7.1 NOTICE OF PREPARATION (NOP), WRITTEN COMMENTS AND SUMMARY OF SCOPING MEETING

NOTICE OF PREPARATION
NOTICE OF SCOPING MEETING

TO:

FROM: Yolo County Community Development Agency
292 West Beamer Street
Woodland, CA 95695

DATE: December 29, 1995

SUBJECT: **NOTICE OF PREPARATION and NOTICE OF SCOPING MEETING FOR THE CACHE CREEK RESOURCES MANAGEMENT PLAN PROGRAM-LEVEL (CCRMP) ENVIRONMENTAL IMPACT REPORT (EIR)**

LEAD AGENCY: County of Yolo
Community Development Agency
Woodland, CA 95695

CONTACT: David Morrison, Resource Management Coordinator

The County of Yolo has determined that a program-level Environmental Impact Report will be prepared for the **CACHE CREEK RESOURCES MANAGEMENT PLAN (CCRMP)**. The County of Yolo will be the lead agency and will need to know the views of your agency as to the scope and content of the EIR based on your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use this EIR when considering relevant permits or other approvals for the project. The County is also seeking input from residents, property owners, and concerned citizens as to the issues that should be addressed in the EIR. The project description is summarized below. A meeting to discuss the appropriate scope of the EIR has been scheduled, as indicated below.

PROJECT DESCRIPTION: The CCRMP represents the second of two key plans that County staff has prepared to manage the resources of the mining reach of Cache Creek. The CCRMP addresses a variety of issues relevant to managing the diverse resources within the creek channel. The other key plan is the Off-Channel Mining Plan (OCMP) which focuses on sand and gravel extraction outside the creek channel. The draft OCMP was released on October 30, 1995. Though they will be stand-alone plans, it is proposed that the final OCMP and CCRMP be joined together after adoption, as one printed document entitled the Cache Creek Area Plan.

The draft CCRMP is organized into an Introduction and six "elements" including a Floodway and Channel Stability Element, a Water Resources Element, a Biological Resources Element, an Open Space and Recreation Element, an Aggregate Resources Element, and an Agricultural Resources Element.

Each element has an introduction, a list of goal statements, identified objectives and actions, and performance standards. Key recommendations of the plan include:

- Redefinition of the in-channel/off channel boundary based on the present (1994) channel bank line or the U.S. Army Corps of Engineers' Westside Tributaries Study 100-year flood elevation, whichever is wider.

- Limitations on the amount of aggregate removed from the channel to the average amount of sand and gravel deposited during the previous year (approximately 200,000 tons on average), except where bank excavation is necessary to widen the channel, or where potential erosion and flooding problems exist.
- Implementation of the Test 3 Run Boundary described in the Technical Studies as the preferred conceptual morphology of Cache Creek.
- Replacement of the theoretical thalweg with specific channel slope standards specific to each reach of the creek.
- Creation of a Technical Advisory Committee (TAC) to review annual monitoring data and provide recommendations and feedback to the County with regard to the conditions of the creek and streamway influence zone.
- Ten-year updating of the CCRMP to account for the results of the annual monitoring program, reshaping and maintenance efforts (creek improvement projects), and changing responses of the creek.
- Rezoning those lands within the Test 3 Run Boundary with an S-G (Sand and Gravel) Zone overlay to allow for those excavations necessary to carry out the channel modifications envisioned in the Technical Studies, as well as any regular and/or emergency flood control and bank protection activities.
- Encouragement of riparian woodland restoration projects in appropriate areas within the Cache Creek channel.
- Creation of a continuous riparian habitat corridor along Cache Creek.
- Future development of a Parkway Plan for Cache Creek to provide for a range of public activities and uses.
- Establishment of the County as the primary operator in the creek, utilizing general creekwide permits from state and federal authorities, to enable implementation of the proposed maintenance mining and monitoring program.
- Implementation of the CCRMP through primarily volunteer, cooperative efforts of private, non-profit, and public entities.

