

December 8, 2015

Regular Meeting

Supervisor Stump

Supplement to Board

Report

DATE: November 20, 2015

TO: Affected local agencies, tribes, state and federal land management agencies, public water suppliers, and other potentially interested stakeholder parties

FROM: Inyo County Water Department and Tri Valley Groundwater Management District

SUBJECT: Input solicited concerning modifications to the boundaries of the Owens Valley Groundwater Basin.

Notification/invitation

The Inyo County Water Department and Tri-Valley Groundwater Management District staff will hold a meeting **December 9, 2015, 6:00 PM** at the Bishop City Council Chambers, 301 West Line Street, Bishop, California to provide a public forum to share information and receive public comment on a possible redrawing of the mapped boundary of the Owens Valley Groundwater Basin (as delineated in California Department of Water Resources Bulletin 118, Basin 6-12). For further information on the meeting, contact Laura Piper at (760) 878-0001, lpiper@inyocounty.us; for further information on the proposed boundary modification, contact Bob Harrington at (760) 878-0001, bharrington@inyocounty.us; or Brent Calloway at (760) 924-1809, bcalloway@mono.ca.gov.

Background

Groundwater basin boundaries throughout California are established based on the extent of alluvial aquifers, and are described in a publication of the Department of Water Resources (DWR) called Bulletin 118. Recently the boundaries of basins described in Bulletin 118 have taken on greater significance with the passage of the Sustainable Groundwater Management Act of 2014 (SGMA). SGMA makes certain basins subject to new groundwater regulations based on priorities assigned to the basins by DWR (e.g., very low priority, low priority, medium priority, or high priority). These priorities, in turn, are determined using a number of factors including amount of groundwater extraction, number of wells, overlying use, etc.

The Owens Valley Groundwater Basin delineated in Bulletin 118 encompasses large areas within both Inyo and Mono Counties, and has been identified by DWR as a medium priority basin making it one of the basins subject to regulation under the SGMA.

However, SGMA provides that local entities may seek modifications to the groundwater basin boundaries set forth in Bulletin 118 based on either hydrologic or jurisdictional justifications. The California Water Commission has adopted regulations laying out a framework by which local agencies may request these revisions. DWR will accept requests from local agencies for boundary revisions for at least 90 days following January 1, 2016. In 2017, DWR will publish an interim update to Bulletin 118 with any boundary revisions approved by DWR. Basins will then be re-prioritized by DWR based on the revised boundaries.

In the interest of managing groundwater on a sound hydrogeologic basis with a minimum of jurisdictional obstacles, Inyo County and the Tri Valley Groundwater Management District are considering seeking a revision to the boundaries of the Owens Valley Groundwater Basin that would divide the existing basin into two subbasins, one comprising Benton, Hammil, and Chalfant Valleys (the Tri-Valley Subbasin), and one comprising the Owens Valley (the Owens Valley subbasin). The boundary between the two subbasins is proposed to correspond to the Inyo-Mono County line between Chalfant Valley and Laws (see attached map). The purpose of the meeting on December 9, 2015 will be for Inyo County Water Department and Tri Valley Groundwater Management District staff to share information concerning a possible groundwater basin boundary modification and for the public to comment on groundwater basin boundary revisions. Subsequent to the December 9 meeting, the Inyo County Board of Supervisors and the Tri-Valley Groundwater Management District Board will consider whether to submit the proposed boundary modification to the California Department of Water Resources.

Additional Information about the Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) gives local agencies the authority (and in some cases the obligation) to manage groundwater in a sustainable manner. SGMA defines sustainable groundwater management as management and use of groundwater that can be maintained without causing undesirable results, where “undesirable results” means any of the following:

- Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply;
- Significant and unreasonable reduction of groundwater storage;
- Significant and unreasonable seawater intrusion;
- Significant and unreasonable degraded water quality;
- Significant and unreasonable land subsidence;
- Depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of surface water.

