parcels. Consider amending the Zoning Code to address minimum parcel sizes in appropriate zoning districts" (1993 General Plan, Conservation /Open Space Element, Agriculture Policies, Obj. A, Policy 1, Action 1.2).
3. ***40 acre private parcel on east side of Topaz lake designated RM 40 (40 acre minimum parcel size).***
 - The RM designation has a minimum lot size of 40 acres (1993 General Plan, Land Use Element, RM Designation).
 - The parcel is constrained by deed restrictions limiting usage to recreational uses.
4. **Areas designated as ER now designated RR.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations. ER and RR permit the same uses, but RR permits limited commercial agricultural.

Figure 2 Pinky's Point (New figure not included in the 1993 General Plan)

Detail map of a portion of Figure 1 showing the Topaz Lake area. See Comment # 1 for Figure 1.

Figure 3 Palmer Subdivision (New figure not included in the 1993 General Plan)

Detail map of a portion of Figure 1 showing the Palmer subdivision area. See Comment # 4 for Figure 1.

Figure 4 Topaz Southeast (Figure 2 in the 1993 General Plan)

1. *Agricultural property designated AG 10 (10 acre minimum parcel size).*
 - The 10 acre minimum parcel size was established after extensive meetings with the RPAC and Antelope Valley agricultural landowners.
 - Various minimum lot sizes were reviewed, including the development credits concept established for Hammil Valley, before agreeing on the 10 acre minimum.
 - The General Plan notes that a minimum parcel size would be established as part of the rezoning process: “Establish adequate minimum parcel sizes for viable agricultural lands and encourage consolidation of undersized parcels. Consider amending the Zoning Code to address minimum parcel sizes in appropriate zoning districts” (1993 General Plan, Conservation /Open Space Element, Agriculture Policies, Obj. A, Policy 1, Action 1.2).

Figure 5 Topaz Community Area (Figure 3 in the 1993 General Plan)

1. *Agricultural property designated AG 10 (10 acre minimum parcel size).*
 - The 10 acre minimum parcel size was established after extensive meetings with the RPAC and Antelope Valley agricultural owners.
 - The General Plan notes that a minimum parcel size would be established as part of the rezoning process: “Establish adequate minimum parcel sizes for viable agricultural lands and encourage consolidation of undersized parcels. Consider amending the Zoning Code to address minimum parcel sizes in appropriate zoning districts” (1993 General Plan, Conservation /Open Space Element, Agriculture Policies, Obj. A, Policy 1, Action 1.2).
2. *Removed the Public Facilities (PF) designation for the Post Office, redesignated AG.*
 - This was requested by the property owner based on the possibility that the Post Office may be removed at some time. Public and quasi-public buildings are permitted in all districts, subject to use permit (Mono County Code 19.03.050 B 1).
3. *Area designated as ER redesignated RR*
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations. ER and RR permit the same uses, but RR permits limited commercial agricultural.
4. **Tule’s Resort.**
 - Concern was raised that because of the 1997 flooding Tule’s Resort is being considered for possible acquisition, and is the only property designated Commercial. No change is recommended at this time. If the property is acquired by Mono County, it may be appropriate to consider alternative site(s) for commercial designation. Alternative sites must conform to the following General Plan policy: “Concentrate commercial development within existing communities.” (1993 General Plan, Countywide Land Use Policies, Objective D, Policy 1).

Figure 6 Topaz Community (New figure not included in the 1993 General Plan)

Detail map of a portion of Figure 5. See Comments for Figure 5.

Figure 7 Northern Antelope Valley (Figure 4 in the 1993 General Plan)

1. *Agricultural property designated AG 10 (10 acre minimum parcel size).*
 - The 10 acre minimum parcel size was established after extensive meetings with the RPAC and Antelope Valley agricultural landowners.
 - Various minimum lot sizes were reviewed, including the development credits concept established for Hammil Valley, before agreeing on the 10 acre minimum.
 - The General Plan notes that a minimum parcel size would be established as part of the rezoning process: “Establish adequate minimum parcel sizes for viable

agricultural lands and encourage consolidation of undersized parcels. Consider amending the Zoning Code to address minimum parcel sizes in appropriate zoning districts” (1993 General Plan, Conservation /Open Space Element, Agriculture Policies, Obj. A, Policy 1, Action 1.2).

2. **Redesignation of the northern portion of APN 01-150-15 as Industrial Park (IP).**
 - An industrial designation on this alternative site was found to be more compatible with surrounding land uses than elsewhere in Antelope Valley. A site approximately 3 miles to the south (see Figure 12) which was designated IP in the 1993 General Plan was redesignated Agriculture (AG). Land use policies for the Antelope Valley state: “Provide for a mix if residential, commercial, recreational, institutional, and light industrial land uses within defined community areas, in a manner consistent with the overall goal for the Antelope Valley,” and “Designate suitable lands for light industrial uses within community areas. Designated light industrial use areas should be limited to community serving industrial uses that will have no adverse environmental impacts. All industrial development must be compatible with surrounding land uses.” (1993 General Plan, Land Use Element, Antelope Valley Policies, Obj. A, Policy 2 and Action 2.3).

Figure 8 Northern Coleville Area (Figure 5 in the 1993 General Plan)

1. **Agricultural property designated AG 10 (10 acre minimum parcel size).**
 - The 10 acre minimum parcel size was established after extensive meetings with the RPAC and Antelope Valley agricultural landowners.
 - Various minimum lot sizes were reviewed, including the development credits concept established for Hammil Valley, before agreeing on the 10 acre minimum.
 - The General Plan notes that a minimum parcel size would be established as part of the rezoning process: “Establish adequate minimum parcel sizes for viable agricultural lands and encourage consolidation of undersized parcels. Consider amending the Zoning Code to address minimum parcel sizes in appropriate zoning districts” (1993 General Plan, Conservation /Open Space Element, Agriculture Policies, Obj. A, Policy 1, Action 1.2).
2. **A base designation of ER has been added to the SP designation.**
 - A base designation of ER has been added permitting residential uses and development without the need to prepare a specific plan. A specific plan is required for uses other than those permitted by the ER designation or for subdivisions of 50 or more lots and would provide greater flexibility in meeting county requirements.
3. **Designate the Coleville cemetery as Public Facilities (PF).**
 - Public and quasi-public land uses were designated Public Facilities (PF) in the 1993 General Plan. The Coleville cemetery properties were overlooked.
4. **Areas designated as ER now designated RR.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations. ER and RR permit the same uses, but RR permits limited commercial agricultural.