DESCRIPTION OF ALTERNATIVES: The project alternatives that will be examined in the EIR will include the following:

Alternative #1a: No Project (Existing Conditions)

Under this alternative the County would not adopt the CCRMP. Mining would continue based on 1995 actual production for each producer. Continuation of all regulations in place as of December 31, 1995 would be assumed, including the 1979 regulatory channel boundary and existing "interim" regulations. Assumptions for overall extraction would be determined based on 1995 in-channel production.

Alternative #1b: No Project (Existing Permits and Regulatory Condition)

Under this alternative the County would not adopt the CCRMP. Currently approved maximum annual allocations would establish the maximum intensity of mining that would be allowed. It would be assumed that all regulations in place as of December 31, 1995 would remain in place, including the 1979 regulatory channel boundary and existing "interim" regulations. Assumptions for individual producers would be as follows:

Cache Creek Aggregates	748,650 tons mined per year in-channel
Granite Construction	422,352 tons in-channel (less than one year of remaining reserves)
Solano Concrete Company	772,417 tons per year in- or off-channel
Teichert (Esparto)	750,000 tons per year off-channel
Teichert (Woodland)	1,064,224 tons per year off-channel
Schwarzgruber and Son	114,000 tons per year in-channel
Syar Industries	960,871 tons per year in-channel

Alternative #2: No Mining (Alternative Site)

Under this alternative, the County would not adopt the CCRMP, and would not take a pro-active role in managing the creek. Individual property owners would continue to have responsibility for erosion control or other activities within the creek. It would be assumed that

existing permits to mine for all producers would be voided as of December 31, 1995. Mining would occur elsewhere and be trucked into the County in response to market demand. Market demand for the County would be assumed at 271 million tons over the next fifty years, or approximately 5.4 million tons per year based on interpolations of the State Geologist's estimates. This alternative would examine the potential for satisfying local demand from reserves of PCC-grade aggregate material known to occur in dredger tailings east of Yuba City and Marysville, alluvium deposits underlying Mather Air Force Base in the Rancho Cordova area of Sacramento, sand and gravel deposits from other Sacramento operations, and alluvial deposits and tailings from Folsom.

Alternative #3: Channel Bank Widening (Implement Streamway Influence Boundary)

Under this alternative, the CCRMP would establish a wider channel similar to the streamway influence boundary which describes the historical width of the creek. Local bridge structures would be extended to span the historical creek width. Commercial mining within the creek would be prohibited and the natural forces of the creek would be allowed to occur without active management (e.g., erosion control). Flood easements to accommodate this alternative would have to be acquired. Off-channel mining, outside the streamway influence boundary and some appropriate buffer, would be allowed.

AREAS OF POTENTIAL IMPACT: This will be a program-level environmental analysis, from which later project-level EIRs for individual mining permits will tier. It is anticipated, that this CEQA analysis will be focused on the following issue areas:

Land Use and Planning

Identification of relevant regulatory setting. Comparison and discussion of SMARA and related mining regulations, the County General Plan, and other existing County plans, policies, and ordinances in force within the County which govern mineral resource extraction within the project and surrounding areas. Examination of compatibility with existing and planned land uses in the area, as the OCMP and CCRMP are implemented over time. Discussion of cumulative land use issues associated with implementation of the OCMP and CCRMP. Examination of the potential for impacts associated with the proposed changes in the in-channel and off-channel boundaries.

Geology and Soils

Identification of regional and study area geological and seismic setting information. Identification of creek morphology including stream capture and channel stability). Identification of soils and aggregate resources. Identification of relevant regulatory setting for geology and soils issues. Discussion of the potential for impacts associated with geological problems, erosion, changes in topography during mining and after reclamation (particularly finish elevations post-reclamation), improvements to soils proposed by reclamation, loss of soils, use of non-renewable mineral resources, and impacts to future mineral resource availability. Discussion of cumulative geological and soils issues associated with implementation of the Plans. Analysis of the impacts associated with the initial proposed channel reshaping and subsequent periodic controlled maintenance, versus the current situation. Determination of specific interim "corrective" mining projects (to accomplish channel shaping and smoothing) as mitigation measures that would further implement the goals and performance standards of the OCMP and CCRMP, beyond those identified in the Plans themselves. The Program EIRs will need to examine the potential for impacts associated with the proposed changes in the in-channel and off-channel boundary, and the impacts associated with the initial channel reshaping and subsequent periodic controlled maintenance, versus the current situation.