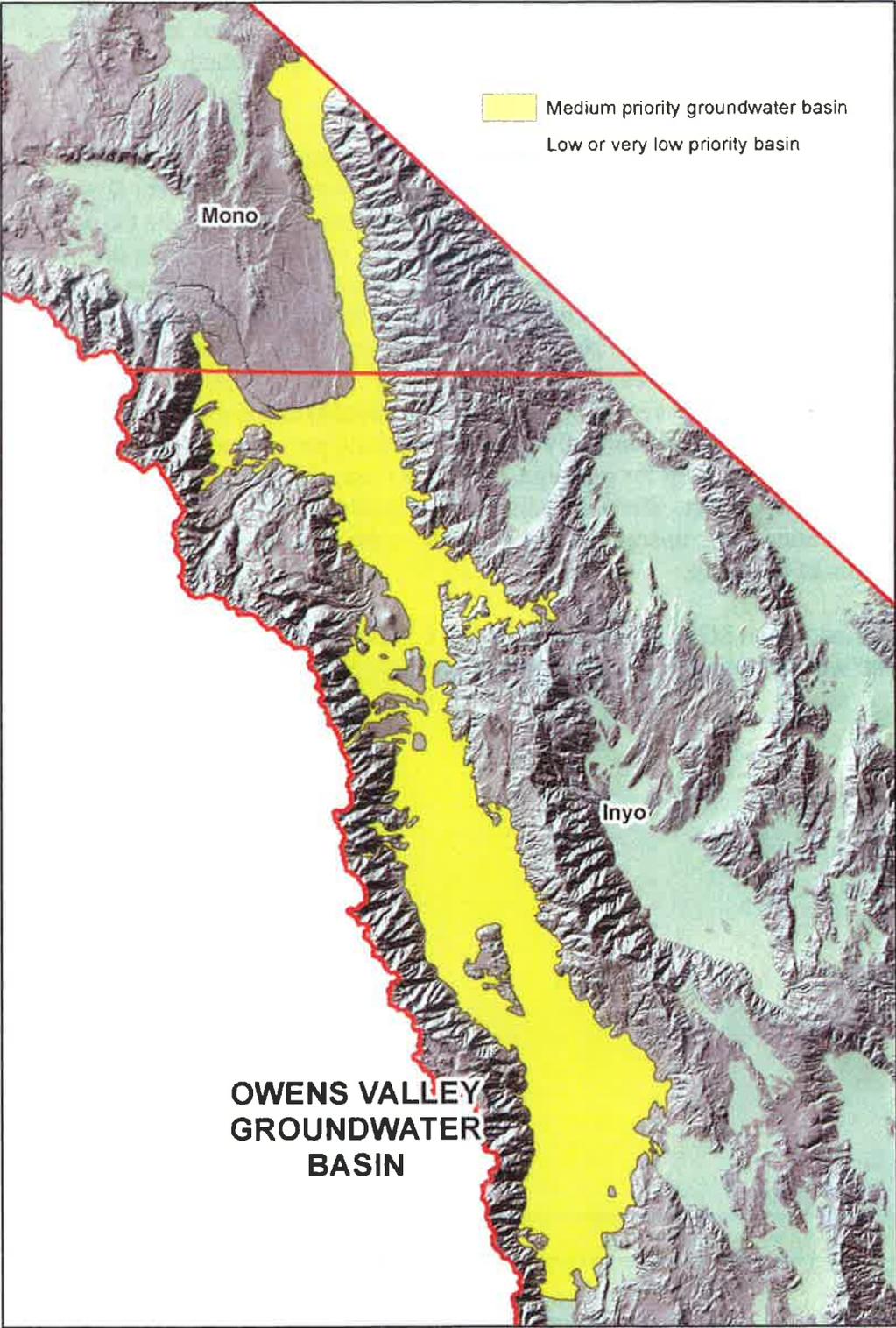
Under SGMA, a Groundwater Sustainability Agency (GSA) must be formed for all medium and high priority basins by June 30, 2017. Entities eligible to act as a GSA are local public agencies with water supply, water management, or land use responsibilities. GSAs are responsible for developing and implementing Groundwater Sustainability Plans (GSPs) by June 31, 2020 in basins identified as subject to critical conditions of overdraft, and by January 31, 2022 in all other medium and high priority basins. GSPs should provide management that will achieve sustainability by twenty years following adoption of the GSP.