Figure 9 Antelope Valley (Figure 6 in the 1993 General Plan)

1. **Agricultural property designated AG 10 (10 acre minimum parcel size).**
 - The 10 acre minimum parcel size was established after extensive meetings with the RPAC and Antelope Valley agricultural landowners.
 - Various minimum lot sizes were reviewed, including the development credits concept established for Hammil Valley, before agreeing on the 10 acre minimum.

- The General Plan notes that a minimum parcel size would be established as part of the rezoning process: “Establish adequate minimum parcel sizes for viable agricultural lands and encourage consolidation of undersized parcels. Consider amending the Zoning Code to address minimum parcel sizes in appropriate zoning districts” (1993 General Plan, Conservation /Open Space Element, Agriculture Policies, Obj. A, Policy 1, Action 1.2).

Figure 10 Coleville Area (Figure 7 in the 1993 General Plan)

1. *Map corrections:*
 - a. *Extend the PF designation to include all of the High School property.*
 - Not all of the school property was originally included.
 - b. *Expand the RU designation to include the Meadow Cliff lodge and restaurant. The current designation only denotes the motel expansion.*
 - Much of the existing Meadow Cliff development was not designated. This corrects that error.
 - c. *Extend the SP/ER designation south from Coleville along the base of the hill.*
 - Reflects comments to the RPAC to extend the community expansion area. This is consistent with the General Plan policy: “Guide future development to occur in and adjacent to Walker, Coleville, and Topaz.” (1993 General Plan, Land Use Element, Antelope Valley Policies, Objective A).
 - A base designation of ER has been added permitting residential use and development without the need to prepare a specific plan. A specific plan is required for uses other than ER or for divisions of 50 or more lots. A specific plan provides greater flexibility in meeting county requirements.
2. *Areas in Coleville designated C and ER redesignated as MU.*
 - Redesignated in order to concentrate commercial development within the existing communities. This is consistent with the General Plan policy: “Guide future development to occur in and adjacent to Walker, Coleville, and Topaz.” (1993 General Plan, Land Use Element, Antelope Valley Policies, Objective A).
3. *Agricultural property designated AG 10 (10 acre minimum parcel size).*
 - The 10 acre minimum parcel size was established after extensive meetings with the RPAC and Antelope Valley agricultural landowners.
 - Various minimum lot sizes were reviewed, including the development credits concept established for Hammil Valley, before agreeing on the 10 acre minimum.
 - The General Plan notes that a minimum parcel size would be established as part of the rezoning process: “Establish adequate minimum parcel sizes for viable agricultural lands and encourage consolidation of undersized parcels. Consider amending the Zoning Code to address minimum parcel sizes in appropriate zoning districts” (1993 General Plan, Conservation /Open Space Element, Agriculture Policies, Obj. A, Policy 1, Action 1.2).

Figure 11 Coleville Community (New figure not included in the 1993 General Plan)

Detail map of a portion of Figure 8 showing the Coleville community area. See comments for Figure 10 .

Figure 12 Southern Antelope Valley (Figure 8 in the 1993 General Plan)

1. *Agricultural property designated AG 10 (10 acre minimum parcel size).*
 - The 10 acre minimum parcel size was established after extensive meetings with the RPAC and Antelope Valley agricultural landowners.
 - Various minimum lot sizes were reviewed, including the development credits concept established for Hammil Valley, before agreeing on the 10 acre minimum.

- The General Plan notes that a minimum parcel size would be established as part of the rezoning process: “Establish adequate minimum parcel sizes for viable agricultural lands and encourage consolidation of undersized parcels. Consider amending the Zoning Code to address minimum parcel sizes in appropriate zoning districts” (1993 General Plan, Conservation /Open Space Element, Agriculture Policies, Obj. A, Policy 1, Action 1.2).
2. **Area designated as Light Industrial (LI) has been redesignated as Agricultural (AG).**
 - This change was based upon input the Planning Commission and RPAC received at community meetings and from letters from adjacent property owners. Objections were raised to the site's visibility and proximity to existing residential uses. Most notable was the incompatibility with surrounding land uses.
 - An alternative light industrial site was selected approximately 3 miles north (northwest corner of the intersection of Eastside Lane and Topaz Lane--see Figure 7).
 - Land use policies for the Antelope Valley state: “Provide for a mix if residential, commercial, recreational, institutional, and light industrial land uses within defined community areas, in a manner consistent with the overall goal for the Antelope Valley,” and “Designate suitable lands for light industrial uses within community areas. Designated light industrial use areas should be limited to community serving industrial uses that will have no adverse environmental impacts. All industrial development must be compatible with surrounding land uses.” (1993 General Plan, Land Use Element, Antelope Valley Policies, Obj. A, Policy 2 and Action 2.3)
 3. **Area designated as ER now designated ER 3. (3 acre minimum parcel size).**
 - The addition of the 3 acre minimum lot size is consistent with the existing minimum parcel size established at the time of the subdivision.

Figure 13 Eastside Lane Area (Figure 9 in the 1993 General Plan)

1. **Area designated as Light Industrial (LI) has been redesignated as Agricultural (AG).**
 - See comments under Figure 12.
2. **The minimum lot size for the LLR 10 was revised to reflect a 9 acre minimum lot size.**
 - The change to a 9 acre minimum was based upon input given the RPAC to preserve the larger parcel size yet still provide for some potential for subdivision.
 - This is only applicable to those parcels previously designated; no new parcels have been added.
3. **Area designated as ER now designated ER 3 (3 acre minimum parcel size).**
 - The addition of the 3 acre minimum lot size is consistent with the existing minimum parcel size established at the time of the subdivision.
4. **Areas designated as LLR now designated as RR (East Side Lane/ Camp Antelope/ Stock Drive)**
 - This change in land use designation is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 14 Walker Area (Figure 10 in the 1993 General Plan)

1. **Agricultural property designated AG 10 (10 acre minimum parcel size).**
 - The 10 acre minimum parcel size was established after extensive meetings with the RPAC and Antelope Valley agricultural landowners.
 - Various minimum lot sizes were reviewed, including the development credits concept established for Hammil Valley, before agreeing on the 10 acre minimum.