Hydrology and Water Quality

Identification of regional and study area hydrologic setting information including climate surface water, runoff and drainage, flooding, infiltration, groundwater, evaporation and evapotranspiration, and water quality (various data sources including earlier certified EIRs, the EIRs on the short-term permits, and the Technical Studies). Identification of relevant regulatory setting for hydrology and water quality issues. Discussion of the potential for impacts associated with changes in absorption, drainage patterns, surface water runoff, flooding, groundwater recharge, degradation of water quality, contamination of water supply, channel capacity, direction or rate of flow of groundwater, hydraulic structure, or watershed. Discussion of cumulative hydrology and water quality issues associated with implementation of the Plans. Determination of specific hydrology and water quality mitigation projects that could further implement the goals and performance standards of the OCMP and CCRMP, beyond those identified in the Plans themselves. Examination of consistency with efforts of the Regional Water Quality Control Board, and applicable "basin" plans.

Agriculture

Identification of regional agricultural resources, crop history, productivity, designated farmland, soil types, and land subject to Williamson Act contracts (data sources include previous studies and EIRs, UCD and Agricultural Commissioner reports). Identification of relevant regulatory setting for agricultural issues. Economic or other issues associated with non-renewal of Williamson Act contracts under the County's current zoning requirements may be relevant as contrasted with the recommendation to allow mining within the A-P zone.

Discussion of the potential for impacts associated with changes in productivity and crop value, permanent conversion of agricultural lands (prime and non-prime) to other uses, temporary conversion (prime and non-prime), risk of cold injury, and stockpiling of soils for reclamation. Discussion of cumulative agriculture issues associated with implementation of the OCMP and CCRMP. Constraints to agriculture reclamation associated with soils, land use compatibility, post-reclamation compatibility and other related issues should be addressed. Examination of relationship to Resource Conservation District agricultural policies.

Biological Resources

Discussion of regional and study area biological setting. Identification of biological resources including vegetation, wetlands, fish and wildlife, and special-status species. Identification of relevant regulatory setting for biological resources, including 2081 mitigation requirements. Discussion of potential for impacts associated with loss of habitat, change in species population or diversity, special status species, loss of oak trees, and creation of barriers to migration, movement, or normal replenishment. Discussion of cumulative biological issues associated with implementation of the OCMP and CCRMP. Determination of specific habitat restoration mitigation projects that could further implement the goals and performance standards of the OCMP and CCRMP, beyond those identified in the Plans themselves. Examination of consistency with the County Memorandum of Understanding and Habitat Management Plan efforts, and any other applicable "recovery" plans for listed species.

Air Quality

Discussion of regional and study area air quality setting including climate and topography, ambient air quality, and relevant regulatory requirements (regional standards and planning efforts). Discussion of the potential for impacts associated with changes in air quality, exposure of sensitive receptors to air and dust, cumulative emissions from mining and hauling, combined air quality impacts from various proposed mining methods based on proposed annual operations and phasing, cumulative emissions from aggregate processing, cumulative emissions from asphalt processing, increases to existing cumulative air quality concerns, potentially hazardous emissions, localized versus regional effects, emissions associated with reclamation, and emissions associated with post-reclamation operations. Discussion of cumulative air quality issues associated with implementation of the Plans. Examine the extent to which adoption of the OCMP and CCRMP would affect attainment of local, state, regional, or federal air plans.

Traffic and Circulation

Identification of regional and study area transportation network and existing traffic conditions (counts for certain study area roadways will be available from the County and Caltrans), including existing safety hazards/conflicts, accident data, level of service, haul routes, and potential truck traffic under existing approvals and permits. Identification of relevant regulatory setting for traffic and circulation issues. Discussion of the potential for impacts associated with increases in volume and location of mining, changes in haul routes, cumulative hauling, changes in the nature of traffic impacts based on the period and phasing of mining proposed, the period and phasing of reclamation proposed, and post-reclamation traffic and circulation. Discussion of cumulative traffic and circulation issues associated with implementation of the Plans. Discussion of potential employer and vendor traffic generation.