SGMA provides a number of institutional arrangements by which local agencies can form GSAs, with the goal that each medium and high priority basin will be entirely covered by a GSP or multiple GSPs implemented by a GSA or multiple GSAs. Where no other eligible local entity exists, SGMA places responsibility for establishing GSAs and GSPs on counties. If local entities do not form and implement GSAs and/or GSPs, SGMA requires that the State Water Resources Control Board step in and impose an interim GSP at the expense of eligible local entities. Since

groundwater basins are the targeted management unit, the definition of groundwater basin boundaries affects how GSAs and GSPs will be formed and how basins are prioritized. Of particular importance to counties is the correspondence between groundwater basin and subbasin boundaries and county boundaries.

SGMA has certain jurisdictional provisions specific to Owens Valley. In the Mono County portion of the basin, the Mono County Tri Valley Groundwater Management District is deemed the exclusive local agency within its boundaries, and therefore would be the GSA for the Mono County portion of the basin unless the District decides to forego that role. In the Inyo County portion of the basin, SGMA provides that “*Any groundwater basin or portion of a groundwater basin in Inyo County managed pursuant to the terms of the stipulated judgement in City of Los Angeles v. Board of Supervisors of the County of Inyo, et al. (Inyo County Case No. 12908) shall be treated as an adjudicated area pursuant to [SGMA]*” (CWC 10720.8 (c)). Although SGMA does not require adjudicated areas to form GSAs and develop and implement GSPs, the parties to the adjudication are required to annually report to the State groundwater elevations, groundwater extraction, surface water used for recharge, total water use, change in groundwater storage, and annual report(s) to the court. Since the adjudication applies only to a portion of Owens Valley, GSA formation and GSP preparation are applicable to the non-adjudicated lands in the Inyo County portion of the basin.

Further information on SGMA is available on the California Department of Water Resources groundwater website: <http://www.water.ca.gov/groundwater/>



December 8, 2015

Regular Meeting

Item #9b

Community

Development

General Plan

Amendment 15-002

TROD App in

June Lake

Jeff Ronci

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Date: November 25, 2015

Mono County Supervisors
TROD's in The Clark Tract

Mono County Supervisors:

Let me start by stating that I am pro growth and recognize the need for economic stability in June Lake, a community struggling to find its place in the tourism market. For years the community has enjoyed a strong summer economy only to have all the hard work vanish in the winter months. Local lodging establishments have regularly used their summer revenues to keep the doors open during the winter months. This practice often impacts the ability to perform much needed maintenance and renovations in order to stay competitive in an ever-changing tourism market.

Mono County's position of allowing for TROD's in Single Family Residential areas of June Lake Specifically The Clark Tract is in my opinion a mistake. For years as a local lodging owner and operator we have had multiple issues with tourists who rent vacation homes in June Lake. The traveling public expects certain amenities when visiting the area and not all of these homes are equipped to accommodate them. For example refuse. Often trash from these renters finds its way into my dumpsters. I have also on numerous occasions been forced to ask people to leave my Jacuzzi hot tub because they are not guests but are renting a house nearby and the owner told them to use our facility. Then there is parking and access. In winter months this is a real problem. At one time we as a business were forced to issue parking permits at check in so as to identify our guests and police the use of our parking facilities.

It was made public years ago that June Lake did not have enough beds for the local Ski Resort to move forward with their expansion plans thus creating a strong winter economy to go with our already strong summer economy. The need for beds in June Lake is a tough topic. Throughout the summer months the local lodging establishments are often sold out. At Whispering Pines we have achieved occupancy of over 90% for the months of June, July and August. 70% for the months of May, September and October. The months of November, December, January, February, March and April are a different story. If it snows we can expect on a 38% occupancy at best. If it doesn't snow those figures drop into the single digits. So it's not a question of beds in June Lake, it's a question of the right kind of beds in June Lake. The Ski Resort wants all inclusive resort style accommodations. Most if not all of the lodging establishments in June Lake are limited service facilities. The homes applying for a permit are what I would consider no service facilities.