- The General Plan notes that a minimum parcel size would be established as part of the rezoning process: "Establish adequate minimum parcel sizes for viable agricultural lands and encourage consolidation of undersized parcels. Consider amending the Zoning Code to address minimum parcel sizes in appropriate zoning districts" (1993 General Plan, Conservation /Open Space Element, Agriculture Policies, Obj. A, Policy 1, Action 1.2).
- 2. The minimum lot size for the LLR 10 was revised to reflect a 9 acre minimum lot size.**
 - The change to a 9 acre minimum was based upon input given the RPAC to preserve the larger parcel size yet still provide for some potential for subdivision.
 - This is only applicable to those parcels previously designated; no new parcels have been added.
- 3. A 120 acre area designated RM & OS has been redesignated RR 5 (5 acre lot size, 11 lots maximum).**
 - Approximately 120 acres of land previously owned by Sierra Pacific Power have been redesignated from RM and OS to RR 5. Based upon a development concept presented to the RPAC, the new property owners agreed to a maximum of 11 lots for the property,
- 4. Area designated LLR at entrance to Walker River Canyon redesignated RR 10 (10 acre minimum lot size).**
 - The increase in minimum lot size was recommended by the RPAC, in part due to the 1997 flooding.
- 5. Camp Antelope Indian Housing designated as ER .**
 - The change in designation is based on a recent determination that the County has land use authority over this property.
 - The ER designation is consistent with the adjacent land use designation.
- 6. MU property designated MU 1 (1 acre minimum lot size).**
 - A 1 acre minimum parcel size has been added to the 1993 MU designation. One acre is the smallest permissible parcel size with individual wells and septic systems.
 - One acre is consistent with recommendations from the RPAC and community.
 - One acre is consistent with the current minimum lot size.
- 7. Redesignated 23 acres as RR 5, shown as AG in the 1993 General Plan.**
 - Information was presented to the Planning Commission and the RPAC that the property has never been farmed and does not have any water shares.
 - The change to RR 5 is consistent with a number of policies for Antelope Valley, including "Maintain the largelot residential nature of the Hwy. 395 corridor (1993 General Plan, Land Use Element, Antelope Valley Policies, Objective A, Policy 3, Action 3.3).
 - The RPAC noted that the RR designation would provide a better transition between town and residential areas.
- 8. Area designated ER on Patricia Lane now designated RMH.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
 - This is consistent with the present zoning for the property.
- 9. Areas designated as LLR now designated as RR.**

- This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
- The designation change will reducing public confusion.

Figure 15 Walker Town Site (New figure not included in the 1993 General Plan)

Detail map of a portion of Figure 14 showing the Walker town site area. See Comments 6 and 7 for Figure 14.

Figure 16 Sonora Junction (New figure not included in the 1993 General Plan)

1. This map was prepared to show the existing County resource extraction site.
 - Part of the County effort to designate existing resource extraction sites as Resource Extraction (RE).
 - The General Plan states that “Mineral resource development activities may be permitted only in those areas designated for Resource Management and zoned Resource Extraction. Extraction of saleable materials/aggregates (e.g. sand or gravel) may also be permitted in areas designated Agriculture and zoned Resource Extraction. (1993 General Plan, Conservation/Open Space Element, Mineral Policies, Objective C, Action 2.2).

Figure 17 Willow Flats (New figure not included in the 1993 General Plan)

1. This map shows a remote area previously subdivided and rezoned. The parcels are designated ER (the new land use designation for the existing RR zoning), with the minimum 15 parcel size reflecting the adopted minimum parcel size. The smaller parcels were not previously zoned; the 4 acre parcel size is consistent with the largest parcel. This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 18 Fales Hot Springs (Figure 11 in the 1993 General Plan)

1. **The map has been corrected to identify the Fales Hot Springs pools/structures as RU.**
 - This area is outside of a planning area.
 - This corrects an oversight from the 1993 General Plan.
2. **The RU designation for the Link property .**
 - The property was redesignated RU in accordance with the adoption of GPA 98-03b.
3. **Areas designated LLR redesignated ER. The general plan minimum lot sizes have been retained.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 19 Devil's Gate (Figure 12 in the 1993 General Plan)

1. **Areas designated LLR redesignated ER. The general plan minimum lot sizes have been retained.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 20 Swauger Creek (Figure 13 in the 1993 General Plan)

1. **Areas designated LLR redesignated ER. The general plan minimum lot sizes have been retained.**

- This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 21 Bridgeport Reservoir (Figure 14 in the 1993 General Plan)

1. *A 40 acre area designated AG east of the County Park redesignated SP/ER as an expansion area for the Bridgeport community.*
 - The General Plan states “Guide future development to occur on existing private lands in Bridgeport Townsite, east of Bridgeport Reservoir, in the Evans Tract, and at Twin Lakes.” (1993 General Plan, Land Use Element, Bridgeport policies, Objective A).
2. **Owens Valley Indian Housing Authority housing north of the County Park currently designated LR; redesignated SFR.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 22 Bridgeport Lake Resort Subdivision (New figure not included in the 1993 General Plan)

Detail map of a portion of Figure 21 showing the Bridgeport Lake Resort Subdivision. No changes are necessary, the subdivision retains its ER designation.

Figure 23 Bridgeport Community (Figure 15 in the 1993 General Plan)

1. *A 40 acre area designated AG east of the County Park redesignated SP/ER as an expansion area for the Bridgeport community.*
 - The General Plan states “Guide future development to occur on existing private lands in Bridgeport Townsite, east of Bridgeport Reservoir, in the Evans Tract, and at Twin Lakes.” (1993 General Plan, Land Use Element, Bridgeport policies, Objective A).
2. *HR redesignated MU.*
 - The RPAC reviewed the proposed change and determined that the property did exhibit a mix of residential and commercial uses (multi-family and mini storage), in keeping with General Plan intent for the MU designation.
 - The MU designation is intended to provide a transition between intensive commercial uses and residential uses. The General Plan states that this “designation should be applied only in areas which have existing mixed use development” (1993 General Plan, Land Use Element, Mixed Use Land Use Designation).
3. *Aurora Canyon/North Buckeye area redesignated MFR-M (currently LR).*
 - Reflects the current multiple family zoning for the property.
4. *USFS warehouse redesignated I (currently PF); adjacent parcels redesignated IP (currently LR).*
 - The owners have requested that the property retain the present Industrial and Industrial Park zoning.
 - The RPAC reviewed retaining the present Industrial and Industrial Park zoning.
 - Reflects the current Industrial and Industrial Park zoning.
 - New industrial uses will be subject to either a Director Review Permit or Use Permit, with notice to adjacent owners. Staff anticipates objections from adjacent residents for uses that may be objectionable because of noise, dust, traffic or potential significant environmental impacts. Uses other than industrial will require a General Plan Amendment.
5. *Two areas designated RM north and east of town have been redesignated SP/ER.*

