

October 2, 2022

Mono County Community Development Department
Bentley Regehr, CDD Planning Analyst
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**RE: Comment on CEQA INITIAL STUDY NEGATIVE DECLARATION D&S WASTE REMOVAL
MONO WASTE TRANSFER STATION Public Review Draft**

Dear Bentley, Mono CDD, and D&S Waste, and anyone It May Concern:

I have owned a residential property at 508 Cottonwood Canyon Road, 1.03 miles from the proposed transfer station, since 2004.

Thank you for the opportunity to comment on this relatively early document prepared by D&S's consultants and submitted to the County; no doubt this evaluation and approval process will be a long and intricate one. It's clear that large, County-wide forces and infrastructural needs are at play here, what with the approaching scheduled closing of the Benton Crossing landfill, and that these issues go well beyond those that would attend to a private property owner applying to develop their property for personal economic gain. While D&S is a private entity, its contract with the County makes it -- and the situation of the expanded waste facility in the North Mono Basin, more like a public utility.

Reading these long and detailed documents, it's clear that I as a private citizen do not have the professional or legal expertise to definitively say whether this project should have a CEQA NEGATIVE DECLARATION, A MITIGATED NEGATIVE DECLARATION, or require a full ENVIRONMENTAL IMPACT REPORT (EIR), but I can say that the present documents arguing for a Negative Declaration, not surprisingly all work in an expectedly biased way towards describing the expansion of the property's current use, for example on **Page 123**, as something that ***“does not have the potential to significantly impact the environment or human beings, either directly or indirectly”*** – an assertion which is clearly false. This project has many real impacts to the environment, and to the many humans which make their homes in the immediate vicinity.

It's true that the property is currently being used, and has been used for some time, in a way that establishes a baseline of daily trash trucking activity on Highway 167 and that points to incremental industrial expansion of an existing use – not one wrested from absolutely pristine landscape.

It's also true that D&S has thoughtfully responded to concerns of preserving the scenic view by proposing natively-landscaped berms on the West, South and East of the property. This is a much-appreciated and the best possible solution towards preserving the untrammled and unparalleled wide-open visual feel of the North Mono Basin. Highway 167 is one of the most

iconic drives in modern California, and key to its uniqueness is absence of perceived habitation and alteration.

Psychologically and visually, the North Basin offers what might be called “The Big Empty,” or a sense of “Deep Space,” but in actuality -- and contrary to the assertions of D&S’s documents at hand – it’s anything **but** empty. There **IS** a community that lives here, comprised of people that have deliberately chosen, at some cost and difficulty, to make a stand out in a sublime and vast spot, where cows (now back in the Basin with Hunewill’s acquisition of Flying M Ranch) outnumber people. But there **are** people! No, it’s not Mono City or Lee Vining, but we do exist. We are here in the North Basin, and we treasure the peace of the natural surroundings, and work to live lightly amidst them. We do not wish to be effectively erased, as Mono County considers how to best solve its solid waste problems and moves towards a fairly significant increase in the industrialization of the North Mono Basin.

Page 29 of the initial document asserts that “Only one residential/commercial property [Rea] is affected” by the expansion of use. **Page 40** states that “The closest residential community is Mono City, approximately 8 miles to the West.” Both these statements are patently false. The Rea property is only the nearest one to the project, but the larger residential community in the area begins only a half mile more to the West, and just less than a mile to the East. It’s comprised of no less than twenty residences, eighteen of which are within 2.5 miles of the site, see list below.

Here below are the residential household distances to D&S Waste proposed industrial municipal solid waste transfer facility:

John Rea, 7967 Highway 167:	0.41 miles RM
George Swiggum, 228 Cottonwood Canyon Road:	1.02 miles RR20
Suppa Family, 100 North Bodie Hills Drive:	1.02 miles AG20
Michael Light, 508 Cottonwood Canyon Road:	1.03 miles RR20
Wright/McCoy, 220 North Bodie Hills Drive:	1.04 miles RR20
Dave Williamson, 351 Cottonwood Canyon Road:	1.23 miles AG20
Jim and Kathi Richards, 1046 Cottonwood Canyon Road:	1.25 miles AG20
Jack Cochrane, 192 South Bodie Hills Drive:	1.31 miles RR20
Cole and Priscilla Hawkins, 9500 Highway 167:	1.35 miles RM
Grace Anderson, 376 South Bodie Hills Drive:	1.37 miles RR20
Steve and Sharyn Connett, 593 Cottonwood Canyon Road:	1.38 miles RR20
John and Maryanne Denney, 9515 Highway 167:	1.41 miles RM
David Buuck and Yedda Morrison, 9510 Highway 167:	1.60 miles RM
Tom Crowe, 9772 Highway 167:	1.70 miles RM
Stockwell Family, 6344 Highway 167:	1.78 miles RR20
Glenda Bayless, 1882 Dobie Meadows Road:	2.01 miles RM
Garland Family, 2935 Cottonwood Canyon Road:	2.05 miles ER40
Hansen Estate, 3011 Cottonwood Canyon Road:	2.57 miles ER40
Moore Family, 3645 Dobie Meadows Road:	3.86 miles RM

Owenna Dunstone, 70752 Highway 167:

5.03 miles RM

Aside from pointing out the substantial number of people who have made homes in the area, I want to emphasize that my primary concern about this report is its undue minimization of an issue that will affect every single one of those homeowners: NOISE. Noise travels exceedingly far in this open and exceptionally quiet area of the Mono Basin. We are far from the din of Highway 395, and enjoy the peace. Some of the noise related to the transfer station is unavoidable, like trucks coming and going on Highway 167, and some of that noise is already in place. However, in an area wholly without utility electric power, all power is either lightly generated by solar panels with marginal battery backups, or more serious usage much be generated by diesel or propane generators.

Setting aside the carbon emissions of such power generation, the noise of generators running carries literally for miles in the area and is noticed by all. We are all on primary solar in the area, with auxiliary backup generators. We all know when one or another of the community is running their generator for residential use. There is no hiding, and it's a residential necessity.

I fear profoundly however that the Transfer Station will have commercial/industrial levels of power usage, far beyond residential that can mostly be covered by solar, and thus that it will need to run its generator(s) a great deal, creating substantial and real noise to the larger community. I believe the present document both understates the real noise that would be generated, as well as the need for it to be generated. The situation is radically different than if there were utility power at the site. I urge the County as well as D&S Waste at this early juncture to dive deeply and honestly into this matter of power usage as well as how it is to be created – and come up with a series of noise mitigation measures that, should a diesel generator have to run, would truly muffle sound and disturbance in this open vast Basin – not just boilerplate lip service to County noise minimums and so forth. It's a real issue, and the area is not unpopulated. The best thing would be for the County to run a power line from the Bodie line down to D&S, but barring that, there are real noise mitigation strategies that can and must be employed.

Last but not least is the terrible BEEPING that we all know too well as people living in modern times when any big truck has to go in reverse. If D&S Trucks are going to regularly go in reverse on the property, outside, with beepers on, it will be a true nightmare for the neighborhood and shatter the special nature of the space that brought us here to settle. Hopefully all truck and loader beeping can either be wholly avoided, or only happen in the covered space where the sound will be contained?

Thanks Much for this Early Opportunity to Comment,

Mike Light
508 Cottonwood Canyon Road, Lee Vining, CA 93541