Noise

Identification of regional and study area noise setting information. Identification of relevant regulatory setting for noise issues. Identification of impacts associated with noise from operations and hauling, changes in ambient noise characteristics, and effects on sensitive receptors. Discussion of cumulative noise issues associated with implementation of the OCMP and CCRMP.

Aesthetics

Identification of regional and study area aesthetic and visual setting (including typical farming and agricultural practices, and the phasing of these practices and activities over the course of a year). Identification of existing community aesthetic issues associated with reclamation of previous mining areas under earlier SMARA requirements. Identification of cumulative aesthetic issues associated with implementation of the OCMP and CCRMP, proposed mining, intensity, methods (e.g. nighttime operations), and phasing of mining, proposed reclamation activities, and post-reclamation activities. Discuss the potential for impacts in all of these areas. Discuss aesthetic impacts associated with implementation of the OCMP and CCRMP over the short- and long-term. Determination of specific mitigation projects at sites reclaimed under earlier SMARA requirements that could further implement the goals and performance standards of the OCMP and CCRMP, beyond those identified in the Plans themselves.

Cultural Resources

Identification of regional and study area cultural resources setting information including paleontological, archeological, historical, and cultural resources. Identification of relevant regulatory setting information for cultural resource issues. Discussion of the potential for

disruption or modification of cultural resources from implementation of the OCMP or CCRMP, or from the cumulative effects of proposed mining. Consultation with the Office of Historic Preservation and any other related necessary consultation.

Hazards

Identification of existing regulatory requirements related to risk of upset and hazardous materials. Identification of potential for release of hazardous substances and/or increased exposure of people to existing sources of potential health hazards. Discussion of relevant cumulative issues.

Public Services and Utilities

Identification of relevant setting information and potential for impacts associated with recreation, groundwater supply (recharge), surface water distribution (canal/recharge system), maintenance of public roads, and other governmental services. Mitigation should examine the feasibility of a mitigation fee for long-term monitoring of mining operations and reclamation, and a mitigation fee for long-term road maintenance.

Other

Thresholds for significance will be identified for each issue area, and used to reach conclusions regarding impact. For all areas of impact identified in the program EIR, relevant mitigation measures must be identified to fully or partially mitigate the impact, to the degree feasible. These measures shall be written so that appropriate participation by individual operators can be clearly identified in the project-level EIRs. Previous EIRs and technical studies shall be used as an initial source of data and potential mitigation measures. Where the most appropriate program-level mitigation is a modification in the OCMP or CCRMP, or the addition or modification of goals, performance standards, or other requirements, this shall be so identified.

INITIAL STUDY: The County has determined that an EIR is clearly required for this project, and has therefore opted to conduct no further initial review pursuant to Section 15060(c) of the CEQA Guidelines. Instead the County will begin work directly on the EIR process as described in Article 7 of the Guidelines, commencing with Section 15080. As required, the EIR will focus on the significant effects on the project, however, the report will document reasons for determining that other effects would not be significant or potentially significant.

SCOPING MEETING: A public scoping meeting has been scheduled for Monday, January 15, 1996 at 6:30 pm at the Planning Commission Chambers at 292 West Beamer Street in Woodland, CA 95695. The purpose of this meeting is to receive comments regarding the appropriate scope of the EIR and also to solicit public suggestions regarding scope of the analysis of alternatives to the project. If you have questions or need additional information please contact David Morrison at 916-666-8020 or Heidi Tschudin at 916-447-1809.

RESPONSES: Due to the time limits mandated by State law, your response to this notice must be sent at the earliest possible date but not later than 30 days after receipt. Based on our mailing, this 30 day period will run from **January 5, 1996 through February 3, 1996**.

PLEASE SEND YOUR RESPONSES TO: David Morrison, Resource Management Coordinator at the address shown above. Please remember to include in your comments the name of the contact person in your agency. We will be pleased to answer your questions. Please contact David directly at (916) 666-8020 or Heidi Tschudin, Contract Planner at (916) 447-1809 should you need more information.

