

ENVIRONMENTAL ASSESSMENT

**BLM, Bishop Field Office
351 Pacu Lane, Suite 100
Bishop, CA 93514**

EA Number: DOI-BLM-CAC-070-2013-0025-EA

Lease/Serial/Case File No.: CACA 052688

Proposed Action Title/Type: Mono City Secondary Ingress/Egress Road ROW (Revised, March, 2014)

Location of Proposed Action: Mt. Diablo Base & Meridian, California, T. 2 N., R. 26 E.,
Section 7, S1/2SW1/4NE1/4,
E1/2NW1/4SE1/4,
NE1/4SW1/4SE1/4.

Applicant (if any): County of Mono, Dept. of Public Works

NOTICE: This is a revised environmental assessment based on Mono County's March, 2014 request to change the proposed action based on a revised technical report from Triad/Holmes Associates (March 13, 2014). The following changes have been incorporated into the proposed action: (1) Widen the existing road between the Fire Station and the Mono City well from 12' to 18' to allow for two-way traffic with a turnaround area (hammerhead) next to well; (2) Reduce the number of turnouts between the parallel road and Highway 167 from 7 to 2; (3) Add an additional gate near the well; (4) Install concrete filled bollards around the well and monitoring station; and (5) Reduce estimated project costs from \$75,000-\$100,000 to \$41,800. See Map 3-A.

Background:

In April 2003, the Lundy wildland fire started at the toe-slope of Copper Mountain in the eastern Sierra Nevada. Driven by high westerly winds and burning in mature shrub vegetation, the fire swept eastward crossing Highway 395 stopping near the Conway Ranch subdivision. The fire burned 740 acres and was located north of the Mono City subdivision and within 1/2 mile of the subdivision. Although wind direction did not change during the initial burn, the wind had the potential to change direction and drive the fire south into Mono City (see Map 1).

Due to fire proximity, access to and from the Mono City subdivision (179 lots, about 100 developed) was blocked by emergency response equipment due to concern of fire

movement into the area. Residents used various dirt roads to exit the subdivision. After the fire, fire-fighting personnel and Mono City residents raised concerns that a similar event would prohibit evacuation, there was an inability of emergency vehicles to quickly turn-around within the subdivision, and local fire-fighting personnel/equipment and emergency personnel/vehicles may be deterred from entering the subdivision due to the lack of a secondary access road. Fire chiefs from surrounding communities have taken a position that responding to a mutual aid call to fight a fire in Mono City would put their crews at risk since there is only one improved route into and out of the community.

As a result of the fire and the lack of secondary ingress/egress, the matter was brought to the attention of the BLM, USFS, and Mono County. In response, the USFS permitted construction of a hard surface connector road at the end of the Mono City subdivision (connecting East Mono Lake Drive and Peeler Lake Drive) to aid in the turning around of emergency vehicles. In 2004, the BLM and USFS established a fuel break to provide some defensive space around the community.

The CalTrans mineral material pit (Poleline Pit, MS 117 and 117A) located near and north of the Mono City subdivision was identified as a potential solution to the secondary road issue due to the number of roads within the pit. CalTrans had not used this pit for years and had scheduled the pit for closure in 2012. As part of that closure, all surface disturbances within the pit would be rehabbed.

The pit had numerous interior roads which provided a connection to Highway 167 and the subdivision. Although these roads were not developed for access to the subdivision or as another way for Mono City residents to get to Highway 167, these existing pit roads could provide a potential access route. In 2009, a BLM fire official, staff, and the local volunteer fire department chief reviewed the pit roads, concluding that the eastern most pit road, with improvement, could satisfy the need for secondary access.

The secondary road issue was brought to the attention of the Mono Basin Regional Planning Advisory Committee (RPAC) and a subcommittee was formed to evaluate the issue and propose solutions. The subcommittee made contact with Mono City residents and sent out questionnaires regarding the issue. As a result of these efforts, the RPAC petitioned the Mono County Board of Supervisors to apply for a secondary ingress/egress road on BLM administered public land.

In June 2010, Mono County applied to the BLM for a secondary ingress/egress road right-of-way (ROW). In May 2011, the BLM conducted a public scoping meeting at the Mono City Fire Station to discuss the proposed project and to identify any reasonable alternatives. During this scoping meeting, the public identified three alternatives that utilized some of the pit roads: the Fire Station, Blue Lake, and Goat Ranch alternatives.

As a result of the Mono County road application, the public scoping meeting, and Caltran's need to close and complete the material pit rehab, the BLM and Mono County requested that the pit rehab plan be amended so that the eastern most road would not be rehabbed as part of the pit closure. This was done so that the road could be

considered as a viable alternative for environmental review. Mono County committed to full rehab of the road should this alternative not be selected. CalTrans completed the pit rehab in July 2012. As part of that effort, the eastern most pit road was closed but not rehabbed. This road is considered to be part of the Fire Station alternative.

This document does not address the various methods or plans available to Mono City residents for handling emergency ingress/egress situations which may develop. Such methods or plans are outside the BLM's jurisdiction and are better developed through local community, fire department, and county planning.

Purpose and Need:

Current Situation and Mono County Proposal

When the Mono City subdivision was originally constructed by the developer, it was served by a single paved road (East Mono Lake Drive) which originates off of Highway 167 (Poleline/Hawthorne Highway) near the Highway 395 intersection. There is no secondary improved access road to the subdivision, but three single lane dirt roads do connect the subdivision to the highway or county roads. This lack of improved secondary access limits ingress/egress options available to residents, fire trucks, and ambulances should it be necessary in the event of an emergency. An improved secondary access road would resolve this issue and make for a safer community. The community is surrounded on four sides by public lands (including National Forest System lands) administered by the BLM Bishop Field Office and the Inyo National Forest, so any alternative secondary access would impact public lands (Mono County road application dated 6-4-2010). The 2003 Lundy wildland fire raised the community awareness of this issue to the Mono County Board of Supervisors.

The Mono County Board of Supervisors recognized that the lack of suitable secondary access to the subdivision was a potential safety issue. The Mono County Community Wildfire Protection Plan (CWPP, May 2009) authorized by the Board of Supervisors calls for a secondary access road for Mono City. Within the plan, Mono City has a community hazard rating of moderate (rating range-low to extreme) which is near the bottom of the rating system. The Board of Supervisors directed the county public works department to propose a remedy to this issue.

In response, the Mono County Public Works Department contracted with Triad/Holmes Engineering for a proposed access road technical report and subsequently filed a road ROW application with the BLM on June 4, 2010 for an existing dirt road located on the east side of the CalTrans mineral material pit (Poleline Pit) as a proposed secondary ingress/egress road for the Mono City subdivision. As proposed, this road would run from the Mono City Fire station to Highway 167 and is the most direct access from the community through public lands to the highway. Triad/Holmes Engineering revised their original report and the revision is now the proposed ROW requested by the County. Road improvement costs are important to the county and proposed road improvement

costs are estimated at \$41,800 per the revised Triad/Holmes technical report dated March 13, 2014.

Purpose and Need for the Proposed Action

The purpose of the proposed action, as defined by Mono County, is to improve public safety by providing a secondary ingress/egress route for the Mono City subdivision that would provide access to the community for emergency response vehicles or for evacuation of the community should the primary access road (East Mono Lake Drive) be blocked. The route should be the most direct route possible, provide for safe travel, use existing roads, minimize disturbance to BLM lands, and be cost effective. Route design should accommodate both ingress/egress traffic and have a compacted stable road surface capable of supporting a 40,000 pound load.

The need for the action is established by the BLM's responsibility under the Federal Land Policy and Management Act of 1976 (FLPMA) to respond to Mono County's application for a right-of-way (ROW) for the construction, operation, maintenance, and termination of a gravel secondary ingress/egress access road across public land.

Decision to be Made

This environmental assessment will be used by the BLM Bishop Field Manager to make a decision as to whether or not to issue a right-of way (ROW) to Mono County for a secondary ingress/egress road across public land for Mono City and if authorized, where the road would be located and what stipulations and mitigation measures would be required.

Public Contact, Comments and Scoping:

Local discussion of a secondary road began shortly after the 2003 Lundy wildfire. The secondary road issue was brought to the attention of the Mono Basin Regional Planning Advisory Committee (RPAC) which took the initiative to gather information and analyze the proposal.

The Mono Basin RPAC held a number of informational sessions regarding the proposed secondary road beginning in May 2009. These discussions took place during scheduled RPAC meetings (agenda item) open to the public. The RPAC set up a subcommittee to handle the secondary road proposal. Surveys or questionnaires were provided to people or sent to Mono City residents on the concept of a secondary road.

In April 2009, a Fire Safe Council meeting was held at the Mono City Fire Hall to discuss preparation for wildfire events. The lack of a secondary access road was identified by fire personnel as a safety issue. Twenty-six (26) people were in attendance.

In August 2009, a Mono City resident/property owner community meeting was held at the Mono City Fire Hall. Fire/emergency personnel from various communities were in attendance. A survey was handed out regarding the secondary road issue. There were 23 responses to the survey with 22 wanting a secondary road, 17 supporting using the eastside pit road for secondary access (Fire Station alternative), and 3 opposing this location. The majority also wanted a minimal impact road, a road gated or closed by signage to control access vs. unrestricted access, and a road that could be plowed in the winter.

In September 2009, Mono County obtained a contracted technical report titled "Mono City Emergency Access Road" from Triad/Homes Associates. This report evaluated and provided engineering recommendations for the route that was identified by Mono County as a secondary access and evacuation route for Mono City. In March, 2014 this report was revised. This revised report provided the basis for Mono County's ROW application to the BLM and is effectively the Fire Station alternative in this document.

In November 2009, the RPAC subcommittee conducted a door-to-door survey that gathered 20 responses. All 20 respondents' wanted a road, although the location was not asked. All supported a road that would result in minimal environmental disturbance. This survey was an attempt to solicit information from people that didn't attend the August meeting or did not comment at that time.

In December 2009, a request for comments was sent out by the RPAC to all Mono City property owners. This request answered some questions and provided an additional opportunity for owners to comment on the proposed route or suggest other alternatives. Four responses were received. Three responses provided alternative routes and one response supported the Fire Station alternative but wanted no roads blocked as mitigation. One response was a letter dated January 2, 2010, which provided numerous reasons against the Fire Station alternative, asked a number of questions, and suggested three other alternatives (see the discussion below on letters received by the BLM).

In April 2011, the RPAC subcommittee provided a petition signed by 49 individuals which requested that the BLM and Mono County act on the ROW application for a secondary ingress/egress access road. The petition stated that the road is essential to protect life and property due to the lack of a secondary road, that existing roads are unmaintained and unmarked, that without secondary access people are at risk of being trapped in the community in the event of fire, and that fire-fighters are at risk if they enter the community with equipment and have no secondary exit.

On May 10, 2011, the BLM conducted a public scoping meeting in order to provide information, answer questions, and obtain comments, concerns and identify issues related to the Mono County road ROW application for a proposed secondary ingress/egress access road for Mono City. A "Notice of Public Scoping Meeting for Mono City Emergency Road" was published in the Mammoth Times on April 29, May 6, and May 13, 2011, and was published in the Inyo Register on April 28 and April 30,

2011. The Notice was also sent to all Mono City private property owners of record. There were 25 people at the meeting, including agency personnel. Appendix A includes a summary of the issues raised at that meeting.