In closing I would just like to remind everyone that many hours and much effort was put into the zoning in June Lake. This was done for a reason and didn't happen overnight. Single Family Residential, Mixed Use, Commercial Lodging Moderate, and Commercial Lodging High mean something. If you want to own and operate a motel then purchase one or build one.

Sincerely,

Jeff Ronci
General Manager / Owner
Whispering Pines

December 8, 2015

Regular Meeting

Item #13b

Community

Development

**2015 Mono County Regional
Transportation Plan, General
Plan, Countywide Integrated
Waste Management Plan, and
Noise Ordinance Updates, and
Final EIR**

2015 County of Mono

***Regional Transportation Plan, General Plan,
Countywide Integrated Waste Management
Plan, and Noise Ordinance Updates; and Repeal of the***

Conway Ranch Specific Plan

(2015 Updates and Repeal of the Conway Ranch Specific Plan)

FINAL EIR

**Board of Supervisors
Presentation**

8 December 2015

PROJECT INITIATION & NOP

- CEQA review for MONO GP/RTP began in summer of 2013
- Notice of EIR Preparation Work was issued on 6 June 2014
- Scoping Meeting was held on 19 June 2014, attended by CDFW and MCMWTC
- NOP comment period ended on 11 July 2014
 - 3 comment letters received: LRWQCB, Department of Parks and Recreation, Caltrans
 - Each comment letter offered information that was used to shape the scope and content of the EIR analysis

DRAFT EIR REVIEW

- o The Draft EIR and supporting materials were released for a 60-day public review that began on 30 July 2015.
- o The DEIR Public Review period ended on 29 September 2015.
- o By the close of the public review period, the county had received 14 comment letters. Seven of the comment letters focused exclusively on the GP/RTP updates. Seven letters offered comments and questions concerning the EIR including comments from GBUAPCD, CDFW, Caltrans, LRWQCB and Mono Lake Committee.
- o Two additional comment letters (from JLPUD & USFWS) were received after close of the comment period. The County was able to include these late comments, along with responses, in the FEIR.

COMMENTS ON DEIR

- o DEIR Comments were helpful & very constructive
- o Comments on the EIR are briefly profiled below:
 - o **GBUAPCD:**
 - o Clarifications on proposed AQMP revisions addressing PM₁₀ attainment
 - o Clarifications concerning motor vehicle emission budgets
 - o **CDFW (3 letters):**
 - o Clarifications re: mule deer overwintering areas & hunting, sage grouse habitat & movement patterns in Mono Co., and presence of pygmy rabbit in Long Valley
 - o Notes that CDFW has no plans to reintroduce Lahontan cutthroat trout to Witcher/Birch Creeks
 - o Concerned that reintroduction of domestic sheep grazing in Mono Basin would jeopardize recovery of federally endangered Sierra Nev. Bighorn Sheep
 - o **Caltrans:**
 - o Offered information, suggestions and clarifications on a wide range of RTP/ transportation topics including airport safety, scenic highways and roadways, truck traffic, maintenance facilities and other topics

DEIR COMMENTS con't

o Lahontan RWQCB:

- o Acknowledged County efforts in establishing a Low Impact Development Ord. & incorporating findings of local/regional watershed management plans
- o Emphasized groundwater protection as a countywide issue that should ideally be addressed in all GP elements
- o Urged Mono County to incentivize community wastewater treatment systems
- o Clarified LRWQCB permit requirements.

o Mono Lake Committee:

