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YOLO COUNTY PARKS & RESOURCES
DEPARTMENT

**GRANITE
CONSTRUCTION
COMPANY** SINCE
1922

NORTHERN CALIFORNIA

November 26, 2007

Mr. Warren Westrup
Yolo County Parks and Resources Dept.
120 W. Main Street, Suite C
Woodland, CA 95695

**SUBJECT: Supplemental Submittal for Esparto Mining and Reclamation Project
Application Package**

Dear Mr. Westrup:

Granite Construction Company has received your November 9, 2007 completeness review letter. We appreciate your timely review of our proposed application package. This letter is intended as a response to your requests for additional information. For your convenience, we have provided the checklist used in your letter and have included the County's request (in *italics*) followed by Granite's response. We respectfully submit the following responses:

Mining Permit Application Requirements

1. **Ten complete copies of the application (10-4.502)**
County response: Received.
Granite response: Ok.
2. **Executive Summary and table of contents (10-4.502)**
County response: Received.
Granite response: Ok.
3. **Narrative description of the proposed operations (10-4.502(a))**
County response: Received.
Granite response: Ok.
4. **Consistency of proposal with County plans and regulations (10-4.502(a)(1))**
County response: The second paragraph of the project description contains a brief conclusory statement that the project is designed to be consistent with the OCMP and related ordinances but does not appear to include any information supporting the conclusion. More information is needed. Please submit this in the form of a checklist.

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Granite response: Resolution 96-117 of the Board of Supervisors amended the Yolo County General Plan to include the Off-Channel Mining Plan (OCMP). Please refer to Section 2.3, Existing Setting and Land Use, of the Project Description for a discussion of consistency with the OCMP and Zoning Code. The Project is not located within a Specific Plan area.

5. Waste and overburden disposal; contamination control during operation (10-4.502(a)(2))

County response: Received.

Granite response: Ok.

6. Surface water drainage and erosion control methods, including 100-year flood protection (10-4.502(a)(3))

County response: Within the project description there does not appear to be any discussion of 100-year flood protection. Please submit this information.

Granite response: The Cache Creek Hydraulics Study prepared by Cunningham Engineering (Appendix C of the application package - attached to Exhibit 1 of this supplement) demonstrates that the Project area is outside the 100-year flood plain in existing conditions. Implementation of the proposed bank stabilization project will provide additional protection for the Esparto bridge (proposed as a net gain to Yolo County) and from a 100-year event. The bank stabilization project will consist of construction of a stabilized bank along Cache Creek and a fill behind the bank to provide additional stability. Exhibit 1, attached, also includes the Granite Construction Cache Creek Streambank Stabilization Plans prepared in November 2007 by Cunningham Engineering.

7. Hours of operation and proposed nighttime operations (10-4.502(a)(4))

County response: Please provide additional information summarizing proposed nighttime operations. Requested frequency is not clear.

Granite response: Because future contract requirements cannot be accurately predicted, the number of days operations would occur at night cannot be reasonably estimated. Granite is requesting the ability to operate 24 hours per day as necessary providing conformance with Section 10-4.421, Noise General Standard, of the OCMP, is achieved. This request is consistent with the discussion in the October 17, 2002 Planning Commission Staff Report prepared for the adjacent Capay operation. Page 6 of the Staff Report is attached for your convenience (Exhibit 2).

8. Soil test borings; soil quality; slope stability (10-4.502(a)(5))

County response: It is not clear whether The Soil Evaluation Report and Reclamation Plan satisfies Section 10-4.502(a)(5) of the County Mining Ordinance. Please revise the report or provide supplemental information as necessary to address this requirement.

Granite response: Soil borings within the mining areas are located in Appendix A of the Hydrogeology Report of Findings (Application Package Appendix B). These test borings are incorporated by reference in the Slope Stability Study prepared by Wallace Kuhl and Associates (Application Package Appendix I).

9. Quantity and type of materials; maximum annual production; tons mined; tons sold (10-4.502(a)(6))

County response: Received.

Granite response: Ok.

10. Phasing table (10-4.502(a)(7))

County response: Information regarding Williamson Act does not appear to be provided. Please provide this information.

Granite response: Approximately 286 acres are under Williamson Act Contract #69-331, pertaining to Assessor Parcel Number 048-220-221 (formerly a portion of APN 048-220-14). A Notice of Non Renewal was filed by the previous landowner on November 25, 2003.

11. Biological inventory and analysis; wetlands delineation; biological analysis of proposed landscaping plan (10-4.502(b)(1))

County response: Received.

Granite response: Ok.

12. Groundwater analysis; groundwater monitoring program; well survey (10-4.502(b)(2))

County response: The hydrogeological (ground water) report does not appear to satisfy Section 10-4.427 of the Mining Ordinance. Please clarify and/or provide supplemental information if necessary.

Granite response: There are no off-site municipal wells located within 1,000 feet, nor are there off-site domestic wells located within 500 feet of the proposed wet pit mining boundary. Prior to excavating within 500 feet of the on-site domestic well, domestic use of this well will cease.