At the time of the public scoping meeting, three routes were being considered by the BLM: the Fire Station (Mono County ROW application), East Side, and Cemetery alternatives. At the meeting, participants identified two additional routes for consideration. CalTrans, at the meeting and by letter, suggested a route (Goat Ranch Alternative) that would begin opposite the existing intersection of Goat Ranch Road and Highway 167 and then make its way to Mono City through the material pit. The other alternative that was suggested would begin at the intersection of Peeler Road and East Mono Lake Drive (Blue Lake Alternative). This route would use the parallel road to get to the material pit and then to Highway 167. All five action alternatives are considered in this environmental review and are described in Section A (see Map 2 and Map 3).

Meeting participants also listed the parameters that should be considered for the proposed alternatives. These were minimize vegetation/habitat loss, reduce risk, minimize gates, minimize length, minimize cost, minimize escape travel time, reduce congestion, construct for the intended use, be a safe route, allow for visibility, allow for the fastest emergency response from surrounding communities, and provide the best evacuation point.

Additional comments were directed towards the potential gating of the road, such as gates could be a hazard during evacuation, gates could be a maintenance problem, gates could be defeated by driving around, gates could cause vehicle damage if crashed, and if not gated there could be unsupervised vehicle use on the secondary access road.

There was concern that all existing dirt road access along the north subdivision boundary, regardless of alternative, be maintained. A couple of residents stated that regardless of what happened, they would drive out the cemetery road if needed.

Another concern was potential impacts to property owners near the proposed access road's point of entry to the subdivision. This was primarily directed at the Fire Station alternative due to the proposed construction of a new road connecting the Fire Station parking lot directly to the parallel road and the existing eastern most material pit road. Commenters pointed out that the new road would encourage increased use through the Fire Station and thereby impact adjacent land owners. It was also mentioned that using the Fire Station as a staging area/entry point may result in confusion and congestion due to evacuating residents and incoming emergency vehicles.

There was a suggestion that a fire history study be conducted in order to help determine the best location for the proposed secondary access road (i.e. furthest from the west side paved road and at the opposite end of Mono City) and that the alternatives be rated based on predicted fire movement (prediction of fire spread and/or direction).

The BLM also received three letters from Mono City residents (and various emails from same) which were located near the Fire Station, citing potential impact to land owners should the Fire Station alternative be chosen. Those concerns were that the process was slanted and a decision for the Fire Station alternative had already been reached by the BLM, that any attempt to contact or register resident support or lack thereof was flawed, that use of the Fire Station would contribute to confusion and congestion during an emergency, that the only sensible alternative was the East Side or Cemetery alternative due to greatest distance from the west side paved road near Highway 395, and that it was unfair that only a certain number of landowners had to bear the burden of being next to the proposed road (i.e. the bluff-side residents wouldn't be impacted by the proposed secondary road). Another comment referenced the timing of the proposal and the proposed access road location, stating that processing the proposed secondary road at this time was premature and that more discussion with residents, fire officials, agencies, and the county should be taking place so that an emergency action plan could be developed for the whole community, whereby, the location of the secondary road could be determined in relation with that plan. The letters also cited some of the same concerns or comments that were also presented at the May 10, 2011 public scoping meeting.

In summary, the majority of people that provided written responses and/or attended the scoping meeting want a secondary access road and, in general, the Fire Station alternative is the preferred location. Out of the 147 lot owners in the community, the majority did not respond to various requests for comments and provided no comments on the proposal. There is clear concern that without a secondary access road, lives and property are at risk as well as fire-fighters and emergency personnel. There are some residents that want a secondary road but not necessarily the Fire Station alternative.

In regards to the suggestion of further emergency planning for the community, this is outside BLM's jurisdiction. Mono City residents have always had the ability to conduct emergency planning activities, as well as discuss how emergency events should be handled in conjunction with local, county and state agencies.

For this proposed project, the BLM is responding to a ROW application filed by Mono County for a secondary ingress/egress road for Mono City. The proposed secondary road has county support and Mono City residents have shown partial support.

Public comments and associated public outreach for this proposed project has been taken into consideration during the development of this environmental assessment. Six alternatives are considered; however, only 3 alternatives are considered in detail. A fire history report has been incorporated into the document. Issues identified and considered include access location, gates and associated problems, road closures, minimum environmental impact of development, locations of proposed alternative routes, staging areas, road length, access location within the community, and potential impacts to nearby residences.

During Mono County's California Environmental Quality Act (CEQA) process in early 2014, comments were received regarding the proposed project. Those comments and a revised Triad Holmes Associates technical report dated March 13, 2014 resulted in Mono County revising their ROW application.

Plan Conformance:

The proposed action is subject to the Bishop Resource Management Plan (RMP), approved March 25, 1993 and is within the Granite Mountain Management Area. The RMP has been reviewed.

The management theme for the Granite Mountain Management Area is to protect and enhance wildlife habitat and scenic values, and provide opportunities for dispersed recreation while allowing mineral exploration and development.

Bishop RMP direction that specifically applies to the proposed action provides that "Management will be on the basis of multiple use and sustained yield" pursuant to Section 102 (a)(7) of the Federal Land Policy and Management Act of 1976 (FLPMA), (General Policies, Page 8, No. 1). The Bishop RMP also provides that "Management of public lands will consider ... [s]afety of the public and Bureau personnel" (General Policies, Page 8, No. 8 a.).

Pursuant to Section 501(a)(1-7) of the FLPMA, the BLM is authorized to grant rights-of-ways, amendments, and temporary use permits for uses such as pipelines, roads, power lines, wells, and other facilities on the public lands for the public good.

In addition, the following Area Manager's Guidelines, Standard Operating Procedures, and Decisions prescribed by the Bishop RMP apply to the proposed action:

1. Actions that interfere significantly with efforts to maintain or enhance sage grouse habitat will generally not be allowed (Area Manager's Guidelines, Page 9, No. 8).
2. Manage candidate species, sensitive species and other species of management concern in a manner to avoid the need for listing as state or federal endangered or threatened species (Standard Operating Procedures, Wildlife, Page 12, No. 3).
3. Protect and enhance unique or important vegetation communities and wildlife habitats (Area-Wide Decisions, Page 17).
 - Yearlong Protection of endangered, threatened, candidate, and sensitive plant and animal habitats.
 - Seasonal Protection within 2 miles of active sage grouse leks from 5/1 to 6/30.

4. Manage the area to conform to the following Visual Resource Management (VRM) standards (Granite Mountain Management Area Decisions, Page 36)

- VRM II - Mono Basin and Granite Mountain.

The Bishop RMP defines Yearlong Protection as: No discretionary actions which would adversely affect target resources would be allowed. Existing uses and casual use would be managed to prevent disturbance which would adversely affect the target resources. Locatable mineral exploration and development could continue, with appropriate mitigation (see Bishop RMP Glossary G-7).

The Bishop RMP defines Seasonal Protection as: During the period specified, no discretionary actions which would adversely affect target resources would be allowed. Existing uses and casual use would be managed to prevent disturbance which would adversely affect the target resources. Locatable mineral exploration and development could continue, with appropriate mitigation (see Bishop RMP Glossary G-6).

Without mitigation, the proposed action and alternatives, except for the “No Action” alternative, would result in minor adverse impacts to sensitive wildlife species habitat, specifically habitat for the Bi-State distinct population segment (DPS) of greater sage-grouse. This would not conform to the RMP decision that requires “Yearlong Protection” of endangered, threatened, candidate and sensitive plant and animal habitats. Additionally, without mitigation, the action alternatives would likely not conform to the RMP decision that requires “Seasonal Protection” within 2 miles of active sage grouse leks from 5/1 to 6/30. Finally, without mitigation, the proposed action and action alternatives would not be consistent with RMP guidance specific to the maintenance and improvement of sage-grouse and mule deer habitat. Please refer to the vegetation and wildlife affected environment and environmental impacts sections concerning these issues.

Mitigation measures have been recommended for all the action alternatives which, if applied, would bring the action into conformance with the Bishop RMP.

A. Proposed Action and Alternatives:

As a result of the Mono Basin RPAC subcommittee work, BLM public scoping, various discussions with fire personnel, and the Mono County ROW application, six alternatives were developed for consideration in this environmental review. The following table provides a comparison of the alternatives regarding certain features of each alternative (see Map 2, Map 3 and Photos 1-7).

SUMMARY OF ALTERNATIVES

Alternative	Length (Feet)	Number Turnout	Gates	Vegetation* Loss (Acre)	Potential** Mitigation (Acre)
Fire Station	2,850	2	3	0.30	0.30
East Side	3,242	1	2	0.85	1.35
Blue Lake	3,918	10	2	0.82	1.32
Cemetery	7,107	18	0	0.79	1.29
Goat Ranch	3,654	9	2	0.98	1.48
No Action	0	0	0	0.00	0.00

As of the date of this EA, the Poleline material pit has been closed and rehabbed, except for the eastern most access road which has been blocked with boulders and signed.

Under all alternatives, the secondary access road would be 12 feet wide with a hard-packed or graveled surface and locking gates (except for the Cemetery alternative). The road would be county maintained and snow-plowed.

The access road must comply with the County Fire Safe Standards listed in Chapter 22, Land Use Element of the Mono County General Plan. Under the plan, one-way roads shall be a minimum of 10 feet wide and shall not exceed 2,640 feet in length and a turnout shall be placed and constructed at approximately the midpoint of the one-way road. The Fire Station alternative would have a one-way portion being 2,590 feet long and a two-way portion being 260 feet long. The East Side alternative would have a one-way portion being 2,550 feet long and a two-way portion being 692 feet long. The remaining alternatives have one-way routes and exceed 2,640 feet and would utilize a turnout every 400 feet.

*Assumptions: Because the interior material pit roads have been ripped and seeded except for the eastern most pit road, the vegetation loss for alternatives that use these rehabbed roads was calculated using a full 12 feet wide road disturbance.

**For all alternatives, except for the Fire Station and No Action, total vegetation loss would be increased by 0.5 acres due to eastern most pit road not being currently rehabbed. Total mitigation for replacing vegetation loss for each alternative would then be: Column 5 Veg Loss + 0.5 Acres = Maximum Potential Mitigation Acres.

A.1. Fire Station Alternative - Proposed Action

This alternative represents the Mono County revised secondary ingress/egress road right-of-way (ROW) application. The proposed action would be the issuance of a FLPMA thirty (30) year renewable road ROW (CACA 052688) for the construction, operation, maintenance, and termination of a gravel secondary ingress/egress access road. The access road would begin at the Mono City Fire station and end at Highway 167 (see Map 2, Map 3, Map 3-A, and Photos 1-4).

The existing material pit dirt road would be improved to 12 feet wide, would be about 2,220 feet long, and considered to be a one-way road. A new one-way road segment being 12 feet wide and 370 feet long would be constructed from the pit road intersection with the parallel road to the well located at the fire station. The existing 12 foot wide 260 feet long dirt road from the fire station parking area to the well would be widened to 18 feet and would be considered to be a two-way road. The overall length of this proposed secondary access route would be 2,850 feet (0.53 miles).

Two turnouts would be utilized. One turnout at the mid-point between the well and Highway 167 would have a width of 10 feet, length of 30 feet, and a 25 foot long taper at each end (550 ft² of disturbance). The other turnout (hammerhead) being 20 feet wide and 60 feet long would be adjacent to the well utilizing an existing disturbed area. This turnaround would be at the end of the two-way road. It is also expected that at the intersection of the parallel road and the proposed secondary access road, this intersection could be used for turn-around or turnout purposes.