Date _____ Name _____

Signature _____ Title _____

Telephone _____

Reference: CEQA Guidelines Sections 15082 (a), 15103, 15375.

Gus Yates
655 J Street
Davis, CA 95616
5 October 1989

Yolo County Water Resources Board
c/o Yolo County Department of Public Works
292 West Beamer Street
Woodland, CA 95695

Re: New Cache Creek gravel mining alternative

Dear Water Resources Board:

In recent conversations with county staff and concerned citizens, I have sensed a need to develop a reasonable proposal for gravel mining in the Cache Creek area. No one, it seems, is very enthusiastic about the alternatives described in the draft Resources Management Report prepared by Dames & Moore, Ltd. The effort and expense invested in the EIR process will be wasted if none of the alternatives evaluated are acceptable to the majority of citizens and interest groups in Yolo County.

The enclosed draft proposal is a step toward developing an acceptable alternative. It attempts to strike a reasonable balance among several key resources: agricultural land, aggregate production, wildlife habitat, and water supply. It also incorporates design features that work with rather than against natural fluvial processes.

I am soliciting comments on this draft from a number of interest groups. I plan to reconcile the comments (if possible!) and incorporate them into a revised draft in time for the public EIR workshop on November 8. I would very much appreciate your ideas and reactions to the enclosed draft. Feel free to add, delete, or modify components of the alternative. Please respond by October 27, to allow time for preparation and circulation of a revised draft prior to the workshop. If you don't have time for a written reply, feel free to call me at 756-2560 (H) or 978-4648 (W).

The draft alternative focuses primarily on physical aspects of mining, habitat, and reclamation. Also mentioned are a number of legal, financial, and institutional difficulties that might arise during implementation of the alternative. I would welcome any suggestions you might have for ways to overcome these potential hurdles.

Thank you for contributing to this effort. If together we can come 80 percent of the way toward consensus before the November workshops, the rest of the EIR process will be much more productive and we will all be more satisfied with the final result.

Sincerely,

Gus Yates

Enclosure

Distribution:

Katy Summ
Joe Scalmanini
Bob MacNicholl
Lee Humes
Dean Hargis
Evert Terminello
Kevin Wolf
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Board of Supervisors
Yolo County Water Resources Board
Jim Eagan
Steve Chainey
Fran Borcalli
Gary Carrasco
Agrarian Action Network
Sandy McLellan
Rich Rominger

Cache Creek Resources Management

FLOODPLAIN ALTERNATIVE

SUMMARY

FEATURES

Floodplain created by off-channel dry-pit gravel mining

Mining above water table only.

Mining only within designated floodplain area (generally within one-half mile of creek).

Land reclaimed to a flat floodplain at a level equal to the 20-year flood stage.

Reclaimed land in floodplain returned to agricultural production.

Unleveed floodway in central part of channel

Open floodway occupies half of channel area.

Layout of floodway designed for channel stability.

Removal of natural influx of upstream gravel permitted.

Corridors of native vegetation along channel

Half of channel area revegetated with native vegetation.

Several small freshwater marshes created.

BENEFITS

Restoration of scarce riparian habitat

Protects several threatened or endangered species.

Revitalizes native plant and animal communities.

Supports beneficial insects for agriculture.

Inproves recreational opportunities and scenery.

Flood protection

Floodplain stores and attenuates peak flood flows.

Native vegetation along channel banks buffers floodplain from energy of flood flows.

Peak flood flows decreased in downstream areas.

Low cost

"Natural" floodplain design eliminates need for permanent levees in mining areas.

2. Decreased maintenance of downstream levees.

Life of settling basin extended.

Aggregate resource availability

Allows extraction of enough gravel to meet moderate demand for 20 years.

Ground-water protection

Mining only above water table avoids impacts on aquifers.

Increased recharge in flood years from large inundated floodplain area.

Cache Creek Resources Management

FLOODPLAIN ALTERNATIVE

OUTLINE

I. PHYSICAL COMPONENTS

A. Unleveed floodway in center of channel

1. Non-vegetated.

2. Designed using hydraulic and sediment-transport principles to maintain uniform flow velocity and prevent local areas of excessive scour or aggradation. [See MacArthur, 1986.]