- o Suggested ways to eradicate invasive species, protect cyclists and wildlife adjacent to traffic
- o Clarified details regarding Mono Lake water levels and dust sources
- o Requested information and offered clarifications on a wide range of topics:
 - o mining activities
 - o soils and public hazards
 - o cultural resources
 - o hydrologic facilities & processes
 - o water conservation, water rights
 - o intrinsic qualities of Lee Vining
- o Expressed support for the compact development and proactive policy alternatives following RPAC input

LATE COMMENTS

o **June Lake Public Utilities District:** wrote to confirm statements in their earlier letter concerning adequacy of their water supply to serve planned growth.

o **USFWS:**

- o Commended Mono County's efforts to facilitate sage-grouse and other species conservation through the General Plan process
- o Encouraged County to protect sage grouse by adopting actions to:
 - o limit ravens' access to carcasses (deer/livestock); and
 - o ensure that cell tower placement not provide ravens with poaching sites
- o Cited potential impacts to sage grouse associated with improvements to SR 270 and Cottonwood Canyon Road
- o Encouraged county to assist private landowner in removing non-native annual grasses
- o Expressed support for the proactive policies alternative
- o Provided updated info on the status of Sierra Red Fox as an ESA candidate species
- o Encouraged County to take additional steps to protect migratory birds
- o Reiterated statements that Witcher & Birch Creeks are outside the native range of Lahontan cutthroat trout & concerns about sheep grazing impacts on Bighorn Sheep

FINAL EIR

- o Responses have been prepared to address each of the comments received (including the late comments)
- o All comments and responses are part of the FEIR before you today.

SIGNIFICANT IMPACTS

The Final EIR identifies a number of potentially significant and unavoidable environmental effects that may be associated with project implementation, including:

o **Biological Resources:**

- o candidate/sensitive/special status species,
- o riparian habitat,
- o wetlands,
- o migration corridors and migrating species, and
- o local biological resource protection ordinances.

o **Soils and Geologic Hazards:**

- o exposure to seismic effects,
- o exposure to unstable geologic structures,
- o soil erosion, and
- o loss of mineral resources.

o **Health and Safety Hazards:**

- o potential for harm resulting from release of hazardous substances,
- o inadequate emergency response, and
- o exposure to wildland fire risks.

o **Recreation:**

- o effect of recreational activities on environmental resources

SIGNIFICANT EFFECTS con't

o Cultural Resources:

- o impacts to prehistoric or historic structures,
- o loss of paleontological resources, and
- o impacts to resources on sacred lands.

o Hydrology, Water Quality and Water Supplies:

- o violation of water quality objectives,
- o violation of waste discharge requirements,
- o lack of adequate water supplies, and
- o erosion and siltation from altered drainages.

o Aesthetic and Visual Resources, Light and Glare:

- o impacts to scenic resources in a state scenic highway,
- o degraded visual character or quality, and
- o new sources of light and glare.

o Public Services and Utilities:

- o impacts on fire protection services, and
- o added demands on utility providers and services.

o No known areas of controversy or unresolved issues

MITIGATION MONITORING PROGRAM

- o During the Draft EIR analysis of potential environmental effects, a number of mitigation recommendations were developed.
- o Additional mitigations were suggested in comments on the Draft EIR
- o The purpose of the recommended mitigation measures was to reduce or avoid environmental effects that were not already addressed by proposed General Plan/RTP goals, objectives, policies and actions.
- o All 40 supplemental mitigations were subsequently incorporated into the GP/RTP Update (as policies & actions), and all are listed in the MMRP. The measures address:
 - o air quality/GHG
 - o biological resources,
 - o geology and soils, and
 - o hydrology and water quality.
- o As a result, there are no formal mitigation measures – all are now part of the project.
- o The incorporation of policies & actions to address environmental effects identified during the CEQA review reflects the essential purpose and intent of CEQA.