The surface area of the proposed road would be about 35,760 ft² (0.82 acres) and two turnouts would comprise about 550 ft² (one turnout-turnaround at the well is previously disturbed). The total project disturbance area would be about 13,210 ft² (0.30 acres). Vegetation loss from construction would be 0.30 acres.

For road construction, the underlying dirt soil would be scarified, moisture-conditioned and re-compacted to provide a competent base. This would either serve as the road surface or it may be topped with a four-inch layer of compacted Class II aggregate base capable of supporting a 40,000 pound load. Any existing asphalt road pavement base would be retained if it could be incorporated into the new road surface.

Signs stating that the road is for "emergency use only" would be posted at Highway 167, both sides of parallel road intersection, and at the fire station.

Three locking gates would be installed: one gate at the Highway 167 entrance, one gate where the road intersects the parallel road on the north side of intersection, and one gate just past the well on the new road segment. The gates would replace the existing boulders currently blocking road use as the result of rehabilitation of the material pit.

Concrete filled steel bollards would be placed around the well head and monitoring station to prevent accidental damage.

Construction activities would take place once authorization is received and funding is approved by Mono County. Construction would take about 2 weeks. Water would be used for dust control during construction activities. Mono County would apply for a road encroachment permit from CalTrans for Highway 167 which may require an asphalt paved apron.

The road would require periodic grading and would be plowed for snow. It is expected that maintenance grading would be minimal since the road would receive little use except for in emergencies. Snow removal would be conducted at any time and on a “when needed” basis as determined by the county. The road could be used for emergency access during any time of year.

Mono County would be responsible for all construction, material, long-term maintenance and mitigation costs.

This alternative by its location would utilize the existing Fire Station as a gathering or staging point for Mono City residents evacuating the subdivision during an emergency.

The station is accessed by Silver Lake Way, a paved road intersecting with East Mono Lake Drive. The station is located on the subdivision northern boundary and near the subdivision eastern end and about three-quarters (3/4) of the way through the subdivision. The station parking lot is paved with asphalt grindings which wrap around the east and north side of the station with a paved driveway on the west side. The paved area is 80 feet by 150 feet (east side) and 40 feet by 45 feet (north side) and the driveway is 12 feet wide. The proposed access road would enter the paved area on the north side near the existing water well. This well area was fenced with chain-link about two years ago. The parking lot or paved areas could be used for staging for both residents and emergency vehicles entering or exiting the subdivision.

A.2. East Side Alternative

Under the East Side alternative, the proposed action would be the issuance of a FLPMA thirty (30) year renewable road right-of-way (ROW) (CACA 052688) for the construction, operation, maintenance, and termination of a gravel secondary ingress/egress access road. The access road would begin at the east end of the Mono City subdivision and end at Highway 167 (see Map 2, Map 3 and Photo 5).

Near the eastern edge of Mono City, the existing 692 foot long dirt road would be improved to 18 feet wide creating a two-way road. In addition, the proposal would require new road construction beginning at the parallel road intersection and going north toward Highway 167. This new one-way road segment would be 12 feet wide and 2,550 feet long. Portions of the existing road are located on National Forest System lands would require a USFS analysis and land use authorization in addition to the BLM ROW grant. A road application has not been submitted to the USFS for the proposed use in this alternative. The overall length of this proposed secondary access route would be 3,242 feet (0.61 miles).

One turnout, at the midpoint between the parallel road and Highway 167, would be constructed with a width of 10 feet, length of 30 feet, and a 25 foot long taper at each end. It is also expected that at the intersection of the parallel road and the proposed secondary access road, this intersection could be used for turn-around or turnout purposes.

The surface area of the proposed road would be about 43,056 ft² and the one turnout would comprise about 550 ft². The total project disturbance area would be about 37,378 ft² (0.85 acres). Vegetation loss from construction would be 0.85 acres.

For road construction, the underlying dirt soil would be scarified, moisture-conditioned and re-compacted to provide a competent base. This would either serve as the road surface or it may be topped with a four-inch layer of compacted Class II aggregate base capable of supporting a 40,000 pound load.

The eastern most material pit road covering 0.5 acres would be rehabbed with native vegetation.

Signs stating that the road is for “emergency use only” would be posted at Highway 167 and the parallel road intersection.

Two gates would be installed, one at the Highway 167 entrance and one where the road would intersect the parallel road.

Construction activities would take place once authorization is received and funding is approved by Mono County. Construction would take about 2 weeks. Water would be used for dust control during construction activities. Mono County would apply for a road encroachment permit from CalTrans for Highway 167 which may require an asphalt paved apron.

The road would require periodic grading and would be plowed for snow. It is expected that maintenance grading would be minimal since the road would receive little use except for in emergencies. Snow removal would be conducted at any time and on a “when needed” basis as determined by the county. The road could be used for emergency access during any time of year.

Mono County would be responsible for all construction, material, long-term maintenance, and mitigation costs.

Under this alternative, residents and emergency vehicles would use both East Mono Lake Drive and Peeler Lake Drive as entrance and exiting routes leading to the proposed secondary access road. There would be little ability to stage or organize vehicles during an emergency event except for using the existing paved subdivision roads.

A.3. No Action Alternative

Under the no action alternative, the proposed road ROW would not be issued for a secondary access road and the proposed road work would not be completed (see Map 2 and Map 3).

The eastern material pit road would be rehabbed covering 0.5 acres. The existing asphalt pavement (16 feet by 400 feet by 2-3 inches thick) would be removed. The 2,170 foot long material pit road would be scarified, seeded, and straw mulched and would remain closed. Mono County would be responsible for all construction and material costs for the rehab.

Secondary ingress/egress for Mono City would be limited to East Mono Lake Drive and an unimproved dirt road known as the eastern portion of the parallel road which ties into the county maintained Cemetery road. The unimproved dirt road that would most likely be used by residents to access the parallel road would be the road at the east end of Mono City which intersects the parallel road and then turn east towards the county maintained road known as Cemetery road.

Access to the parallel road could also be from a two track trail near Blue Lake Road (parallel road), two unauthorized dirt roads originating from three residential yards (not considered to be useable by anyone else), and a curvy dirt road near the fire station well (road is actually over the buried water pipeline).

A.4. Alternatives Considered but Eliminated from Detailed Analysis

As a result of the May 10, 2011 public scoping meeting and written comments on the proposed project, three additional alternatives were identified for consideration in this environmental review: the Blue Lake, Cemetery (eastern portion of the parallel road), and Goat Ranch alternatives. These alternatives were considered but eliminated from detailed analysis (see Map 2 and Map 3).

The **Blue Lake Alternative** originates within the Mono City development and takes its name from Blue Lake Road. Located about half way through the subdivision, Blue Lake Road intersects with East Mono Lake Drive and runs south. The north extension of the road was never developed and within the subdivision it is a dirt trail, which upon entering public land becomes a dirt road that winds northeast and intersects with the poleline or parallel dirt road located north of Mono City. Under this alternative, the secondary road would start at the Blue Lake intersection going north and continue to the parallel road and then continue until the intersection of the first pit road that travels north through the now rehabilitated CalTrans mineral material pit to Highway 167. Mono County would be responsible for all construction, material, long-term maintenance costs, and rehab of the eastern pit road.

The Blue Lake alternative would be about 3,918 feet (0.74 miles) in length, have ten turnouts, and two gates. The total project disturbance area and vegetation loss from

construction would be 0.82 acres. In addition, the eastern most pit road (0.5 acres) would have to be rehabbed. There would be no staging area associated with this alternative.

This alternative was eliminated from detailed analysis because it would not meet the purpose and need as defined by Mono County. It is the fourth longest alternative, would not be a direct route, and would have numerous curves. It is unknown whether the north extension of the Blue Lake Road actually exists, and if not, then an easement would have to be obtained from the private property owner for this segment of this proposed route. There would be no opportunity for a staging area associated with this alternative.

The **Cemetery Alternative** (eastern portion of the parallel road) originates at the east side of the Mono City subdivision, goes north on an existing dirt road until meeting the parallel road then turns east and goes until meeting the county maintained cemetery road at which point travel could be east to Highway 167 or west to Highway 395. Mono County would be responsible for all construction, material, long-term maintenance costs and rehab of the eastern pit road (see Photo 6).

The Cemetery alternative would be about 7,107 feet (1.35 miles) in length, have 18 turnouts, and no gates. The total project disturbance area and vegetation loss from construction would be 0.79 acres. In addition, the eastern most pit road (0.5 acres) would have to be rehabbed.

Under this alternative, residents and emergency vehicles would use both East Mono Lake Drive and Peeler Lake Drive as entrance and exit routes leading to the proposed secondary access road. There would be no staging area associated with this alternative.

The majority of this alternative would be located on National Forest System lands. The BLM requested input on this alternative from the Inyo National Forest. Generally, the forest indicated that this alternative would not be consistent with the Mono Basin National Forest Scenic Area Comprehensive Management Plan direction. As a result of this, the forest would prefer an alternative that avoided impacts to the scenic area and would support any reasonable alternative in that regard.

This alternative was considered but eliminated from detailed analysis because it would not meet the purpose and need as defined by Mono County. It has the greatest length of all alternatives considered and therefore poses a higher safety risk due to longer travel time during an emergency. There would be little ability to stage or organize road use during an emergency event. In addition, it appears that development of this road would not meet USFS direction for management of the Mono Basin National Forest Scenic Area and from a USFS perspective, other alternatives would be preferable.

The **Goat Ranch Alternative** was suggested by CalTrans (Letter dated May 6, 2011) due to their desire to have the secondary route enter Highway 167 at an established

intersection where the Goat Ranch Road meets Highway 167 on the north side of the highway.

Under this alternative, a new road (795 Feet long) would be created opposite the Goat Ranch Road and tend southeast toward the rehabbed material pit, at which point it would tie into pit roads running diagonally through the pit and connecting with the parallel road then travelling across a new road to the Mono City Fire Station. Mono County would be responsible for all construction, material, long-term maintenance costs, and rehab of the eastern pit road.

The Goat Ranch alternative would be about 3,654 feet (0.69 miles) in length, have 9 turnouts, and two gates. The total project disturbance area and vegetation loss from construction would be 0.98 acres. In addition, the eastern most pit road (0.5 acres) would have to be rehabbed. There would be a staging area associated with this alternative by using the fire station.

This alternative was considered but eliminated from detailed analysis because it would not meet the purpose and need as defined by Mono County. The road would not be a direct route and would have numerous curves throughout. It is the third longest route of all the alternatives considered and therefore poses a higher safety risk due to longer travel time during an emergency. There would be some ability to stage or organize road use during an emergency event by using the fire station parking lot. This alternative has the highest vegetation loss.

B. Affected Environment and Environmental Impacts

B.1. Fire Station Alternative - Proposed Action

Required Resource Analysis

The proposed action is not within a Wilderness, Wilderness Study Area (WSA), Area of Critical Environmental Concern, Wild and Scenic River Corridor, Essential Fishery Habitat or Wild Horse and Burro Herd Management Area and there would be no effects on any lands so designated.

There would be no impacts to prime farm lands or water quality (including ground or surface waters).