- The SP/ER designation gives the property owner greater flexibility in potential future development of the property, without overlooking the environmental sensitivity of the parcels.
 - The ER base designation permits residential use without the need to prepare a Specific Plan. A specific plan is required for uses other than those permitted by the ER designation or for divisions of 50 or more lots.
6. **Area designated ER west of and adjacent to the Airport has been redesignated CS.**
 - Information received regarding potential future use of the property included a mix of commercial avionics uses and multi-family residential use.
 - The CS designation would provide for aviation/commercial uses.
 7. **Areas designated MR redesignated MFR-L.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
 8. **Areas designated LR redesignated SFR.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 24 Aurora Canyon (New figure not included in the 1993 General Plan)
 Detail map of a portion of Figure 23. See Comments 2, 3, 4, 6, and 8 for Figure 23.

Figure 25 Bridgeport Town Site (New figure not included in the 1993 General Plan)
 Detail map of a portion of Figure 23. See Comments 2, 5, 6 and 7 for Figure 23.

- Figure 26 Evans Tract (Figure 16 in the 1993 General Plan)**
1. **The area north of the Forest Service redesignated IP from RM and LI.**
 - The property owner requested that the industrial (LI) designation be extended to include this portion of his property.
 - Portions of the property have an industrial character because of the heavy equipment kept on the property.
 2. **Lots east of Forest Service redesignated RR from ER and LI.**
 - Comments from community rezoning meetings noted that this area was best suited for residential uses.
 3. **Residential area along Carner Drive and Aspen Lane redesignated SFR 1/2 (1/2 acre minimum lot size) from ER.**
 - The smallest lot size permitted without a sewer system.
 - Some smaller lots already in existence.
 4. **All frontage lots along Highway. 395 in Evans Tract redesignated MU.**
 - Owners noted the subdivision had designated the highway frontage lots as commercial.
 5. **Area adjacent to the Catholic Church redesignated MU from C.**
 - Change requested by owners. The RPAC reviewed and approved the proposed change.
 6. **Extension of MU south from the Evans Tract fronting on Hwy. 395, redesignated MU from ER.**
 - Change requested by owners. The RPAC approved the proposed change.

NOTE: The extensive use of the MU designation for over nearly a mile is in direct conflict with existing general plan policies which seek to concentrate such

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development within communities and to avoid the potential for strip commercial development.

Figure 27 Willow Springs (Figure 17 in the 1993 General Plan)

1. *A map correction showing the private property (4 lots) north of Settlement Restaurant as ER from RM/BLM.*
 - An oversight of existing private lands.
2. *The RM parcel at 395 and Bodie Road redesignated as RU.*
 - To reflect the proposed Bodie RV Specific Plan.

Figure 28 Rancheria (Figure 18 in the 1993 General Plan)

No changes in land use designations.

Figure 29 Twin Lakes Area (Figure 19 in the 1993 General Plan)

1. **Areas designated LR redesignated SFR.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 30 Twin Lakes Subdivision (New figure not included in the 1993 General Plan)

Detail map of a portion of Figure 29. See Comment 1 for Figure 29.

Figure 31 Sweetwater Ranch Area (New figure not included in the 1993 General Plan)

1. Shows the development credits for Bridgeport agricultural area. All agricultural parcels have been shown with assigned development credits.

Figure 32 Old Ranger Station (New figure not included in the 1993 General Plan)

1. Shows the development credits for Bridgeport agricultural area. All agricultural parcels have been shown with assigned development credits. The minimum parcel sizes adopted for the Sweetwater Subdivision have been retained.

Figure 33 Rancheria Area (New figure not included in the 1993 General Plan)

1. Shows the development credits for Bridgeport agricultural area. All agricultural parcels have been shown with assigned development credits.

Figure 34 Hunewill Ranch Area (New figure not included in the 1993 General Plan)

1. Shows the development credits for Bridgeport agricultural area. All agricultural parcels have been shown with assigned development credits.

Figure 35 Upper Summers Meadows Area (New figure not included in the 1993 General Plan)

1. Shows the development credits for Bridgeport agricultural area. All agricultural parcels have been shown with assigned development credits.

Figure 36 Bridgeport Reservoir North Area (New figure not included in the 1993 General Plan)

1. Shows the development credits for Bridgeport agricultural area. All agricultural parcels have been shown with assigned development credits.

Figure 37 Bridgeport Reservoir South Area (New figure not included in the 1993 General Plan)

1. Shows the development credits for Bridgeport agricultural area. All agricultural parcels have been shown with assigned development credits.

Figure 38 Big Hot Springs Area (New figure not included in the 1993 General Plan)

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1. Shows the development credits for Bridgeport agricultural area. All agricultural parcels have been shown with assigned development credits.
- Figure 39 Point Ranch Area (New figure not included in the 1993 General Plan)**
1. Shows the development credits for Bridgeport agricultural area. All parcels have been shown with assigned development credits.
- Figure 40 Lower Summers Meadow Area (New figure not included in the 1993 General Plan)**
1. Shows the development credits for Bridgeport agricultural area. All agricultural parcels have been shown with assigned development credits.
- Figure 41 Masonic Springs Area (New figure not included in the 1993 General Plan)**
1. Shows the development credits for Bodie Hills area. All agricultural parcels have been shown with assigned development credits.
- Figure 42 Bodie Hills Area (New figure not included in the 1993 General Plan)**
1. Shows the development credits for Bodie Hills area. All agricultural parcels have been shown with assigned development credits.
- Figure 43 Clearwater Creek Area (New figure not included in the 1993 General Plan)**
1. Shows the development credits for Bodie Hills area. All agricultural parcels have been shown with assigned development credits.
- Figure 44 Bodie Detail (New figure not included in the 1993 General Plan)**
1. Shows the Bodie State Park area; reflects the recent State Park purchase.
- Figure 45 Conway Summit (New figure not included in the 1993 General Plan)**
1. A new map showing the land use designations for this area in more detail.
- Figure 46 Lundy/Mono City Area (New figure not included in the 1993 General Plan)**
1. A new map showing the land use designations for this area in more detail.
- Figure 47 Lundy Canyon Area (New figure not included in the 1993 General Plan)**
1. A new map showing the land use designations for this area in more detail.
- Figure 48 Virginia/Lundy Lake Area (New figure not included in the 1993 General Plan)**
1. **Areas designated LLR 10 now designated ER 10.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
 2. **Areas designated LR now designated ER.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
- Figure 49 Virginia Lake Subdivision (Figure 20 in the 1993 General Plan)**
1. **Areas designated LLR 10 now designated ER 10.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
 2. **Areas designated LLR now designated ER 5.**