3. Bar skimming and removal of newly-deposited upstream gravel permitted.

4. Minimum width about 300 feet.

5. Total open area about 1,350 acres (half of present legal channel area). See figures 1 and 2 for possible layout.

B. Native vegetation along channel borders

1. Total vegetated area about 1,350 acres (half of present legal channel area).

2. Channel borders graded to maximum slope of 10:1. [This minimizes erosion, creates stable surface for revegetation, minimizes impact of burrowing animals on bank stability, and creates a gradual velocity transition between floodway and floodplain.]

3. Minimum 200-foot width of vegetation corridor between floodway and floodplain. [This absorbs streamflow energy and helps prevent fast, erosive currents from reaching floodplain.]

4. Vegetation consisting of native species representing riparian scrub, mixed riparian woodland, and cottonwood riparian forest, where each is appropriate. Non-native plants (eg. tamarisk) actively suppressed.

C. New freshwater marshes

1. Several marshes 5 to 50 acres in size created along gaining reach between Madison bridge and Stevens bridge. [Water table is close to thalweg along this reach.]

2. Created by shallow in-channel excavation to several feet below water table.

3. Located along edges of channel in areas where channel is relatively wide.

4. Marshes separated from each other along channel to prevent draining of ground water as streamflow.

D. Off-channel dry-pit mining

1. Mining above seasonal high water table only. [Water table measured on site by shallow piezometers.]

2. Mining only between creek and nearest major east-west road, canal, or developed area (see figure 1 for possible boundaries of floodplain).

3. Top 4 feet of soil stored and replaced following mining.

4. Land in floodplain reclaimed to level equal to the 20-year flood stage above the theoretical thalweg. Laser leveled.

5. Reclaimed land in floodplain at least 6 feet above seasonal high water table. [To maintain good soil drainage.]

6. Excavations below level of theoretical thalweg separated from creek channel by temporary levees higher than the 100-year flood stage. These levees removed following reclamation of excavation.

7. Berms perpendicular to creek constructed across floodplain at about 500-foot intervals. Tops of berms higher than 100-year flood stage (ie. about 3 to 4 feet above floodplain surface). [This prevents erosive sheet flow of water along floodplain. 500 feet is a common furrow length for Yolo clay loam.]

8. No off-channel pits permanently isolated from creek and floodplain. [These would have no flood-control benefits.]

9. Maximum excavation time of 5 years at any off-channel point. [This should be possible given relatively shallow mining depths. This encourages small, steadily-migrating pits and rapid return of land to agricultural production.]

E. Local channel stabilization

1. Local widening, straightening, or reshaping of channel or construction of grade control structures in order to protect bridge footings and to achieve stable channel configurations.

2. Example 1: create a tapered channel width with a 20-year floodplain between Madison bridge and I-505 bridge. This narrow reach is actively eroding, and tapering the width would tend to prevent scour (MacArthur, 1986).

3. Example 2: Slightly widen constricted, eroding reaches between I-505 bridge and Stevens bridge identified by MacArthur.

4. Example 3: Decrease slope of streambanks along gaining reach of creek. [Toes of steep banks in this reach are prone to erosion because of saturation by high water table.]

5. Avoid rip-rap or other maintenance-intensive channel stabilization methods except as a last resort.

F. Wet-pit mining study

1. Monitor ground-water effects and reclamation effectiveness of one or two prototype wet pits along the gaining reach between the Madison bridge and the Stevens bridge. [This information would be needed to design regulations if more widespread wet-pit mining were desirable at some time in the future.]

2. Use existing Solano Concrete pit as one test case. Consider permitting another test pit with a different size, design, mining method, or reclamation procedure. [For example, one specifically designed to decrease drainage of ground water to the creek.]

3. Monitor ground-water levels in shallow (Qal) and Deep (Tpth) piezometers installed around the perimeter of the pit before, during, and after the excavation.