There would be no effect on any federally listed threatened or endangered species, or any designated critical habitat for any federally listed species. The Bi-State distinct population segment (DPS) of greater sage-grouse, a BLM designated sensitive species and a proposed threatened species under the Endangered Species Act, occurs within the proposed action area and the proposed action area is within proposed designated critical habitat.

Wilderness Characteristics

The proposed action would be on public land that was inventoried for wilderness characteristics in 1979 and was identified as CA-010-091 Mono Lake, and was considered an area which clearly and obviously did not meet the criteria for identification as a Wilderness Study Area (WSA).

The inventoried area was impacted by power distribution lines and telephone lines with associated maintenance roads, two old material sites which are active, an existing material pit that has recently been rehabilitated, livestock drift fences and associated maintenance road, county maintained dirt roads, two highways, and established roads that reduced the contiguous road-less area into less than 5,000 acres. The area was reviewed in 2011 and 2012 and all of the various man-made intrusions are still there and continue to impact the area. The area does not have wilderness characteristics at this time.

Air Quality

The project area is within the Great Basin Unified Air Pollution Control District (GBUAPCD). The proposed action is within the Mono Basin federal air quality nonattainment area. A State Implementation Plan (SIP) has been prepared for the planning area which identifies sources of emissions and control measures to reduce emissions. Federal actions are subject to conformity determinations under 40 CFR 93.

In order to determine the impact of PM10 emission, the action's emissions must fall below the Federal Conformity Rule De Minimis threshold level of 70 ton/yr. It must also be below a significant level which is defined as less than 10 percent of a non-attainment or maintenance area's total emissions budgeted for that pollutant. In the case of the Mono Basin non-attainment area this budgeted amount is 5,665 tons per year and 10 percent of this amount is 566 tons per year.

The proposed action would result in PM10 emissions from construction generated dust and equipment exhaust. Water would be used for dust control during construction and rehab activities. It is projected that direct and cumulative emissions would be well below the 70 tons/year threshold for a conformity determination (40 CFR 93) and below the 566 tons per year maximum. Because the increase in PM10 associated with the proposed action is clearly de minimis, there is minimal impact on air quality.

Cultural Resources

A Class III cultural resource inventory of the area of potential effect (APE) for the proposed project including three alternatives was completed in May 13, 2011 by the Bishop Field Office Archaeologist. No cultural resources were located within the APE or 5 meter buffer for the proposed project. There will be no impact to cultural resources as a result of the proposed action. The results of this evaluation are detailed in Cultural Resource Inventory Report: CA170-09-28. If previously unidentified cultural resources

are encountered during project implementation, all project activity shall cease and the Field Manager and Archaeologist will be contacted (see Cultural Mitigation B.1.M. 11).

Visual Resources

The proposed action would take place on public lands having a Visual Resource Management (VRM) rating of Class II. VRM Class II is defined as, "Changes in any of the basic elements (form, line, color, texture) caused by a management activity should not be evident in the characteristic landscape. A contrast may be seen but should not attract attention."

The Key Observation point for the proposed action would be along Highway 167. The highway is traveled by the public moving between Hawthorne, NV and Highway 395 along the eastern Sierra Nevada. The highway is used by Mono City residents for access to the Mono City subdivision via East Mono Lake Drive and as a secondary access road to Bodie via the Cottonwood Canyon Road. The highway is also used by recreationalist, livestock operators, ranch owners, and utility maintenance crews periodically throughout the year with highest travel taking place during summer. Travel speed on this highway is about 60-65 MPH and the dominant views are to the south towards Mono Lake when traveling easterly and towards the Sierras and Mono Lake when traveling westerly.

Under the Fire Station alternative, an existing dirt road which intersects the highway would be improved. This road originates from the highway at an 80-90 degree angle to the south, generally heading southeast and continuing in a curvilinear path for about 1,600 feet. The road entrance is blocked by large boulders which are set back from the highway by 25 feet. The road is un-noticeable to any travelers along the highway, except when directly opposite the road entrance. The road is flanked by 2-3 foot high shrub vegetation which shields the road from view. This vegetation effectively blocks the road from view along the highway.

Upon completion of the proposed action, the road would be widened and graveled. Shrub vegetation along both edges would still be retained. A gate would replace the boulders in the same location.

It is expected that travelers on Highway 167 would not notice the road after improvement. Regardless of travel direction, the shrub vegetation bordering the improved road would block views of the improved road. The high travel speeds prohibit the viewer from being exposed to the dirt road entrance and gate for an extended time period thereby causing the landscape variance to quickly pass from view.

The project would meet Class II VRM standards. The proposed action would not be evident to the traveling public. The minimal changes in the basic elements caused by the proposed management activity would be slightly noticed in the characteristic landscape but not attract attention.

Vegetation/Threatened and Endangered/Special Status Plants

Vegetation, General

For the purposes of the vegetation sections of this document, the project area is considered to be the area that lies south of Highway 167, north of Mono City, east of Highway 395 and west of the BLM/National Forest boundary (just east of the East Side route alternative). This area is approximately 300 acres. The project area occurs within a Great Basin mixed scrub (Holland 1986) vegetation community. Vegetation cover is approximately 30 - 50% and is dominated by big sagebrush (*Artemisia tridentata* ssp.), bitterbrush (*Purshia tridentata*), desert peach (*Prunus andersonii*) and rabbitbrush (*Chrysothamnus*, *Ericameria* species). Around the old CalTrans material pit, big sagebrush (*Artemisia tridentata* ssp.) occurs in a low growing form which resembles the low sagebrush (*Artemisia arbuscula*) vegetation type in terms of its growth form and openness between shrubs. Indian ricegrass (*Stipa hymenoides*) is common and abundant in many areas. Several species of forbs also occur throughout the understory. The vegetation type is common to the area.

The Fire Station route would primarily follow an existing dirt and asphalt road that is generally devoid of vegetation. There is vegetation lining the road on both sides. The vegetation that is adjacent to the proposed Fire Station route is broken up by ground/vegetation disturbances due to several old, unpaved roads and the old CalTrans material pit. These roads (excluding the Fire Station alternative road) have been rehabbed along with the material pit as described in the Proposed Action and Alternatives section of this document. The Fire Station road was planned to be rehabbed as part of the material pit rehab, but road rehab was postponed until a final determination concerning future use of the road was made.

The widening of the existing road (from approximately 9' to 12'), the construction of 370 feet of new road, the widening (from 12' to 18') of 260 feet of existing road, and the creation of one turnout would result in approximately 0.30 acres of new vegetation disturbance, therefore, the proposed action would result in a permanent (reasonable foreseeable future) vegetation/habitat loss of 0.30 acres. Due to road construction and maintenance, vegetation would not regrow in this area.

The proposed action would cause direct impacts to the vegetation due to removal of native vegetation and permanent loss of habitat, indirect impacts may occur due to a slight increase in potential for spread of invasive plants (see Invasive Plants section below). Overall, the proposed action would: a) result in an approximately 0.30 acre of new vegetation disturbance; b) result in the permanent loss of 0.30 acre of vegetation; and c) primarily impact vegetation that is common and abundant in the area and elsewhere in the Great Basin.

Special Status Plant Species

The BLM uses the term "Special Status Plants" to include:

- Federal endangered, threatened, and proposed plants.
- BLM designated sensitive plants. Sensitive plants are those species that are not federally listed as endangered, threatened or proposed for federal listing, but which are designated by the BLM State Director for special management consideration. By national policy, federal candidate species are automatically treated as sensitive. The California State Director has also conferred sensitive status on California state listed endangered, threatened, and rare species, on species on List 1B (plants rare and endangered in California and elsewhere) of the California Native Plant Society's Inventory of Rare and Endangered Plants of California (unless specifically excluded by the State Director on a case-by-case basis), and on certain other plants the State Director believes meet the definition of sensitive.

No federally listed threatened, endangered, or proposed plants or designated critical habitat are known or suspected to occur in the project area. Therefore, the proposed action would have no effect on threatened, endangered, or proposed plants or their designated critical habitat.

No BLM designated sensitive plants are known or expected to occur within or immediately adjacent to the project based on a records search of the California Natural Diversity Database (CNDDDB - 2013), California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants, Bishop Field Office records and surveys conducted in the proposed project area.

Invasive, Non-native Plants

The majority of the project area, including the existing road (proposed Fire Station road) and the old material pit, is relatively free of invasive, non-native plants. However, cheatgrass (*Bromus tectorum*) and Russian thistle (*Salsola tragus*) are common within the fuel break that runs along the BLM boundary just north of Mono City. This mowed fuel break was established in 2005, subsequent mowings have occurred every 2-3 years.

It is reported by BLM staff (personal communication, Dale Johnson) that Russian thistle and other non-natives existed along the very north edge of Mono City prior to the mowing. An increase was noted after the first mowing however perennial grasses have also responded favorably to the mowing. Perennial grasses continue to do well in the mowed area despite apparent increases in cheatgrass and Russian thistle (Field Office staff observation).

No California A-rated invasive, non-native species are known to occur within the project area.

Equipment used in the implementation of the proposed action could result in the introduction and/or spread of invasive, non-native plants. Ground disturbance associated with the proposed project would result in the area being more susceptible to invasion by non-natives such as cheatgrass, Russian thistle, tumble mustard (*Sisymbrium altissimum*) and other non-natives. Establishment and spread of non-natives could result in adverse impacts to the native vegetation and increased fire danger.

Given that the existing vegetation is relatively intact and free of non-natives, the majority of the footprint of the disturbance area is already free of vegetation, and the majority of the disturbed area would be topped with gravel, it is not expected that the proposed action would result in a dramatic increase in non-natives throughout the project area. Overall, the proposed action is expected to have minimal impacts to invasive, non-native plant distribution or abundance, however without invasive plant mitigation measures there is some chance of invasive plants establishing and spreading.

Wildlife/Threatened and Endangered/Sensitive Species and Habitat

Site specific wildlife surveys occurred June of 2012 and March of 2013.

Wildlife General

The sagebrush-bitterbrush habitats in the area support a variety of wildlife species, including migratory birds, small mammals, mule deer (*Odocoileus hemionus*), coyotes, and other species. Migratory birds in the vicinity of the project area may include sagebrush-obligate songbirds such as sage sparrow, sage thrasher and brewer's sparrow and other birds that largely depend on shrub habitats. Pygmy rabbit (*Brachylagus idahoensis*) and greater sage-grouse (*Centrocercus urophasianus*) are both BLM sensitive species that could be found in or near the project area and are discussed in further detail below.

No long-term impacts are expected to wildlife in general because the amount of habitat lost (less than one acre) is a very small proportion of the habitat available to wildlife in the area. The project area is surrounded by thousands of acres of suitable habitat with similar characteristics as found along the edges of the road that is proposed for use. Additionally, the existing habitat is fragmented by the pit road and therefore of lower quality for wildlife. In the short-term, wildlife may be displaced during road grading, road construction or turnout construction activities, but these activities are expected to be of short duration, resulting in minimal disturbance.

There may be negative impacts, such as nest destruction or abandonment, to nesting migratory birds if project activities occur during the breeding season, unless mitigation to limit vegetation removal during the breeding season is in place.