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- This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
3. **Areas designated LR now designated SFR and SFR 1/2.**
- 1/2 acre is the smallest permissible parcel size without a community sewer system.
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 50 Lundy Lake Resort (New figure not included in the 1993 General Plan)

1. A new map showing the land use designations for this area in more detail.
 - The area occupied by the Lundy Lake Resort is designated as Commercial (C).
 - Private property is designated Estate Residential (ER).
 - Parcels owned by SCE are shown as Open Space (OS). This is in conformance with General Plan policies which state "Designate undeveloped lands owned by out-of-county agencies such as the Los Angeles Department of Water and Power (DWP), and the Walker River Irrigation District (WRID), or by utility entities such as Sierra Pacific Power Company, and Southern California Edison (SCE) as "Open Space" ("OS") or "Agriculture" in this element" (1993 General Plan, Land Use Element, Objective F, Policy 2, Action 2.2).

Figure 51 Mono City (Figure 21 in the 1993 General Plan)

1. **Areas designated LR now designated SFR 10,000 to reflect existing minimum parcel size of 10,000 square feet.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 52 Lundy Lake Subdivision (Figure 22 in the 1993 General Plan)

1. **Areas designated LLR now designated SFR 10 to reflecting existing minimum parcel size and zoning of 10 acres.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 53 Mono Lake North (New figure not included in the 1993 General Plan)

1. A new map showing the land use designations for this area in more detail.

Figure 54 Mono Lake South (New figure not included in the 1993 General Plan)

1. A new map showing the land use designations for this area in more detail.

Figure 55 Mono Lake Central (New figure not included in the 1993 General Plan)

1. A new map showing the land use designations for this area in more detail.

Figure 56 Coyote Springs Area (New figure not included in the 1993 General Plan)

1. A new map showing the land use designations for this area in more detail.

Figure 57 Cottonwood Canyon (New figure not included in the 1993 General Plan)

1. A new map showing the land use designations for this area in more detail. Some property owners have requested an agricultural designation.

Figure 58 Waford Springs (New figure not included in the 1993 General Plan)

1. A new map showing the land use designations for this area in more detail.

Figure 59 Pole Line Area (New figure not included in the 1993 General Plan)

1. A new map showing the land use designations for this area in more detail.

Figure 60 Lee Vining Area (Figure 23 in the 1993 General Plan)

1. *A new regional map, which better reflects the community area and shows the latest parcel configuration, including parcels transferred from LADWP ownership to private ownership.*
2. *Two new lots south of the community have been designated Commercial (C) [sold by LADWP, previously designated Open Space (OS)].*
3. *Parcel exchanged for the community center has been redesignated Public Facilities (PF).*
4. **High Industrial (HI) has been redesignated Industrial (I).**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
5. **Areas designated LR redesignated SFR.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 61 Lee Vining Community (Figure 23a in the 1993 General Plan)

1. *Post Office site redesignated Commercial (C) from Public Facilities (PF).*
2. **Areas designated LR redesignated SFR.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 62 June Lake Planning Area/Walker and Parker Lake (Figure 24 in the 1993 General Plan)

1. *Added an Estate Residential 6 (ER 6) designation to the Specific Plan (SP) designation of Walker Lake - SP/ER 6 (1 du/6 acres).*
2. Includes the landfill site (February 1995 General Plan Amendment)..

Figure 63 Rush Creek (Figure 25 in the 1993 General Plan)

1. *This map was revised to show existing resource extraction sites.*
 - Part of the county effort to designate existing resource extraction sites as Resource Extraction (RE).
 - The General Plan states "Amend the County Zoning and Development Code to provide for a Resource Extraction (RE) District. The Resource Extraction District shall provide appropriate regulations with respect to mineral resource development;" and "Mineral resource development activities may be permitted only in those areas designated for Resource management and zoned Resource Extraction. Extraction of saleable materials/aggregates (e.g. sand or gravel) may also be permitted in areas designated Agriculture and zoned Resource Extraction" (1993 General Plan, Conservation/Open Space Element, Objective C, Actions 2.1 and 2.2).

Figure 64 Pine Cliff (Figure 26 in the 1993 General Plan, Amended in 1995)

No changes in land use designations.

Figure 65 June Lake Village (Figure 27 in the 1993 General Plan)

1. LR redesignated to SFR.

HR redesignated to MFR, H.

- These changes in land use designations are part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 66 West Village/Rodeo Grounds (Figure 28 in the 1993 General Plan)

1. **HR redesignated to MFR, H.
MR redesignated to MFR, L.
LR redesignated to SFR.**

- These changes in land use designations are part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 67 Down Canyon June Lake (Figure 29 in the 1993 General Plan)

1. **LR redesignated to SFR.
MR redesignated to MFR, L.**

- These changes in land use designations are part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 68 Silver Lake Meadow (Figure 30 in the 1993 General Plan)

No changes in land use designations.

Figure 69 Mammoth Vicinity Area (Figure 31 in the 1993 General Plan)

1. Map changes reflect existing resource extraction sites and the agricultural designation of the Arcularius Ranch.

Figure 70 Benton Crossing (Figure 31a in the 1995 General Plan Amendment)

No changes in land use designations.