4. Compare the agricultural productivity of reclaimed land with productivity of nearby unmined areas.

5. Test transmissivity of shallow aquifer and yield of nearby water-supply wells before, during and after excavation.

II. BENEFITS

A. Restoration of native vegetation and wildlife habitat

1. Helps prevent further decline of native plants and animals, including several threatened or endangered species.

2. Promotes populations of pollinating and predatory insects beneficial to agriculture.

3. Increases streambank stability.

4. Decreases velocity and erosive power of flood flows spilling onto floodplain.

5. Increases opportunities for hiking, birdwatching, and other forms of outdoor recreation.

6. Improves appearance of creek channel.

B. Flood control

1. Large floodplain absorbs part of the peak flow of 20-year or larger floods.

2. Decreased peak flood flows decrease flood risk and levee erosion downstream. [In contrast to floodway alternative, which forces creek into a smaller channel, thereby increasing peak plows, flood risk, and levee erosion.]

3. Passive channel-and-floodplain design eliminates risk of levee failure in mining areas. [Again, in contrast to the floodway alternative.]

C. Cost savings

1. Construction and maintenance of levees in mining areas avoided.

2. Decreased levee erosion and maintenance in downstream reaches.

3. Life of Cache Creek settling basin extended because silt in flood flows partly deposited on floodplain.

4. Channel modifications decrease damage to bridges and other structures.

D. Availability of aggregate resources

1. Approximately 81 million tons of aggregate available, which is sufficient to meet the moderate demand projection for the next 20 years. [Assumes that the land surface is lowered by an average of 10 feet over 70 percent of the 5,200-acre floodplain zone, that 1.25 tons of saleable gravel are obtained from every cubic yard of bulk material mined, that natural in-channel replenishment of gravel averages 0.092 million tons per year, and that completion of the Solano Concrete wet pit will yield 6.1 million tons of gravel.]

2. Economic benefits of aggregate industry to Yolo County continue.

E. Ground-water protection

1. Mining only above the water table decreases risk of direct contamination of ground water.

2. Mining only above the water table prevents decreases in aquifer transmissivity and storage coefficient.

3. Prototype backfilled wet pits along gaining reach of the creek could elevate ground-water levels on the side opposite the creek.

4. Inundation of the large floodplain area increases ground-water recharge during large floods.

F. Agricultural productivity

1. Reclamation of floodplain areas to fields allows mining without significant permanent loss of agricultural land.

2. Careful reclamation procedures (laser leveling, minimum 6-foot depth to water table, respreading of stored topsoil) help retain original land productivity.

III. IMPACTS

A. Inundation of floodplain could damage crops or interfere with farming operations. [But only occurs for several days in winter every 20 years on average.]

B. Floodwaters could scour floodplain fields, which would require releveling. [Vegetation corridor between channel and floodplain and berms across floodplain should mininize or eliminate erosive currents on the floodplain.]

C. Evapotranspiration of ground water by riparian vegetation would increase.

D. Freshwater marshes are potential sites of direct contamination of ground water. [But note that seepage direction in marsh areas will be from aquifer to creek, not creek to aquifer.]

E. Land in the floodplain area would lose its urban development potential.

F. Percolation of floodwaters through fields in floodplain could flush agricultural chemicals down to the water table.

G. Existing structures in floodplain area would have to be removed or left on "islands" or "peninsulas" of high ground.

H. The siphon that connects the Alder Canal to the Moore Canal on the other side of the creek might have to be lengthened.

I. Revegetation of half the stream channel would decrease the flow capacity of the channel.

IV. LEGAL, FINANCIAL, AND INSTITUTIONAL ISSUES

A. Land ownership

1. Who would own the creek channel, including the native vegetation?

2. What if some riparian landowners don't want to have their land lowered and turned into a floodplain?

3. Is loss of development potential in the new floodplain something for which landowners should be compensated?

4. Is it appropriate to use eminent domain to achieve the resource-management objectives of this alternative?

B. Implementation and enforcement

1. What are the preferred schedules of mining, reclamation, and revegetation for various locations in the channel and floodplain areas?

2. Should the mining be authorized by a single 20-year permit, or should permits for individual parcels be issued one at a time?

3. Who should review and approve details fo the implementation of the plan -- the Planning Commission, a technical advisory group, a consultant, or other?