ALTERNATIVES

- o In addition to the mandatory 'No Project Alternative,' two alternatives were analyzed and compared to the project as proposed for your consideration. The two alternatives included:
 - o Compact Development Alternative, involving a series of steps that would curtail development outside of established community areas through:
 - o increased minimum acreage requirements for subdivisions, agricultural lands, similar uses;
 - o higher development density allocations within defined community boundaries.
 - o A Proactive Resource and Biological Policy Alternative that presents and describes policies for resource efficiency and biological conservation that were found to have substantial merit.
- o Following analysis of the No Project alternative and the 2 alternatives mentioned, the EIR concluded that:
 - o The No Project Alternative would be least effective at meeting project objectives and least effective at avoiding or reducing significant effects.
 - o Alternatives 2 (compact development) and 3 (proactive bio and resource efficiency policies) would both be environmentally superior to the proposed project. However, neither is recommended at this time because the underlying concepts were not presented to the community RPACs for discussion during draft GP development, and were not among the land use scenarios developed by the RPACs for consideration in the current update.
- o Though not now recommended, this EIR does suggest that the county present the concepts underlying Alternatives 2 & 3 for future discussion among RPAC & community planning groups.
 - o If the discussions indicate that these changes are broadly supported, it is recommended that the County incorporate the revisions in a future General Plan amendment.

CLOSING COMMENTS

- o The Final EIR is now complete and ready for consideration by the Board of Supervisors.
- o This concludes our brief presentation on the CEQA process
- o Questions and Discussion

Mono County Community Development Department

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760.932.5420, fax 932.5431
www.monocounty.ca.gov

To: Honorable Mono County Board of Supervisors

**From: Wendy Sugimura, Associate Analyst
Gerry LeFrancois, Principal Planner**

Date: December 8, 2015

RE: ADDITIONAL CHANGES TO THE REGIONAL TRANSPORTATION PLAN AND ENVIRONMENTAL IMPACT REPORT RESULTING FROM FURTHER DISCUSSIONS WITH CALTRANS DISTRICT 9

In response to the County's response to comments, Caltrans District 9 provided additional information and made further suggested revisions to the Regional Transportation Plan (RTP) and associated Environmental Impact Report (EIR). As a result, the modifications below (in track changes format and/or highlighted in yellow) are recommended to the Board of Supervisors as part of the adoption of the 2015 Updates and Final EIR.

REGIONAL TRANSPORTATION PLAN

- **Page 26-27 (truck traffic data)**

- Increased levels of truck traffic on highways are a perceived safety concern. Highways-US 395 and 6 have been identified as-is an interstate truck routes and experiences heavy truck traffic, and truck traffic on US 6 impacts residential communities. In 2006, medium- and heavy-duty trucks comprised 25% of all traffic within the corridor (this and all further information on truck traffic is from Katz, 2006). Five-axle single- unit trucks made up approximately 80% of all truck traffic. The majority of southbound trucks used US 395 (61%) instead of US 6 (31%). The majority of northbound trucks used US 395 (59%) instead of US 6 (33%). Truck volumes are generally higher in the southbound direction and the average peak period for truck traffic is the midday period between 10 am and 3 pm. Safety concerns focus on the impact of oversized trucks on the safety and capacity of two-lane highway sections and the lack of paved shoulders and adequate sight distances. Narrow shoulders create hazardous conditions if vehicles must pull over for emergencies. Narrow shoulders are also less desirable for bicyclists, especially when being passed by large trucks. The recent four-laning of US 395 in various parts of the county has mitigated safety issues in those areas but concerns about truck traffic remain significant in the Tri-Valley on US 6, a two-lane road with no shoulders.

Based on Caltrans traffic counts, US 6 truck traffic in 2014 ranged from a high of 644 trucks (truck average annual daily traffic (TAADT)), or 30% of the annual average daily traffic (AADT), at Silver Canyon Road (PM3.953 Inyo County) to a low of 207 TAADT, or 23% of AADT, at the Nevada State Line (PM32.29). US 395 truck traffic in 2014 ranged from 578 TAADT, or 12.8% of AADT, at SR 203 (PM 25.75); 1001 TAADT, or 23.2% of AADT at SR 120 (PM50.74); and 384 TAADT, or 10.7% of AADT, at the

- **Page 40 (adaptation to climate change)**

Climate Change

Potential impacts from climate change in the Eastern Sierra include flooding, a substantially reduced snowpack, ~~and~~ related economic impacts due to declines in tourism, and impacts to ecosystems and biodiversity.¹ There is a need to assess potential related effects on the transportation system, to determine whether there are critical assets that should be protected, and then to develop and implement adaptation strategies to address those potential impacts.