Figure 71 Hot Creek Kaolin Mine (New figure not included in the 1993 General Plan)

1. **This map was prepared to show an existing resource extraction site.**

- Part of the county effort to designate existing resource extraction sites as Resource Extraction (RE).
- The General Plan states "Amend the County Zoning and Development Code to provide for a Resource Extraction (RE) District. The Resource Extraction District shall provide appropriate regulations with respect to mineral resource development;" and "Mineral resource development activities may be permitted only in those areas designated for Resource management and zoned Resource Extraction. Extraction of saleable materials/aggregates (e.g. sand or gravel) may also be permitted in areas designated Agriculture and zoned Resource Extraction" (1993 General Plan, Conservation/Open Space Element, Objective C, Actions 2.1 and 2.2).

Figure 72 Owens River Ranch and Arcularius Ranch (Figure 33 in the 1993 General Plan)

1. **Redesignate the Arcularius Ranch Agriculture (AG) and take necessary actions to repeal the Arcularius Ranch Specific Plan.**

- The new owners of the Arcularius Ranch intend to use the property as a private ranch and to terminate existing commercial operations.
- This action is consistent with General Plan policies: "Promote the continuation of agricultural uses, including aquaculture uses, that are compatible with the rural recreational and open space values of the area;" and "Allow for the continuation and

reasonable expansion of agricultural uses, including grazing and aquaculture uses, in a manner consistent with the environmental and recreational values of the area” (1993 General Plan, Land Use Element, Upper Owens River Policies, Objective C, Policy 1).

Figure 73 Inaja Ranch (Figure 34 in the 1993 General Plan)

See comments for Figure 72.

Figure 74 Lower Arcularius Ranch (Figure 35 in the 1993 General Plan)

No changes in land use designations.

Figure 75 Mammoth Airport Land Use Plan (Figure 32 in the 1993 General Plan)

No changes in land use designations.

Figure 76 Casa Diablo (New figure not included in the 1993 General Plan)

1. **This map was prepared to show an existing resource extraction site.**
 - Part of the county effort to designate existing resource extraction sites as Resource Extraction (RE).
 - The General Plan states “Amend the County Zoning and Development Code to provide for a Resource Extraction (RE) District. The Resource Extraction District shall provide appropriate regulations with respect to mineral resource development;” and “Mineral resource development activities may be permitted only in those areas designated for Resource management and zoned Resource Extraction. Extraction of saleable materials/aggregates (e.g. sand or gravel) may also be permitted in areas designated Agriculture and zoned Resource Extraction” (1993 General Plan, Conservation/Open Space Element, Objective C, Actions 2.1 and 2.2).
2. A potential industrial expansion area is shown near the resource extraction site.

Figure 77 Long Valley (Figure 36 in the 1993 General Plan)

1. *The LR site on the east side of Highway 395 has been redesignated CS.*
 - This parcel is isolated from most of the community and near the Caltrans McGee Creek Maintenance Station.
2. *A number of parcels were redesignated to retain their existing C zoning .*
 - On Crowley Lake Drive a number of parcels were redesignated to retain their existing C zoning. These owners believed that the commercial designation better reflected current uses.
3. *A base designation of ER has been added to the SP designation.*
 - A base designation of ER has been added permitting residential use and development without the need to prepare a specific plan. A specific plan is required for uses other than ER or for divisions of 50 or more lots. A specific plan provides greater flexibility in meeting county requirements.
4. **Areas designated LLR redesignated ER with 5 and 10 acre minimum parcel sizes.**
 - These changes in land use designations are part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
 - The LLR designation has a 5 acre minimum parcel size.

Figure 78 Long Valley Community (Figure 36 in the 1993 General Plan)

1. *A number of parcels were redesignated to retain their existing C zoning .*
 - On Crowley Lake Drive a number of parcels were redesignated to retain their existing C zoning. These owners believed that the commercial designation better reflected current uses.

2. **Areas designated LLR redesignated ER with 10 acre minimum parcel sizes.**
 - These changes in land use designations are part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 79 McGee Creek Area (Figure 37 in the 1993 General Plan)

1. **Areas designated LR redesignated SFR 1 (1 acre minimum lot size - area without water and sewer).**
Areas designated HR redesignated MFR-H.
 - These changes in land use designations are part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 80 McGee Creek Community (New figure not included in the 1993 General Plan)

Detail map of a portion of Figure 79. See comments for Figure 79.

Figure 81 Hilton Creek (Figure 38 in the 1993 General Plan)

1. Mobilehome parks redesignated C from HR.
2. Lakeridge Ranch property redesignated from LR to SP - Specific Plans are required for any subdivision of over 50 lots.
3. Four 1.5+ acre parcels north of Crowley Lake Drive and Contel redesignated ER 1.5. This reflects the existing zoning for the parcels. Owners of three adjacent parcels have also requested to be included as part of the ER use, but without the larger minimum lot size.
4. Two lots south of Pearson Road redesignated PF to reflect existing and proposed uses (proposed Community Center and existing church).
5. On Crowley Lake Drive near Hilton Creek Place and Hilton Creek Drive a number of parcels were redesignated to retain their existing C zoning.
6. Two lots north of Elderberry Lane redesignated SFR from MR as a map correction to reflect a previously adopted subdivision and accompanying rezoning (overlooked in the 1993 General Plan).
7. Areas designated LR redesignated SFR with existing 15,000 sq. ft. minimum lot size.
Mountain Meadows area designated HR redesignated MFR-M.
 - These changes in land use designations are part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 82 Pinon Drive (New figure not included in the 1993 General Plan)

Detail map of a portion of Figure 81.

1. *An area along the western edge of Hilton Creek is redesignated to Estate Residential (ER) from Low Residential (LR).*
 - A number of property owners wished to maintain the larger existing parcel size of the area. The ER designation does this and has a one acre minimum parcel size. The larger lot size is consistent with area policies: "Maintain the quality and livability of the community areas;" and "Preserve and enhance existing single family residential uses" (1993 General Plan, Land Use Element, Long Valley policies, Objective B, Policy 1).
2. **Areas designated LR 15,000 redesignated SFR 15,000.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 83 Hilton Creek Drive (New figure not included in the 1993 General Plan)

Detail map of a portion of Figure 81.