The proposed action area is important habitat for the Mono Lake mule deer herd, particularly in spring and fall as they migrate to and from the Sierra. Evidence of deer

use was found throughout the proposed action area. Additionally, bitterbrush, a primary forage plant for deer, is abundant in and around the proposed road. Project activities, particularly heavy equipment use, during the spring and fall would result in adverse disturbance impacts to deer. Increased dispersal or avoidance of an area of use could result in increased metabolic costs, which could in turn lead to decreased reproductive success and survival. Project activities would also result in less than an acre of habitat loss. Additionally, if no mitigations to limit the spread of invasives are in place, habitat could be lost as a result of impacts from invasive plant species. Because most of the proposed road is already in existence, and little new vegetation removal is proposed, use of the existing road with the additional turnouts would have minimal adverse impacts on deer habitat. However, despite the minimal impacts, an unmitigated loss of 0.30 acres of habitat would not be consistent with Bishop RMP direction for the Granite Mountain Management area to maintain and enhance habitat for mule deer.

Threatened, Endangered, Candidate and Sensitive Species

There are no federally listed threatened or endangered species or designated critical habitat in the project area. The Bi-State Distinct Population Segment (DPS) of greater sage-grouse (*Centrocercus urophasianus*) is proposed as threatened under the Endangered Species Act. The Bi-State DPS is also a BLM designated sensitive species. The Bi-State DPS occurs in the project area and the project area is within the boundaries of proposed critical habitat. The pygmy rabbit is also known to occur near the project area and is a BLM designated sensitive species.

Pygmy rabbit

Pygmy rabbits are a sagebrush-obligate species known to occur in the project vicinity. One of two rabbit species in North America that dig their own burrows, pygmy rabbits are dependent on areas of sagebrush growing in deep, friable soils. Pygmy rabbits remain close to their distinctive-looking burrows, so their presence or absence in a specific area may often be determined with a high degree of confidence by searching for their burrows.

The project area was searched for sign of pygmy rabbits. No burrows were located and it is likely that the soils are too sandy to support pygmy rabbit burrows. Only a small number of shallow holes (less than a 3 inches deep) dug by animals were located, which also indicates that the soil is not suitable for burrows. The nearest known pygmy rabbit location is approximately 1.75 miles to the west. Because pygmy rabbits are not expected to occur in the project area, no impacts are expected.

Greater Sage-Grouse

On October 28, 2013 the US Fish and Wildlife Service (FWS) proposed to list the Bi-State DPS as threatened under the Endangered Species Act and at that same time proposed to designate approximately 1.8 million acres of critical habitat (USDI 2013 a and b). Proposed critical habitat for the DPS was divided into 4 units and the project

area is in the North Mono Unit (853,397 acres) (USDI 2013b). A conservation plan for sage-grouse in the Bi-State area was created in 2004. In 2012, a new plan (Action Plan) was created to summarize accomplishments related to the 2004 plan and to strategize future conservation efforts (Bi-State Technical Advisory Committee (TAC) 2012). Population Management Units (PMU) were delineated for the Bi-State DPS and the project area is in the Bodie PMU. The Action Plan characterizes wildfire and pinyon-juniper encroachment as the highest threats in the Bodie PMU while linear infrastructure (such as power lines) and urbanization (such as an increase in residential structures in grouse habitat) are moderate threats.

The Bodie PMU includes one of the largest breeding complexes in the Bi-State area. The Thompson Ranch lek (strutting area for males) is approximately 1 mile from the proposed road. This lek is considered active at this time, as 2 males were observed strutting there in 2011. Greater sage-grouse generally nest in the vicinity of leks and studies have found high percentages of nests within 3.2 km (2 miles) of occupied leks (Braun 1977). Sage-grouse population trends in the Bodie PMU, as indicated by annual lek censuses, go through periods of highs and lows, but overall remain stable (Bi-State Technical Advisory Committee 2012).

A conservation plan for sage-grouse in the Bi-State area was created in 2004. In 2012, a new plan was created to summarize accomplishments related to the 2004 plan and to strategize future conservation efforts (Bi-State Technical Advisory Committee 2012). This 2012 plan characterizes wildfire and pinyon-juniper encroachment as the highest threats in the Bodie PMU while linear infrastructure (such as power lines) and urbanization (such as an increase in residential structures in grouse habitat) are moderate threats.

The density and distribution of the sagebrush and bitterbrush in the project area is characteristic of winter and nesting habitat for grouse throughout the Bodie PMU. Suitable canopy cover of sagebrush for sage-grouse varies throughout their range and across seasons, with shrub cover generally ranging from 12-45% (Connelly et. al 2000, Kolada et. al 2009) and the vegetation in the project area falls within this range. Grouse scat was observed in the vicinity of the proposed roads during surveys. However, grouse sign increased with distance from Mono City. The location of the majority of proposed permanent vegetation loss is directly adjacent to the fire station. No grouse sign was observed in this area. This area is of poor quality for grouse due to existing surface disturbance and the potential for disturbance and edge effects from the adjacent development.

Potential impacts to sage-grouse include direct loss of habitat, alteration of habitat through introduction of invasive species and disturbance from noise during construction and maintenance of the road.

The proposed action would result in the direct loss approximately 0.30 acres of proposed critical habitat. This represents less than 0.000117% of the proposed critical habitat in the North Mono Unit. This amount of habitat is loss is so small that there

would be no impact on grouse populations. Additionally, the majority of the habitat loss is of habitat that is of lower quality due to the proximity to development. The loss of 0.3 acres of habitat, without mitigation, is inconsistent with the Bishop RMP direction of yearlong protection of sensitive species habitat.

Habitat alteration could occur from invasive species that could be spread during construction activities. Any potential habitat alteration would be a small proportion of the habitat available to grouse in the area because of the limited disturbance proposed. However, because there could be a loss of a small amount of habitat, without mitigation this alternative is inconsistent with the Bishop RMP direction of yearlong protection of sensitive species habitat.

Additionally, unless timing mitigations are in place to limit disturbance to grouse from project activities during the nesting season, this alternative would not conform to Bishop RMP direction to provide "Seasonal Protection" within 2 miles of active leks during the period of 5/1 to 6/30 (nesting season). Without mitigation, use of heavy equipment, such as snow plows and construction or maintenance equipment during the winter and nesting periods could lead to grouse avoiding the area.

In summary, the proposed action is not likely to adversely affect proposed critical habitat. Any potential effects are discountable because the amount of habitat removed is minimal in relation to the amount available (less than 1 acre of an available 853,397 acres) and the habitat where the majority of the disturbance is proposed is of poor quality for grouse due existing surface disturbance and proximity to development. However, without mitigation the proposed action would be inconsistent with direction in the Bishop RMP and could have short-term impacts on individual grouse that may be displaced during construction activities.

Minerals

No impact. There are no known mining claims or mineral material leases or ROWs in the proposed action area except for the CalTrans material pit known as the Poleline Pit (MS 117 and 117A) which was authorized under ROWs CAS 0057323 and CAS 0051776. The pit was closed and rehabbed in July 2012, except for the eastern most pit road which has been blocked. CalTrans is responsible for a successful pit rehab which usually spans about 3 years. Mono County has committed to rehab the pit road if the road is not authorized for the secondary access road.

Economic Impacts

The proposed action would result in economic impacts at the county level. Mono County would incur all costs for construction, materials, long-term maintenance, and mitigation for the proposed secondary road. The proposed action has been estimated to cost \$41,800 and this estimate does not include mitigation costs which are unknown for potential mitigation rehabilitation. The county has expressed concern that project costs be contained.

Environmental Justice

There would be no disproportionate impacts to low income or minority groups, per Executive Order 12898 (2/11/94). There are no known local groups or low income groups that use the proposed action area.

Hazardous Materials

There would be no hazardous materials associated with the proposed action.

The existing eastern most material pit road does have an old asphalt road base measuring 16 feet by 400 feet by 2-3 inches thick. The asphalt age, location, and form are not considered to be a hazmat issue.

The material pit rehab removed all old asphalt from the pit including old pavement. During pit rehab a tracked vehicle traveled on the eastern road segment easily breaking up portions of the old surface. Since the pit rehab removed all old asphalt and the existing asphalt pavement shows poor mechanical structure, this old asphalt material should be removed unless it can be incorporated into the new road surface.

Adherence to Local, State and Federal Environmental Ordinances/Laws

State and county planning direction is that new subdivisions are required to provide adequate traffic flow in, out, and within a proposed subdivision. Although the county does not have to retrofit an existing subdivision for secondary access, in this project proposal, the county desires to remedy the lack of secondary access to Mono City through a secondary ingress/egress road.

Without an improved secondary access road, it is possible that under certain emergency situations where East Mono Lake Drive would be blocked or unusable, emergency personnel/vehicles may not be able to enter the Mono City subdivision and provide service/aid. It is also possible that fire-fighting personnel/vehicles could not enter the subdivision for structure protection due to safety concerns.

Similarly, evacuation from Mono City may be compromised since the parallel road to cemetery road is not improved and may present a hazard to residents trying to use the road for escape during an emergency event. During the Lundy Fire, reports were that vehicles were detained when a vehicle got stuck while trying to leave Mono City.

Construction and maintenance of an improved secondary access road would help minimize, but not eliminate, these issues.

The access road must comply with the County Fire Safe Standards listed in Chapter 22, Land Use Element of the Mono County General Plan. Under the plan, one-way roads shall be a minimum of 10 feet wide and shall not exceed 2,640 feet in length and a turnout shall be placed and constructed at approximately the midpoint of the one-way

road. The Fire Station alternative would have a one-way portion being 2,590 feet long and a two-way portion being 260 feet long. Two turnouts are proposed for this alternative. This alternative would meet the fire safe standards established by the Mono County General Plan.

Discussion of Trust Status, Federal Trust Responsibilities, Tribal Sovereignty

There will be no impact to tribal interests as a result of this undertaking. The Mono Basin Kutzadikaa Native American community is near the proposed action area. The Kutzadikaa are not a federally recognized tribal group, but they have expressed interest in the Mono Lake Basin regarding BLM proposed management actions in the past. Neither has asserted any interest or concern for the public land involved in the proposed action area. There will be no federal trust responsibilities affected as a result of this project and there is no potential to impact tribal sovereignty.

Land Uses/Realty/Rights-of-Way

The CalTrans mineral material pit (Poleline Pit, MS 117 and 117A) was authorized under ROWs CAS 057323 and CAS 051776. The pit had not been used for years and CalTrans identified the material pit for closure. The material pit has been reclaimed as of 2012.

The pit had numerous interior roads which provided a connection to Highway 167 and the subdivision. Although these roads were not developed for access to the subdivision or as another way for Mono City residents to get to Highway 167, these existing roads could provide a potential secondary access route. In 2009, a BLM fire official, staff, and the local volunteer fire department chief reviewed the pit roads, concluding that the eastern most road with improvement could satisfy the need for secondary access.

During the 2011 public scoping meeting, the public identified three alternatives that utilized some of the pit roads: the Fire Station, Blue Lake, and Goat Ranch road alternatives.

As a result of the Mono County road application, the road scoping meeting, and Caltrans's desire to close and complete the material pit rehab, the BLM and Mono County requested that the pit rehab plan be amended so that the eastern most road would not be rehabbed as part of the pit closure. This was done so that the road could be considered as a viable alternative for this environmental review. Mono County committed to full rehab of the road should this alternative not be selected.

CalTrans completed the pit rehab in July-August, 2012 and the eastern most road was closed but not rehabbed. Since this pit road was planned to be rehabbed under the pit closure and wasn't, any alternative that does not use the eastern most pit road would include rehabbing of the eastern pit road. The vegetation rehab derives from the material pit rehab plan which required rehab of the road.