13. Noise analysis; noise contours (10-4.502(b)(3))

County response: Received.

Granite response: Ok.

14. Traffic analysis (10-4.502(b)(4))

County response: The traffic study does not appear to address the structural conditions for existing roadways that comprise the proposed haul routes. Also, the analysis of impact on these roadways needs more detail.

Granite response: The Off-Channel Surface Mining Ordinance (Section 10-4.502(b)(4)) does not appear to require an analysis of structural conditions for existing roadways. TRC has conducted a field survey to evaluate the general road conditions for segments of County Roads 19 and 97 that are proposed as the Esparto Project haul routes, consistent with the ordinance requirement and previous submittals at the neighboring Capay facility. Please see Exhibit 3, attached.

Nevertheless, Granite has prepared an analysis of structural road conditions for County Road 87. A structural pavement distress table, with associated boring data, is also included in Exhibit 3. County Road 19 is structurally adequate to support gravel truck traffic, as evidenced by past and current operations.

The traffic analysis includes significance criteria and identifies deterioration of roadway pavement as a potentially significant impact. A mitigation measure, consistent with the OCMP and mitigation incorporated in previous actions taken at the neighboring Capay facility, is provided to mitigate this impact to a level that is less than significant. Additional discussion of impacts, if necessary, may be provided in the Environmental Impact Report prepared for the Project.

15. Geotechnical study (10-4.502(c)(5)) [sic] (b)(5)

County response: The slope stability study does not appear to address flood protection from Cache Creek or maintenance.

Granite response: Flood protection from Cache Creek would be provided by the implementation of the bank stabilization plan proposed as a net gain. The construction as per specifications on the plans (see Exhibit 1) utilizing Slope Stability Reports prepared by Wallace Kuhl Associates dated June 20, 2001 (Job #3080.05) and August 9, 2007 (Job #5871.06) will prevent breaching or pit capture. Annual inspection and maintenance are normal components of bank stabilization projects.

16. Cultural resources survey (10-4.502(b)(6))

County response: The cultural resources survey does not appear to address paleontological resources which are known to occur in the area. This information will be needed in order to satisfy CEQA requirements.

Granite response: An intensive pedestrian survey was conducted for the subject property which did not identify any on-site paleontological resources. Page 23 of the cultural resources survey provides a measure to mitigate for any unanticipated discovery of paleontological or other cultural resources. The mitigation measure is taken verbatim from Section 10-4.410(b) of the Surface Mining Ordinance.

17. Engineering analysis for proposed excavations within 700 feet (10-4.502(b)(7))

County response: This information does not appear to be provided in the application submittal, including information required under Section 10-4.429 of the Mining Ordinance.

Granite response: Cunningham Engineering provided a response to this item in a November 16, 2007 letter to Granite Construction (see Exhibit 1).

18. Engineering analysis of 100-year flood event potential (10-4.502(b)(8))

County response: This information does not appear to be provided in the application submittal, including information required under Section 10-4.416 of the Mining Ordinance.

Granite response: Cunningham Engineering provided a response to this item in a November 16, 2007 letter to Granite Construction (see Exhibit 1).

19. Mining plans for site with minimum required information (10-4.502(c)(1-8))

County response: Please provide an affirmative statement that items 1 through 8 are depicted on the Site Plan submittal.

Granite response: Cunningham Engineering provided a response to this item in a November 16, 2007 letter to Granite Construction (see Exhibit 1).

Please refer to Project Description Figure 3, Existing Conditions Aerial Photograph, for the location of existing vegetation. All on-site vegetation within the mining and processing areas will ultimately be removed as part of proposed operations.

20. Cross-sections with minimum required information (10-4.502(d)(1-3))

County response: Cross-sections are referenced on mining sheet #1 but not provided.

Granite response: Please see attached Mining and Reclamation Plan Cross-Sections (Exhibit 4).

21. Surveyor of civil engineer certificate (10-4.502(e))

County response: Received.

Granite response: Ok.

22. Record of survey (10-4.502(f))

County response: Received.

Granite response: Ok.

23. Initial environmental assessment (10-4.502(g))

County response: Received.

Granite response: Ok.

24. Applicable discretionary permits (10-4.502(h))

County response: Received.

Granite response: Ok.

25. Net gains proposal (10-4.502(i))

County response: Received.

Granite response: Ok.

26. County application forms (10-4.502(j))

County response: Received.

Granite response: Ok.

Reclamation Plan Application Requirements

1. Ten complete copies of application (10-5.601)

County response: Received.

Granite response: Ok.

2. Executive summary and table of contents (10-5.601)

County response: Received.

Granite response: Ok.

3. Narrative description of the proposed reclamation (10-5.601(a))

County response: Received.

Granite response: Ok.

4. Consistency of proposal with County plans and regulations (10-5.601(a)(1))

County response: Received.

Granite response: Ok.

5. Contamination control after reclamation (10-5.601(a)(2))

County response: Received.

Granite response: Ok.