1. ***Extend the Equestrian Combining District to two lots (APN 60-180-01 & 09).***
 - The owners of these two parcels have requested that the equestrian designation be extended to include their parcels which are adjacent to the present district. Lots greater than one acre are permitted to keep large animals.
2. ***A number of parcels were redesignated to retain their existing C zoning .***
 - On Crowley Lake Drive a number of parcels were redesignated to retain their existing C zoning. These owners believed that the commercial designation better reflected current uses.
3. ***An Inyo National Forest (INF) summer home tract has been designated Single Family Residential (SFR/INF) .***
 - The designation reflects existing land uses on the properties.
 - Some of these lands have been identified for potential disposal by the INF.
4. ***Areas designated LR 15,000 redesignated SFR 15,000.***
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 84 Shackford Drive (New figure not included in the 1993 General Plan)

Detail map of a portion of Figure 81.

1. ***Two parcels were designated PF.***
 - The designation reflects the existing use of the parcels; a well site and water storage.
2. ***A number of parcels were redesignated to retain their existing C zoning .***
 - On Crowley Lake Drive a number of parcels were redesignated to retain their existing C zoning. These owners believed that the commercial designation better reflected current uses.
3. ***Areas designated HR redesignated MFR-M.***
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
4. ***Areas designated LR redesignated SFR. Minimum lot sizes are reflective of those established in the general plan.***
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
5. ***Equestrian Combining Overlay.***
 - Reflects the present parcels with the equestrian overlay.

Figure 85 Juniper Drive (New figure not included in the 1993 General Plan)

Detail map of a portion of Figure 81.

1. ***An area along the western edge of Hilton Creek has been redesignated Estate Residential (ER) from Low Residential (LR).***
 - A number of property owners wished to maintain the larger existing parcel size of the area. The ER designation does this and has a one acre minimum parcel size. The larger lot size is consistent with area policies.
2. ***Four 1.5+ acre parcels north of Crowley Lake Drive and Contel redesignated ER 1.5.***
 - *This reflects the existing zoning for the four parcels established at the time of the subdivision. An owner of an adjacent parcel to the north has also requested to be included as part of the ER designation.*
3. ***Areas designated LR 15,000 redesignated SFR 15,000.***

- This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.*

Figure 86 Pearson Road (New figure not included in the 1993 General Plan)

Detail map of a portion of Figure 81.

- 1. Areas designated HR redesignated C.**
 - Property owners wanted the greater flexibility of the commercial designation.
- 2. A number of parcels were redesignated to retain their existing C zoning .**
 - On Crowley Lake Drive a number of parcels were redesignated to retain their existing C zoning. These owners believed that the commercial designation better reflected current uses.
- 3. The two lots south of Pearson Road redesignated PF .**
 - Reflects existing and proposed uses (proposed Community Center and existing church).
- 4. The area east of the County Shop has been redesignated SFR 15,000 .**
 - The redesignation is a map correction to reflect the Rocking R subdivision and accompanying rezoning .
- 5. Areas designated LR redesignated SFR. Minimum lot sizes are reflective of those established in the general plan.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 87 Sierra Springs Drive (New figure not included in the 1993 General Plan)

Detail map of a portion of Figure 81.

- 1. A number of parcels were designated OS .**
 - This designation reflects the existing OS designation of the parcels established at the time of the Rocking R and Sierra Springs subdivisions.
- 2. Areas designated LR 15,000 redesignated SFR 15,000.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 88 Little Round Valley (Figure 39 in the 1993 General Plan)

- 1. Rainbow Tarns redesignated AG from ER.**
 - Review of the land use designations showed that an Agricultural designation better reflected the present use of the property. Section 19.05.030 F of the Mono County Code provides for bed and breakfast uses subject to a use permit in the AG designation.
 - An existing use permit has been approved for the site.
- 2. Redesignation of land used designations. Minimum lot sizes established to reflect existing minimum parcel sizes per current subdivision/zoning, and community input. Areas designated LR redesignated SFR 1/2. Areas designated LLR redesignated RR.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 89 Sunny Slope (Figure 40 in the 1993 General Plan)

- 1. 40 acre ER parcel to the northeast of Sunny Slope designated with a 5 acre minimum parcel density/one unit per 5 acres.**

2. **Area designated SFR has been redesignated SFR 1/2. The 1/2 acre minimum lot size reflects the smallest size lot which permits individual septic systems with a community water system.**
 - “Future development should coincide with infrastructure and service capability and expansion” (1993 General Plan, Land Use Element, Long Valley Policies, Objective A, Policy 1).
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
 - The 1/2 acre minimum lot size is based on the lack of a community sewer system.
3. **An area adjacent the community of Sunny Slopes has been identified for a future fire station.**
 - “Future development should coincide with infrastructure and service capability and expansion” (1993 General Plan, Land Use Element, Long Valley Policies, Objective A, Policy 1).
 - The fire station site has been designated as Public Facility (PF).
4. **Two Inyo National Forest (INF) areas have been designated Single Family Residential (SFR/INF) and Commercial (C/INF).**
 - These designations reflect present land uses on the properties.
 - Some of these lands have been identified for potential disposal by the INF.

Figure 90 Sunny Slope Community (New figure not included in the 1993 General Plan)
Detail map of a portion of Figure 89. See Comment 2 for Figure 89.

Figure 91 Wheeler Crest Area (Figure 41 in the 1993 General Plan)

1. **40 acres exchanged from BLM to private ownership has been redesignated RM.**
2. **Private land sold to DFG has been redesignated RM/State.**
3. **Areas designated ER are redesignated as ER 2. The 2 acre minimum lot sizes reflects the minimum lot size established by the Wheeler Crest Land Use policies.** □ “... Overall densities for areas outside existing developed areas shall not exceed one unit per two acres ...” (1993 General Plan, Land Use Element, Wheeler Crest Policies, Objective A, Policy 1, Action 1.1).
4. **The Wilson property has been redesignated SP/ER in accordance with the adopted General Plan Amendment. The amendment provided for a one unit per two gross acre density.**

Figure 92 Hill Top/Pinon Ranch (New figure not included in the 1993 General Plan)
Detail map of a portion of Figure 91. See Comments 2, 3, and 4 for Figure 91.

Figure 93 Hill Top Estates (New figure not included in the 1993 General Plan)
Detail map of a portion of Figure 91. No changes in designations required.

Figure 94 Paradise (Figure 42 in the 1993 General Plan)

1. **Areas designated LR redesignated SFR.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 95 Paradise Transfer (Figure 42a in the 1995 General Plan Amendment)
No changes required.