The Mono City Fire Station is located on a BLM issued Recreational and Public Purpose (R&PP CACA 000153) lease which is expired. A portion of the Fire Station alternative, consisting of a road segment would be located at the northeast corner of the lease and within lease boundaries. The lease would have to be amended for this use. It is expected that this could take place upon renewal of the R&PP lease.

Mono County would be required to obtain an encroachment permit from CalTrans for any road entering Highway 167. CalTrans may require a paved apron where the road would enter the highway. It is expected that the county would obtain the permit, and if needed, pave the access entrance.

Recreation/Social

There would be a slight impact to recreational users from the proposed action. The multiple pit roads were used mostly by local residents to access Highway 167 and areas north of the highway. The use was by pickups, motorcycles, quads, bicycles, and walking. The roads were also used to access the material pit for riding and walking trails, as well as, local dumping of residential debris. This access was eliminated when the material pit was reclaimed in July 2012. Under the proposed action, this loss of access would not change since the pit roads would remain closed and the gated eastern most material pit road would be used only for emergency purposes. Walking could still take place (see Map 1).

The potential for an increase of recreational use activity through the Fire Station, due to the creation of a new road to connect the Fire Station parking lot to the parallel road as part of the secondary access road, would be eliminated by the proposed placement of a gate between the Mono City well and the parallel road. Although this connection was previously accomplished using an existing dirt road near the well (buried water pipeline corridor), the new road would be a convenient path to get to the parallel road and most likely be used rather than well road (buried pipeline corridor). It is unknown how often the Fire Station well road was used and whether the general public was also using that route. In the public scoping meeting, an adjacent resident voiced concern over the potential increased use through the Fire Station as a result of the new road, such as, during hunting season. The addition of a gate at the well and the beginning of the new one-way road has eliminated the potential increase recreational use through the Fire Station and using the new secondary road.

In addition, there are four north side Mono City residents with dirt road access to the parallel road. These access points, which are unauthorized and have been developed over time, have been used by individual property owners for exclusive access to the parallel road and eventual access through the material pit and the cemetery road. The parallel road terminates at the west end into a private parcel located along East Mono Lake Drive. The above uses would continue under the proposed action except for the access through the pit which has been closed (see Photo 7).

The parallel road does not meet BLM Travel and Transportation System criteria for providing reasonable and varied transportation routes for accessing the public land and for recreational use, agricultural purposes, commercial and educational uses. The parallel road terminates into a private parcel at one end and ends at a county road. It does not lead to a recreational site, nor can it be used for through access by non-street legal vehicles since the vehicles can't use the county road. In this case, should the private parcel be developed, then access to parallel road would be terminated, therefore, the BLM would not consider the parallel road as part of the inventoried transportation system. The parallel road could be closed for mitigation.

In an emergency event, East Mono Lake Drive, the parallel road to Cemetery road, and the proposed Fire Station secondary ingress/egress road could be used for evacuation and emergency vehicle access.

In an emergency event where East Mono Lake Drive might be blocked, the proposed Fire Station secondary ingress/egress road could be used for evacuation and emergency vehicle access. The Fire Station parking lot could be used as a staging and gathering area for entrance to or exit from the subdivision. The west portion of parallel road would most likely not be used since it would be faster and safer to drive down East Mono Lake Drive and then proceed to the Fire Station route or east to the end of Mono City and then to the eastern portion of parallel road and to the county Cemetery road.

Fire Management

Since 1970 there have been 41 documented wildland fire ignitions within 5 miles of Mono City. Twenty-three (56%) were lightning caused. Fires occurred from April through December with June, July and August being the busiest months. Eight fires exceeded 1/2 acre in size while most (66%) were less than 1/10th acre. No fires occurred in Mono City itself. The largest (Lundy Fire) burned 740 acres during a wind event on April 24, 2003 and was contained later that day. Same day containment is common due to patchy fuels, relatively flat topography and ease of access for nearby suppression resources. Cheatgrass is making fuels more continuous (see Map 5).

Most large fires in the Mono Basin are wind driven. Wind events associated with frontal passage are common from October through May and occasional in June and August. The most commonly observed wind direction is south-southwest. Topography, generally, does not alter wind speed and/or direction except for erratic winds near canyon mouths. Fuels are typically very dry during fire season and fires will respond quickly to wind shifts, gusts and changes in topography. Live fuels green up in May, reach peak fuel moisture in July and are dormant by mid-October. Most precipitation falls as snow and fuels may be snowbound November-March. Thunderstorms may have enough rain to extinguish fires. Thermal lows develop in the Mono Basin during the summer and low level atmospheric instability may be observed on otherwise stable days. This can increase fire behavior (see Appendix B).

Based on the above, although one may say that a wildfire would tend to travel north or northeast driven by south or southwest winds, it is not possible to accurately predict where a fire start might occur or which direction a fire would progress.

Beginning in 2004, a vegetative mowing was conducted around the community in order to provide defensive space. The fuel break has been retreated by the BLM and USFS every 3 years. A Fire Safe Council was established for the Mono City community in 2005.

The Mono County Board of Supervisors recognized that the lack of suitable secondary access to the subdivision was a potential safety issue. The Mono County Community Wildfire Protection Plan (CWPP, May 2009) authorized by the Board of Supervisors calls for a secondary access road for Mono City. Within the plan, Mono City has a community hazard rating of moderate (rating range-low to extreme) which is near the bottom of the rating system. That plan also recommended a second means of ingress/egress for the Mono City community. In 2010, The Board of Supervisors directed the county public works department to propose a remedy to this issue (i.e. using the contracted 2009 Triad/Homes Associates Engineering report and the filing of the road ROW application). The Triad engineering report was revised in March, 2014.

Regarding a potential wildland fire event, federal, CalFire, and local fire departments respond to fires with an overriding direction for fire-fighter safety and the goal of protecting life, property, and natural resources. Federal fire-fighters respond to wildland fires and threats to the wildland but are not trained, equipped or responsible for structure fires. CalFire responds to both wildland and structure fires, and local fire departments respond to structure fires and may also work on wildland fires. Regardless of jurisdiction, fire suppression decisions are based on fire-fighter safety and the ability of fire-fighters to safely enter and leave a fire area.

Establishing a secondary ingress/egress road would meet Mono County guidance and would provide a secondary route for both residents and emergency personnel during an emergency event. However, none of the proposed routes would provide for guaranteed secondary ingress/egress under all emergency situations. Mono County would need to closely manage the use of the secondary ingress/egress in the event of an emergency to ensure public safety.

Cumulative Effects

For most resources, there would be no or minimal direct or indirect impacts, therefore there would be no cumulative impacts from implementation of this project.

For vegetation, while there would be some disturbance and loss of habitat, the incremental impact of the project when combined with any past, present, and reasonably foreseeable future actions would be negligible.

For wildlife, while there may be short-term impacts from displacement and minimal habitat loss, these impacts are minor, therefore the incremental impact of the project when combined with any past, present, and reasonably foreseeable future actions would be negligible and are not expected to lead to population level impacts.

B.1.M. Description of Proposed Mitigation Measures

1. Close and rehab at least 0.30 acre of dirt roads and/or selected disturbed areas in the immediate local area (refer to Appendix C Potential Mitigation Rehab Areas). The road segments and/or disturbed areas would be rehabbed by ripping three (3) to six (6) inches deep and would be seeded with native species, chosen in consultation with the BLM. The road segments would be closed at each end with 3-4 foot diameter boulders. All rehab would be completed cooperatively by Mono County and the BLM. Rehabbed roads and areas would be signed as closed. The BLM would provide the signs and coordinate the sign locations with the county (see Map 4, Potential Rehab Areas).
2. No road construction or maintenance activities would be allowed between May 1 and June 30. Low intensity activities of short duration and limited scale such as rock removal and gate installation may occur if the BLM, in consultation with the CDFW, determines that such activities are not likely to have an adverse effect on nesting sage-grouse.
3. Project activities, including future road maintenance and snow plowing, would be authorized to occur from July 1 to April 30 with the following stipulations:
 - a. From July 1 to August 15, a nest survey would be conducted within 50 feet of any planned vegetation disturbance by a qualified biologist provided by the county, or the BLM, prior to any vegetation disturbance during the migratory bird breeding season. If nests are located, or if other evidence of nesting is observed, a protective buffer would be delineated in coordination with the BLM and the area would be avoided to prevent the destruction or disturbance of nests until they are no longer active. The start and end dates of this seasonal restriction may be altered in coordination with the BLM based on site-specific information such as elevation and winter weather patterns, which could affect breeding chronology and the presence of the species.
 - b. From October 15 to December 15, work may occur if the BLM, in consultation with the CDFW, determines that project activities are not likely to have an adverse effect on migrating or holding mule deer.
 - c. From November 15 to April 30, snow plowing may occur if the BLM, in consultation with the CDFW, determines plowing activities are not likely to have an adverse effect on wintering sage-grouse.

4. Remove old asphalt road base in the eastern most material pit road prior to road improvement unless it can be incorporated into the new road surface.
5. Gravel or road base for road improvement activities would be reviewed and approved by the BLM prior to use to insure the material is clean and free of non-native invasive plants.
6. The installed gates would have a maximum height of 36 inches and be painted flat dark olive green.
7. All equipment and vehicles utilized during road work would be washed or sprayed off prior to entering public land in order to remove any vegetation, seeds, or debris.
8. Turnouts would be placed as designed, but should attempt to utilize previously disturbed areas where practicable in order to minimize new vegetation disturbance.
9. Routine road maintenance would be conducted so as to not cause cast off debris into adjacent vegetation.
10. The BLM would survey the completed road and five feet of the road edge for non-native invasive plants for two growing seasons following completion of the project. Non-native plants would be documented and the amount and coverage would be assessed qualitatively. If non-native invasive plants are present, the BLM would determine if treatment is necessary. If the BLM determines that treatment is necessary, the BLM would work with Mono County on the required plant removal method.
11. If increased vehicle use is observed in the vicinity of the fire station and well, Mono County, the Mono City Fire Department, and the BLM would work together to determine how to reduce this use.
12. Any cultural and/or paleontological resource (historic or prehistoric site or object) discovered by the holder, or any person working on his behalf, on public or Federal land would be immediately reported to the authorized officer (Bishop Field Manager). Holder would suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the authorized officer. An evaluation of the discovery would be made by the authorized officer to determine appropriate actions to prevent the loss of significant cultural or scientific values. The holder would be responsible for the cost of the evaluation. Any decision, as to proper mitigation measures, would be made by the authorized officer after consulting with the holder.

Residual Impacts after Mitigation

The application of all the above mitigation would bring the proposed action **into conformance** with the Bishop RMP and provide a secondary ingress/egress road. Compliance with the RMP through mitigation is described below:

Mitigation Measures for Wildlife Seasonal Protections

- M 2: From May 1 to June 30, sage-grouse nesting protection
- From November 15 to April 30, sage-grouse wintering protection
- From July 1 to August 30, migratory bird breeding season protection
- From October 15 to December 15, migratory mule deer fall protection

Limiting project activities to outside the nesting and wintering periods for greater sage-grouse would remove disturbance related impacts to sage-grouse. With the identified mitigation, the proposed action would conform to Bishop RMP direction to provide Seasonal Protection and Yearlong Protection for sage-grouse. Potential disturbance to sage-grouse would be highly unlikely as project activities would be outside of periods when grouse are likely to use the area. Due to the limited amount of disturbance proposed and because of these timing restrictions, the project is not likely to adversely affect the Bi-State DPS of greater sage-grouse.