Resource-Efficient Transportation System/Greenhouse Gas Reduction

Mono County had developed a Resource Efficiency Plan (REP) in order to identify the most effective and appropriate greenhouse gas (GHG) emissions reduction strategies. The plan includes: 1) a baseline GHG emissions inventory; 2) a GHG emissions forecast and reduction target; 3) policies and programs to achieve the adopted target; and 4) a monitoring program. The REP is incorporated by reference in this RTP; policies and objectives included in the Plan have been included in the policy section of this RTP. Policies addressing issues related to climate adaptation including flooding, reduced snowpack (and water availability), economic issues, and ecosystems and biodiversity, are contained in the Mono County General Plan Land Use Element and Conservation/Open Space Element.

- **Page 87 (adaptation to climate change)**

Objective 9.A.7. Reduce transportation-related hazards such as existing flooding, which may be increased by climate change.

Time frame: Ongoing over the 20-year time frame of this project.

- **Page 181 – Updated Table of SHOPP projects**

<u>Project Name</u>	<u>Route</u>	<u>PM</u>	<u>Construction Cost (\$ in millions, escalated)</u>	<u>Comments/Status</u>
<u>Conway Guardrail</u>	<u>395</u>	<u>60.0/69.9</u>	<u>\$2.6</u>	<u>Remove existing guardrail and install Mid-West Guardrail. District Approval 6/11/15. Program concurrence 7/9/15. Begin environmental 7/1/16.</u>
<u>North Sherwin Shoulders</u>	<u>395</u>	<u>6.8/9.9</u>	<u>\$13.7</u>	<u>Widen shoulders to 10 feet just South of Toms Place. District approval 6/26/15. Waiting for funding</u>

¹ See Addressing Climate change Adaptation in Regional Transportation Plans, pages 80-84, http://www.dot.ca.gov/hq/tpp/offices/orip/climate_change/documents/FR3_CA_Climate_Change_Adaptation_Guide_2013-02-26_.pdf#zoom=65. February 2013.

<u>Lee Vining ADA</u>	<u>395</u>	<u>51.1/51.7</u>	<u>\$1.5</u>	<u>Reconstruct curb ramps, driveway openings, repair damaged and non-compliant sidewalk. District approval 6/11/15. Waiting for funding.</u>
<u>Sheep Ranch Shoulders</u>	<u>395</u>	<u>80.5/84.3</u>	<u>\$4.4</u>	<u>Add 8 foot shoulders and treat 4 rockfall locations. Environmental work completed with construction expected in 2017.</u>
<u>Aspen-Fales Shoulder Widening</u>	<u>395</u>	<u>88.4/91.6</u>	<u>\$5.9</u>	<u>Widen shoulders to 8 feet, install rumble strip, correct superelevation at one horizontal curve. Construction 2018.</u>
<u>McNally Shoulders</u>	<u>6</u>	<u>0.0/0.8, 4.3/8.4</u>	<u>\$3.8</u>	<u>Widen shoulders to 8 feet. District approval 6/26/15. Program concurrence 7/9/15. Begin environmental 7/1/16.</u>
<u>Inyo/Mono Rumble Strips & Signs</u>	<u>var</u>	<u>Various</u>	<u>\$0.4</u>	<u>Install signs and rumble strip at numerous locations in Inyo and Mono County</u>
<u>Green Lakes CAPM</u>	<u>395</u>	<u>69.8/76.0</u>	<u>\$4.0</u>	<u>Rehabilitate pavement. Construction 2016.</u>
<u>Bridgeport Culverts</u>	<u>395</u>	<u>77.0/87.0</u>	<u>\$1.5</u>	<u>Replace or repair 40 (or so) culverts north and south of Bridgeport. Construction in 2016.</u>
<u>Little Walker Shoulders</u>	<u>395</u>	<u>93.4/95.7</u>	<u>\$4.5</u>	<u>Widen shoulders from 2 feet to 8 feet, install rumble strip, correct superelevation of two horizontal curves. Construction 2019. Environmental Studies complete.</u>
<u>Walker CAPM</u>	<u>395</u>	<u>106.3/120.5</u>	<u>\$14.3</u>	<u>Cold in-place recycle pavement strategy from Walker to Nevada.</u>
<u>Inyo/Mono Bridge Transition Rail</u>	<u>var</u>	<u>Various</u>	<u>\$3.7</u>	<u>Upgrade barrier approach rail. Environmental complete Jan 2015, construction 2016.</u>
<u>Lee Vining Rockfall</u>	<u>395</u>	<u>52.1/53.7</u>	<u>\$6.0</u>	<u>Final Environmental Document complete July 2013; Revegetation test plots minor project underway. Construction began May 4. Contractor proposes to complete the project in one construction season. Phase 1 (slopes 1, 2, 5, and 6) is complete. Phase 2 (slopes 3 and 4) will begin as soon as possible in spring 2016.</u>