Figure 96 Chalfant Valley Area (Figure 43 in the 1993 General Plan)

1. **Area north of Chalfant designated LLR 40 redesignated RMH 40, RMH 4, AG 40, and AG 120.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
 - A portion of the RMH 40 parcel has been reviewed by the Planning Commission for a 4 acre minimum parcel size.
2. **Map corrected to reflect an additional private parcel as Agricultural (AG) rather than Open Space (OS).**
3. **Areas within Chalfant designated ER redesignated RMH.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 97 Chalfant Community/North (Figure 44 in the 1993 General Plan)

1. **Areas within Chalfant designated ER redesignated RMH.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
2. **This map reflects adopted General Plan Amendments (GPA).** GPA 96-02 redesignated Agricultural (AG) land on the west side of Highway to ER, and a GPA adopted in 1995 designated the landfill site as Public Facility (PF).

Figure 98 Chalfant Community/South (Figure 45 in the 1993 General Plan)

1. **Areas designated SP were redesignated AG 40.**
 - The SP designation has been replaced with an Agricultural designation, since there have been no applications for specific plans. A specific plan designation can still be pursued for a development proposal.
2. **The White Mountain Estates area designated ER has been redesignated RMH.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 99 Millner Fan Area (New figure not included in the 1993 General Plan)

1. **This map was prepared to show an existing resource extraction site.**
 - Part of the county effort to designate existing resource extraction sites as Resource Extraction (RE).
 - The General Plan states "Amend the County Zoning and Development Code to provide for a Resource Extraction (RE) District. The Resource Extraction District shall provide appropriate regulations with respect to mineral resource development;" and "Mineral resource development activities may be permitted only in those areas designated for Resource management and zoned Resource Extraction. Extraction of saleable materials/aggregates (e.g. sand or gravel) may also be permitted in areas designated Agriculture and zoned Resource Extraction" (1993 General Plan, Conservation/Open Space Element, Objective C, Actions 2.1 and 2.2).

Figure 100 Hammil Valley/South (Figure 49 in the 1993 General Plan)

1. All parcels designated AG unless previously rezoned or requested by owner to be RR. The minimum lot size for either AG or RR is 10 acres. All parcels have been shown with assigned development credits.

Figure 101 Hammil Valley/Central (Figure 48 in the 1993 General Plan)

1. All parcels designated AG unless previously rezoned or requested by owner to be RR. The minimum lot size for either AG or RR is 10 acres. All parcels have been shown with assigned development credits.

Figure 102 Hammil Valley (Figure 47 in the 1993 General Plan)

1. All parcels designated AG unless previously rezoned or requested by owner to be RR. The minimum lot size for either AG or RR is 10 acres. All parcels have been shown with assigned development credits.

Figure 103 Hammil Valley Area/North (Figure 46 in the 1993 General Plan)

1. All parcels designated AG unless previously rezoned or requested by owner to be RR. The minimum lot size for either AG or RR is 10 acres. All parcels have been shown with assigned development credits.

Figure 104 Benton Valley Area (Figure 50 in the 1993 General Plan)

1. *Much of the area designated as ER has been redesignated AG.*
 - Property owners and the community have requested that existing and potential agricultural use be recognized. Such a change is consistent with the goals and policies of the General Plan.
 - The stated goal for the Tri Valley is “Preserve the rural and agricultural character of the Tri-Valley area” (1993 General Plan, Land Use Element, Tri Valley Policies).
 - A significant portion of the area shown outside of the Benton Community as ER has been redesignated AG.
2. *Designate the wrecking yard as Industrial with a 40 acre minimum lot size (I 40).*
 - The industrial designation is intended to reflect the present use of the parcel and the approved use permit. Further expansion is subject to approval of a new use permit.
 - “Accommodate small industrial development compatible with the existing communities of Benton and Chalfant in order to establish a local employment center and economic base.” (1993 General Plan, Land Use Element, Tri Valley Policies, Objective D, Policy 1).
3. **Areas designated ER have been redesignated RR. Larger minimum lot sizes reflect the parcel size established by existing subdivision and zoning.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 105 Benton Community (Figure 51 in the 1993 General Plan)

1. *Expanded commercial parcels.*
 - A number of additional parcels have been designated as Commercial (C). Most of these changes reflect the existing commercial use of the property and community input.
 - “Provide adequate commercial facilities to serve visitors and residents in the Tri Valley” (1993 General Plan, Land Use Element, Tri Valley Policies, Objective C).
 - “Designate adequate lands along Hwy 6 and 120 in Benton and Chalfant for small-scale commercial uses which serve the communities.” (1993 General Plan, Land Use Element, Tri Valley Policies, Objective C, Policy 1).
2. *Much of the area designated as ER has been redesignated AG.*
 - Property owners and the community have requested that existing and potential agricultural use be recognized. Such a change is consistent with the goals and policies of the General Plan.

- The stated goal for the Tri Valley is “Preserve the rural and agricultural character of the Tri-Valley area” (1993 General Plan, Land Use Element, Tri Valley Policies).
3. ***Designate the wrecking yard as Industrial with a 40 acre minimum lot size (I 40).***•
The industrial designation is intended to reflect the present use of the parcel and the approved use permit. Further expansion is subject to approval of a new use permit.
 - “Accommodate small industrial development compatible with the existing communities of Benton and Chalfant in order to establish a local employment center and economic base.” (1993 General Plan, Land Use Element, Tri Valley Policies, Objective D, Policy 1).
 4. ***The map has been corrected to show all of the school property as Public Facility (PF), and to show the correct location of the Fire Station.***
 5. **Areas designated ER have been redesignated RR. Larger minimum lot sizes reflect the parcel size established by existing subdivision and zoning.**
 - This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.

Figure 106 Benton Townsite (New figure not included in the 1993 General Plan)
Detail map of a portion of Figure 105. See Comments 1, 4, and 5 for Figure 105.

Figure 107 Benton Hot Springs (Figure 52 in the 1993 General Plan)

1. **Areas designated LLR have been redesignated RR. Minimum lot sizes reflect existing zoning and minimum parcel sizes established by the General Plan.**•
This change in land use designations is part of the General Plan and Zoning Code integration, producing consistency with the establishment of a single set of land use designations.
2. **The Benton Paiute Reservation land has been identified.**

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APPENDIX C--NOTICE OF PREPARATION