This mitigation would remove impacts to nesting migratory birds because activities would take place outside the breeding season for migratory birds or if work is proposed during the breeding season, no work would occur in a buffer around located nests.

Limiting project activities to outside the fall migration period for mule deer would remove disturbance impacts that could lead to metabolic costs the deer would have incurred from avoidance or disturbance during project activities.

No residual impacts from project activities related to disturbance would remain after implementation of these mitigations.

Mitigation Measures for Vegetation

M 1: Rehabilitation of at least 0.30 acres of roads and/or previously disturbed areas would mitigate the impact of the loss of Great Basin mixed scrub vegetation due to the proposed action. However, rehab of previously disturbed areas, such as a well-used road, can be a slow and sometimes difficult process. It is estimated that successful rehab would result in the establishment/re-colonization of perennial grasses and forbs within 1- 5 years following rehab. Early succession shrubs such as rabbitbrush and desert peach would likely begin to establish within 3-10 years. Sagebrush, which is desired for sage-grouse habitat may take upwards of 15-30 years to fully establish.

M 4, 5, 8: These mitigation measures would help minimize the potential for the introduction or spread of invasive non-native plants. Minimizing the introduction and

spread of non-native invasive plants would help prevent adverse impacts to native vegetation as well reduce the risk of increased susceptibility to wildfire. However, treatment options for eradicating cheatgrass (or other annual grasses) are limited.

M 6, 7: Utilizing previously disturbed areas for turnouts and limiting the amount of castoff onto vegetation would help minimize adverse impacts to vegetation.

Overall, portions of the proposed route are already disturbed and the proposed mitigation measures would rehab other disturbed areas and reduce the potential for adverse impacts from non-native invasive plants.

Mitigation Measures for Wildlife Habitat

M 1: Rehabilitation of at least 0.30 acre or more of dirt roads and/or previously disturbed areas.

This mitigation would result in restoration of the same amount of habitat lost as a result of the proposed activities. In the short-term, the rehabbed roads would provide little wildlife habitat, but over the long-term, native vegetation should return, making these areas appropriate habitat for wildlife including mule deer and sage-grouse. No long term residual impacts due to project activities related to habitat loss would remain after this mitigation. The proposed action would meet Bishop RMP direction for Yearlong Protection of sage-grouse habitat Bishop RMP direction to maintain and enhance sage-grouse and mule deer habitat. No residual impacts to habitat would remain after implementation of these mitigations.

M 4, 5, 6, 7: Invasive species and turnout mitigations.

These mitigations would reduce potential adverse impacts to wildlife habitat from the spread of non-native invasive species.

Mitigation Measures for Recreation/Social

M 1: There would be a minor recreational impact as a result of mitigating the shrub vegetation loss due to secondary road construction. This recreational impact would mostly inconvenience individual Mono City residents where unauthorized dirt roads were developed behind their houses and used to access public land to the north and east through the parallel road and through the now closed and rehabbed material pit. Depending on what roads or disturbed areas would be rehabbed, access to public land could still be accomplished through the fire station to the parallel road by using the pipeline corridor or using the dirt road at the end of Mono City to access the parallel road. This may also force users to use paved roads with vehicles prohibited to use such roads due to lack of safety devices or licenses.

Cumulative impacts would not change as a result of mitigation. Although closing various dirt roads that originate from the back yards of a few Mono City residents would

impact those specific residences by reducing convenient access to public land, it is not expected that the access loss would contribute to an overall loss of public access to public lands in the Mono Basin.

B.2. East Side Alternative

Under this alternative the affected environment would be the same as stated under Section B-1 except as stated below, noting that the route location is different for this alternative (see Map 2 and Map 3).

Resource impacts would be the same as under Section B-1, except as stated below.

Vegetation/Threatened and Endangered/Special Status Plants

Vegetation, General

As with the Fire Station alternative, the East Side alternative is also within Great Basin mixed scrub vegetation. The primary difference between the two alternatives is that there is no existing road and the area is not currently disturbed in the area of the East Side route. The vegetation in the vicinity of the East Side route is largely intact. To the west (of the East Side alternative), the nearest road or other vegetation disturbance is nearly ¼ mile away and to the east the nearest road is over a mile away.

Implementation of the East Side alternative would result in the permanent loss of approximately 0.85 acres of vegetation and habitat. All of this would be new disturbance in an otherwise relatively undisturbed area.

There would be a slight positive impact to vegetation and the shrub community due to the rehab of the eastern most material pit road covering 0.5 acres.

The types of impacts from the East Side alternative are similar to those discussed in the proposed action alternative. However, the East Side alternative would result in new vegetation/ground disturbance of more than 2.6 times the area compared to the proposed action alternative. The presence of a new road may have indirect effects to native vegetation aside from, or greater than, those discussed in the proposed action alternative. These include the potential for route proliferation off the new road. Route proliferation would further impact the surrounding vegetation and increase the areas susceptibility to non-native invasive plant infestation.

Special Status Plant Species

See the discussion of Special Status Plants in the proposed action alternative. Impacts would be the same as the proposed action because no Special Status Plants are known to occur in the larger project area.

Invasive, Non-native Plants

See the discussion in the proposed action alternative. The affected environment is generally the same for both alternatives, the primary difference being the location of the East Side route is currently undisturbed.

The effects of the East Side alternative would also be similar to those discussed in the proposed action alternative. However, as discussed above in the General Vegetation section of this alternative, there is no existing road in the area of the East Side route and the area is not currently disturbed. Therefore, implementing the East Side alternative would disturb an approximately 0.85 acres in an area that is an otherwise undisturbed and intact. Generally, areas with native vegetation that is undisturbed and intact are more resistant and resilient to invasion by invasive, non-native plants. Therefore, it is expected that implementation of the East Side alternative would make the area more likely to be negatively impacted by invasive, non-native plants including the potential for increased fire danger. The potential for these adverse impacts to occur is expected to be small, but the potential is greater than that associated with the proposed action alternative.

Wildlife/Threatened and Endangered/Sensitive Species and Habitat

Impacts to wildlife are similar to those in the proposed action, with an increase of approximately 0.85 acres of habitat loss. The primary difference between this alternative and the proposed action is that this area is currently undisturbed and therefore provides habitat that is of higher quality for wildlife. Habitat that is unfragmented by roads or disturbance provides better cover and forage and less exposure to human disturbance. A new disturbance, such as road building, could lead to increased invasive species both in the disturbed area and area adjacent to the disturbance thereby decreasing wildlife habitat quality. Additionally, if this new road led to route proliferation, that would increase the loss of wildlife habitat. Similar to the proposed action, without mitigation, there are no seasonal restrictions to limit disturbance impacts to wildlife and therefore wildlife may avoid the area during project activities. Increased dispersal or avoidance of an area of use could result in increased metabolic costs, which could in turn lead to decreased reproductive success and lower survival.

There would be a slight positive impact to wildlife species and habitat due to the rehab of the 0.5 acres of the eastern most material pit road.

Adherence to Local, State and Federal Environmental Ordinances/Laws

The access road must comply with the County Fire Safe Standards listed in Chapter 22, Land Use Element of the Mono County General Plan. Under the plan, one-way roads shall be a minimum of 10 feet wide and shall not exceed 2,640 feet in length and a turnout shall be placed and constructed at approximately the midpoint of the one-way road. The East Side alternative would have a one-way portion being 2,550 feet long

and a two-way portion being 692 feet long. One turnout is proposed for this alternative. This alternative would meet fire safe standards established by the Mono County General Plan.

Economic Impacts

The proposed action would result in economic impacts at the county level. Mono County would incur all costs for construction, materials, long-term maintenance, and mitigation for the proposed secondary road. The proposed action has been estimated to cost \$41,800 and this estimate does not include mitigation costs which are unknown for potential mitigation rehabilitation. The county has expressed a concern that project cost be contained.

Although there are no cost estimates for this alternative, it would cost more than the proposed action. This alternative would construct 2,550 feet of new road versus 370 feet of new road under the proposed action. It would also require up to 1.35 acres of potential rehabilitation versus 0.30 acres for the proposed action.

Land Uses/Realty/Rights-of-Way

The BLM issued Recreational and Public Purpose (R&PP CACA 000153) lease for the Mono City Fire Station would not have to be amended for this alternative.

Recreation/Social

There would be no impact to recreational users under this alternative.

There would be no increase of recreational use activity through the Fire Station since under this alternative there would be no new road connecting the Fire Station parking lot to the parallel road as part of the secondary access road.

In an emergency event, East Mono Lake Drive, the parallel road to Cemetery road, and the proposed East Side secondary ingress/egress road could be used for evacuation and emergency vehicle access.

In an emergency event where East Mono Lake Drive might be blocked, the proposed East Side Fire Station secondary ingress/egress road could be used for evacuation and emergency vehicle access. Residents and emergency vehicles would use both East Mono Lake Drive and Peeler Lake Drive as entrance and exiting routes leading to the proposed secondary access road. There would be little ability to stage or organize vehicles during an emergency event except for using the existing paved roads for staging.

The west portion of parallel road would most likely not be used since it would be faster and safer to drive down East Mono Lake Drive and to the end of Mono City and then to

the proposed East Side road or to the eastern portion of parallel road and to the county Cemetery road.

Cumulative Effects

The cumulative effects for all resources are similar to those discussed in the proposed action because the effects are similar.

B.2.M. Description of Proposed Mitigation Measures

Mitigation measures for this alternative are the same as for the proposed action except for the following:

1. Close and rehab at least 0.85 acres of dirt roads and/or previously disturbed areas (see Appendix C Potential Rehab Areas) in the immediate local area. In addition, the eastern most material pit road covering 0.5 acre would be rehabbed. The road segments and disturbed areas would be rehabbed by ripping three (3) to six (6) inches deep and would be seeded with native species, chosen in consultation with the BLM. The road segments would be closed at each end with 3-4 foot diameter boulders. All rehab would be completed by Mono County under BLM guidance, and the county would be responsible for all expenses. Rehabbed roads and areas would be signed as closed. BLM would provide the signs and coordinate the sign locations with the county (see Map 4, Potential Rehab Areas).

10. This mitigation would be removed.

Residual Impacts after Mitigation

The application of all the above mitigation would bring the alternative action **into conformance** with the Bishop RMP and provide a secondary ingress/egress road. Compliance with the RMP through mitigation is described in the Proposed Action Residual Impact after Mitigation Section and as stated below.

Vegetation including Invasive Non-Native Plants

See the discussion in the proposed action alternative for vegetation response and residual impacts. Impacts would be similar except the disturbance would be occurring in a currently undisturbed area and therefore the overall impact is expected to be greater.

Wildlife

See the discussion in the proposed action alternative for residual impacts related to wildlife. Impacts would be similar except the disturbance would be occurring in a currently undisturbed area and therefore the loss of this habitat would be more

detrimental to wildlife because it would result in new fragmentation in a previously undisturbed area.