6. Rehabilitation of affected streambed channels and streambanks to minimize erosion (10-5.601(a)(3))

County response: Received.

Granite response: Ok.

7. Effect of proposed reclamation of future mining (10-5.601(a)(4))

County response: Received.

Granite response: Ok.

8. Reclamation phasing table and required statement (10-5.601(a)(5))

County response: Received.

Granite response: Ok.

9. Demonstration of compliance with minimum performances standards in the State Reclamation Regulation and Article 5 (10-5.601(a)(6))

County response: Received.

Granite response: Ok.

10. Implementation responsibility statement (10-5.601(a)(7))

County response: Received.

Granite response: Ok.

11. Reclaimed use acreages (10-5.601(a)(8))

County response: Received.

Granite response: Ok.

12. Surface water drainage and erosion control methods, including 100-year flood protection (10-5.601(a)(9))

County response: Received.

Granite response: Ok.

13. Maximum land disturbance (10-5.601(a)(10))

County response: Received.

Granite response: Ok.

14. Williamson Act information (10-5.601(a)(11))

County response: The information provided does not appear to identify "prime farmlands" as required.

Granite response: Please refer to Appendix A, Soils Evaluation Report and Reclamation Plan, for identification of the site's approximately 104 acres of prime agricultural land. The study utilizes the Natural Resources Conservation Service (NRCS) methodology for classification of prime lands, consistent with previous submittals and actions taken at the neighboring Capay facility.

15. Mining information (10-5.601(b)(1-6; and 8)) [sic] 10-5.601(d)(3)

County response: The location and condition of previously mined areas of the site need to be provided.

Granite response: The location and condition of previously mined areas of the site is depicted on Exhibit 5.

16. Regional and site geological information (10-5.601(b)(7))

County response: Received.

Granite response: Ok.

17. Biological analysis of proposed revegetation, including cross-sections (10-5.601(c)(1))

County response: Received.

Granite response: Ok.

18. Soil analysis for agricultural reclamation; top soil and overburden information; groundwater information (10-5.601(c)(2))

County response: It is not clear whether all items are provided. Cross-sections, field irrigation slope grades, detention basin information, and groundwater relationship do not appear to be addressed.

Granite response: Please see attached Mining and Reclamation Plan Cross-Sections (Exhibit 4). Field irrigation slope grades for agricultural reclamation are designed consistent with the existing field grades, which are just under 0.5%. The size and location of an agricultural detention basin is to be determined by the tenant farmer at the time of final field leveling. Groundwater relationships are shown on the Reclamation Plan Cross-Sections, sheet 10 of 13 (see Exhibit 4), and will have greater than the 5 feet of separation as required by the County Ordinance.

19. Geotechnical study addressing stability and maintenance of proposed final slopes (10-5.601(c)(3))

County response: The slope stability study does not appear to address maintenance.

Granite response: A slope stability report has been prepared to ensure the long-term stability of slopes and demonstrates a slope stability factor of safety suitable for the proposed end use. Slopes will be vegetated to prevent erosion per the Habitat Restoration and Landscape Visual Screening Plan, and requirements of SMARA addressed under the Reclamation Plan. Slopes will be maintained on a continuous basis throughout the life of the operation and revegetation success criteria have been set forth in these plans. If the operator or County determines, upon inspection, that slopes require additional maintenance, then site specific maintenance activities would be performed at that time.

20. Reclamation plans for site with minimum required information (10-5.601(d)(1-9))

County response: The location and condition of previously mined areas of the site need to be provided.

Granite response: The location and condition of previously mined areas of the site are provided in Figure 6 (attached as Exhibit 5).

21. Cross-sections with minimum required information (10-5.601(e)(1-3))

County response: Cross-sections are referenced on reclamation sheet #1 but not provided.

Granite response: Please see attached Reclamation Plan Cross-Sections (Exhibit 4).

22. Surveyor or civil engineer certificate (10-5.601(f))

County response: Received.

Granite response: Ok.

23. Estimate of financial assurances (10-5.601(g)(1-4))

County response: It is not clear whether all items are addressed. Average distance from soil stockpiles to areas being reclaimed does not appear to be provided.

Granite response: Please see page 7 of Financial Assurance Estimate, Calculation Basis and Other Miscellaneous Information. An average haul distance of 2,000 linear feet (one-way) is provided, which is very conservative based on location of stockpiles.

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24. Record of survey (10-5.601(h))

County response: Received.

Granite response: Ok.

25. Initial environmental assessment (10-5.601(g))

County response: Received.

Granite response: Ok.


26. Applicable discretionary permits (10-4.502(h))

County response: Received.

Granite response: Ok.

Thank you again for your time and consideration in this matter. The submittal of this additional information should fulfill the requirements of a complete application package pursuant to the Yolo County Off-Channel Mining Plan. For questions pertaining to the application, please call Ben Adamo at (916) 257-8967 or me at (916) 855-4471.

Regards,
GRANITE CONSTRUCTION COMPANY



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cc: Kent Reeves
Mike Hedding
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Ben Adamo