Italicized font indicates 2016 SHOPP.

- **Throughout**

When referencing Highway 120 through Yosemite National Park, administratively change "SR 120" to "Highway 120" to denote the roadway is not under the jurisdiction of Caltrans within the national park.

ENVIRONMENTAL IMPACT REPORT

- **Page 4.2-9 (Truck Traffic)**

~~"Truck Traffic Volumes. Increased levels of truck traffic on highways are a perceived safety concern. Highways US 395 and 6 have been identified as interstate truck routes and experiences heavy truck traffic, and truck traffic on US 6 impacts residential communities. Whereas medium and heavy-duty trucks comprised 25% of all traffic in the corridor during 2006, with five-axle single unit trucks now comprising approximately 80% of all truck traffic. The majority of southbound trucks use US 395 (61%) instead of US 6 (31%). The majority of northbound trucks use US 395 (59%) instead of US 6 (33%). Truck volumes are generally higher in the southbound direction and the average peak period for truck traffic is the midday period. Concerns focus on the impact of oversized trucks on the safety of two-lane highway sections and the lack of paved shoulders and adequate sight distances. As an example, the LTC is supportive of Caltrans' recent efforts to restrict large trucks from passage over SR 108 due to road constraints. Narrow shoulders create hazardous conditions for bicyclists and vehicles (particularly when vehicles pull over for emergencies). US 395 improvement to four lanes has mitigated safety issues in parts of the county, but concerns about truck traffic remain significant on US 6 (a two-lane road with no shoulders) in the Tri-Valley area.~~

Based on Caltrans traffic counts, US 6 truck traffic in 2014 ranged from a high of 644 trucks (truck average annual daily traffic (TAADT)), or 30% of the annual average daily traffic (AADT), at Silver Canyon Road (PM3.953 Inyo County) to a low of 207 TAADT, or 23% of AADT, at the Nevada State Line (PM32.29). US 395 truck traffic in 2014 ranged from 578 TAADT, or 12.8% of AADT, at SR 203 (PM 25.75); 1001 TAADT, or 23.2% of AADT at SR 120 (PM50.74); and 384 TAADT, or 10.7% of AADT, at the Nevada State Line (PM 120.4). (Source: 2014 Annual Average Daily Truck Traffic on the California State Highway System, Caltrans.)"

- **Page 4.10-3 (scenic highway)**

Figure 4.10-1 in the EIR does not differentiate between scenic highways adopted by the State versus the County. The figure shall be replaced by Figures 5 and 6 in the RTP, which correctly distinguish jurisdictional authority, and the appropriate references shall be incorporated into the accompanying EIR text.