Recreational Use/Social

There would be a minor recreational impact as a result of mitigating the shrub vegetation loss of 0.85 acres due to secondary road construction. This recreational impact would mostly inconvenience individual Mono City residents where unauthorized dirt roads were developed behind their houses and used to access public land to the north and east through the parallel road and through the now closed and rehabbed material pit. Depending on what roads or disturbed areas would be rehabbed, access to public land by certain residents would probably be limited to using the dirt road at the end of Mono City to access the parallel road. In order to meet 0.85 acres of mitigation rehabilitation, all areas in the mitigation rehab area table would have to be used including half of the parallel road. This may also force users to use paved roads with vehicles prohibited to use such roads due to lack of safety devices or licenses.

B. 3. No Action Alternative

Under this alternative the affected environment would be the same as stated under Section B-1. There would be no resource impacts except for the following:

Under the no action alternative, the proposed secondary egress/ingress road ROW would not be issued and the proposed road work would not be completed. The eastern most material pit road would be rehabbed and the road would remain blocked.

In an emergency event where the East Mono Lake Drive might be blocked, Mono City residents would have to evacuate the area using the existing dirt roads to access the parallel road and then proceed east to the county Cemetery road.

It is unknown whether emergency vehicles could or would enter Mono City using other access to provide services or aid.

A component of the Mono County Community Wildfire Protection Plan (CWPP, May 2009) authorized by the Board of Supervisors which calls for a secondary access road for Mono City would not be completed.

Mono City resident's concern for a secondary egress/ingress road would not be remedied.

Vegetation/Threatened and Endangered/Special Status Plants

Vegetation, General

There would be no impact to vegetation because no vegetation removal would occur. In addition, there would be a slight positive impact to vegetation because the eastern most

pit road would be rehabbed with native vegetation covering 0.5 acres.

Special Status Plant Species

The No Action Alternative is expected to have no effect (either positive or negative) on federally listed threatened, endangered, proposed or BLM designated sensitive plants or their habitat because none are known to occur.

Invasive, Non-native Plants

Under the No Action Alternative, there would be no impact either positive or negative to invasive, non-native plants because no action would occur and currently invasive, non-native plants occur only sparingly and are not believed to be impacting the native vegetative communities of the project area.

Wildlife/Threatened and Endangered/Sensitive Species and Habitat

There would be no impact to wildlife species and habitat because no project activities would occur. There would be a slight positive impact to wildlife species and habitat because the eastern most material pit road would be rehabbed with native vegetation covering 0.5 acres.

B.3.M. Description of Proposed Mitigation Measures

No mitigation measures are proposed for this alternative.

Residual Impacts after Mitigation

This alternative would meet the Bishop RMP decisions, guidelines, and plan direction without mitigation.

Cumulative Effects

There would be no identifiable cumulative effects as a result of No Action.

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Triad/Holmes Associates, 2009. Mono City Emergency Access Road, Technical Report, September 2009.

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USDI, US Fish and Wildlife Service. 2013b. 50 CFR part 17. Endangered and Threatened Wildlife and Plants; Designation of Critical Habitat for the Bi-State Distinct Population of Greater Sage-Grouse. October 28, 2013.

Implementation Monitoring:

Bishop Realty Specialist, Botanist, and Wildlife Biologist would monitor the proposed project.

Persons/Agencies Consulted:

Jon Regelbrugge	USFS Inyo NF, District Ranger
Tom Hallenbeck	CalTrans, District 9 Director
Brad Mettam	CalTrans, Deputy District Director Planning
Mark Heckman	CalTrans, Environmental Branch
Rebecca Eastman	CalTrans, SMARA Coordinator
Scott Burns	Mono County, Planning Director
Jerry LeFrancois	Mono County, Planner
Heather DeBethizy	Mono County, Planner
Jeff Walters	Mono County, Public Works Director
Evan Nikirk	Mono County, Past Public Works Director
Nick Criss	Mono County, Compliance Officer
Katie Bellomo	Mono Basin RPAC, Subcommittee Chair
Randy DesBaillets	Mono City, Fire Department Assist Chief
Jim Kirby	Mono City, Volunteer Fire Dept Chief
Attendees	Mono City, Scoping Meeting, May 10, 2011

Preparers:

Greg Haverstock	BLM, Archaeologist
Sherri Lisius	BLM, Wildlife Biologist
Martin Oliver	BLM, Botanist
Kirstin Heins	BLM, Recreation Planner
Larry Primosch	BLM, Realty Specialist
Dale Johnson	BLM, Interagency Fuels Specialist
Alan Taylor	INF/OVD, Interagency Fire Planner

Date: April 3, 2014

Reviewed By: _____ **Date:** _____
/s/ by Heather E. Stone 4/8/2014
Environmental Coordinator

APPENDIX A

PUBLIC SCOPING MEETING NOTES

May 20, 2011

ALTERNATIVES FOR MEETING DISCUSSIONS

- #1 = FIRE STATION ALT
- #2 = EAST SIDE ALT
- #3 = BLUE LAKE ALT
- #4 = CEMETERY ALT
- #5 = GOAT RANCH ALT

ISSUES RAISED

1. WHAT HAPPENS WHEN GATE CLOSES ACCESS NEAR WELL FORCING USE ON ROADS NEAR RESIDENTCES (WESTSIDE FS)
2. ALTERNATIVE SHOULD MINIMIZE VEGETATION/HABITAT LOSS
3. ALTERNATIVE SHOULD MINIMIZE GATES
4. ALTERNATIVE SHOULD MINIMIZE LENGTH
5. ALTERNATIVE SHOULD MINIMIZE COST
6. MINIMIZE ESCAPE TRAVEL TIME AND REDUCE CONGESTION (ALL ROUTES)
7. HOW ALTERNATIVES RATE BASED ON FIRE MOVEMENT (PREDICTION OF FIRE SPREAD AND/OR DIRECTION), REDUCE RISK AND BEST EVACUATION POINT, ESTIMATED TRIAD COST MAY NOT WORK IF USED OR EXPANDED TO ALTERNATIVES (\$/FT)
8. USFS ALTERNATIVE #4 PROVIDES GOOD POINT OF COMMUNICATION, ETC.; PRO/CON; USFS ALTERNATIVE #4 COULD INCREASE CONGESTION
9. ALTERNATIVE S.B. SUPPORTIVE OF FIREFIGHTER/EMERGENCY PERSONNEL, PROTECT PROPERTY (INSURANCE) IN A TIMELY MANNER
10. ROW WILL ENSURE THAT AGREEMENT IN PLACE FOR GATES
11. GATES MAY BE A HAZARD DURING TIME OF INITIAL EVACUATION; OPEN LEADS TO UNSUPERVISED USE, MAINTENANCE PROBLEMS, DAMAGE; LOCKED LEADS TO VEHICLE DAMAGE, POTENTIAL HAZARDS/DANGER
12. LOCKED GATE CAN BE DEFEATED BY DRIVING AROUND
13. ROAD NEEDS SIGNING
14. CERTAIN ALTERNATIVES MAY PRECLUDE CURRENT USE BY LOCALS (CEMETERY AND EASTSIDE (FIRE STATION ALT))
15. POTENTIAL ALTERNATIVE AT WEST OF 859 E MONO LAKE DRIVE (BLUE LAKE ALT);
16. BLUE LAKE ALTERNATIVE NOT FEASIBLE DUE TO PRIVATE PROPERTY REFERS TO #15
17. PIT RECLAMATION COULD BE AFFECTED BY ALT 3 (BLUE LAKE ALT) THAT USE PIT LOCATION (ROADS)
18. ALTERNATIVE 1 (FIRE STATION) AND ALT 3 (BLUE LAKE) REQUIRE CALTRANS RECLAMATION PLAN TO BE AMENDED
19. ENSURE ROUTE IS CONSTRUCTED TO USE , SAFE, PROVIDES VISIBILITY
20. ALTERNATIVE SHOULD ALLOW FASTEST RESPONSE FROM SURROUNDING COMMUNITIES
21. IF ALTERNATIVE 2 (EAST SIDE ALT) SELECTED, MAINTAIN ACCESS FROM PRIVATE PROPERTY TO CEMETERY ROAD; GATE NORTH OF CEMETERY ROAD, REDUCE TO 2 GATES TO ALLOW EXISTING USE
22. Goat Ranch Alternative from CalTrans 5-6-2011 letter and voiced at meeting

APPENDIX B

Mono City Fire Road - Fire Behavior Report - June 2012

Fire History

Since 1970 there have been 41 documented wildland fire ignitions within 5 miles of Mono City. 23 (56%) were lightning caused. Fires occurred April through December with June, July and August being the busiest months. 8 fires exceeded 1/2 acre in size while most (66%) were less than 1/10th acre. No fires occurred in Mono City itself. The largest (Lundy Fire – 740 acres – down power line) burned during a wind event on April 4, 2003 and was contained later that day. Same day containment is common due to patchy fuels, relatively flat topography and ease of access for nearby suppression resources. Cheatgrass is making fuels more continuous.

Figure 1. Fires within 5 miles of Mono City by Month, Cause and Size (1970-2011)

Month	Total Fires		Size Class (Acres)									
			A (<0.1)		B (0.1-10)		C (10-100)		D (100-300)		E (300-1000)	
	# of Fires	% of Fires	Lightning	Human	Lightning	Human	Lightning	Human	Lightning	Human	Lightning	Human
April	2	5%		1								1
May	1	2%					1					
June	9	22%	5	2	1		1	1				
July	13	32%	8	2	2		1	1				
August	9	22%	2	3	1	1		1	1			
September	2	5%			1		1					
November	4	10%			3		1					
December	1	2%						1				
Total	41	100%	15	8	8	1	5	4	1	0	0	1

Fire Behavior

Most large fires in the Mono Basin are wind driven. Wind events associated with frontal passage are common from October through May and occasional in June and August. SSW is the most commonly observed wind direction and topography, generally, does not alter wind speed and/or direction except for erratic winds near canyon mouths. Fuels are typically very dry during fire season and fires will respond quickly to wind shifts, gusts and changes in topography. Live fuels green up in May, reach peak fuel moisture in July and are dormant by mid-October. Most precipitation falls as snow and fuels may be snowbound November-March. Thunderstorms may have enough rain to extinguish fires. Thermal lows develop in the Mono Basin during the summer and low level atmospheric instability may be observed on otherwise stable days. This can increase fire behavior.

Behave Outputs using typical late-summer thresholds for Fuel Model SH4 (Brush):

Inputs: Relative Humidity = 21%,
 Temperature = 80°
 10-hour Dead Fuel Moisture = 6%
 Live Fuel Moisture = 60%
 Slope = 0%

MidFlame Wind Speed	Rate of Spread (ch/hr)	Flame Length* (feet)
4.2 mph	37	8.3
10 mph	118	14.2

*Flame Lengths up to 4 feet may be attacked with handtools, beyond 8 feet can be difficult to control even with hoselays.

Prepared by Alan Taylor, Interagency Fire Planner (INF/OVD)

APPENDIX C

**Mono City Local Area
Potential Mitigation Rehab Areas**

<u>Location - See Map 4</u>	<u>Length x Width</u>	<u>Square Ft.</u>	<u>Acres</u>
Pit Road Diagonal Ext. #1	769' x 8.5'	6,537 sq ft	0.15
Pit Road North/South Ext. #2	592' x 9'	5,328 sq ft	0.12
Well Road-Pipeline Corridor #3	273' x 10'	2,730 sq ft	0.06
Disturbed Area North Side #4	Varying	7,600 sq ft	0.17
Parallel Road #5	4,095' x 6.5'	<u>26,617 sq ft</u>	<u>0.61</u>
	Total	48,812 sq ft	1.11 Ac