4. What mechanisms would be most effective for hearing and responding to complaints or proposed modifications during the implementation period?

5. Should each mining company be responsible for revegetation along its part of the creek, or should the companies contribute to a central fund for that purpose?

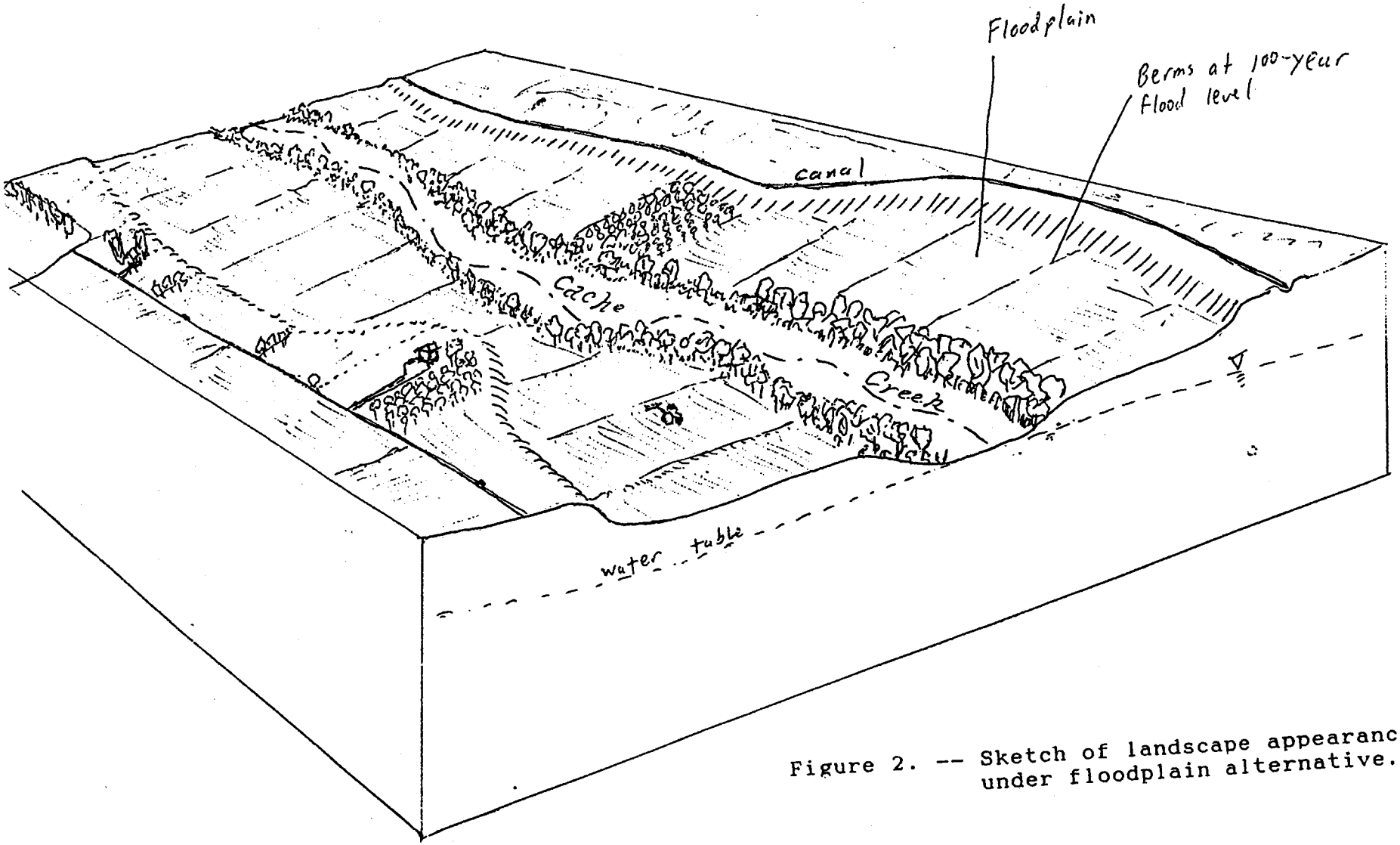
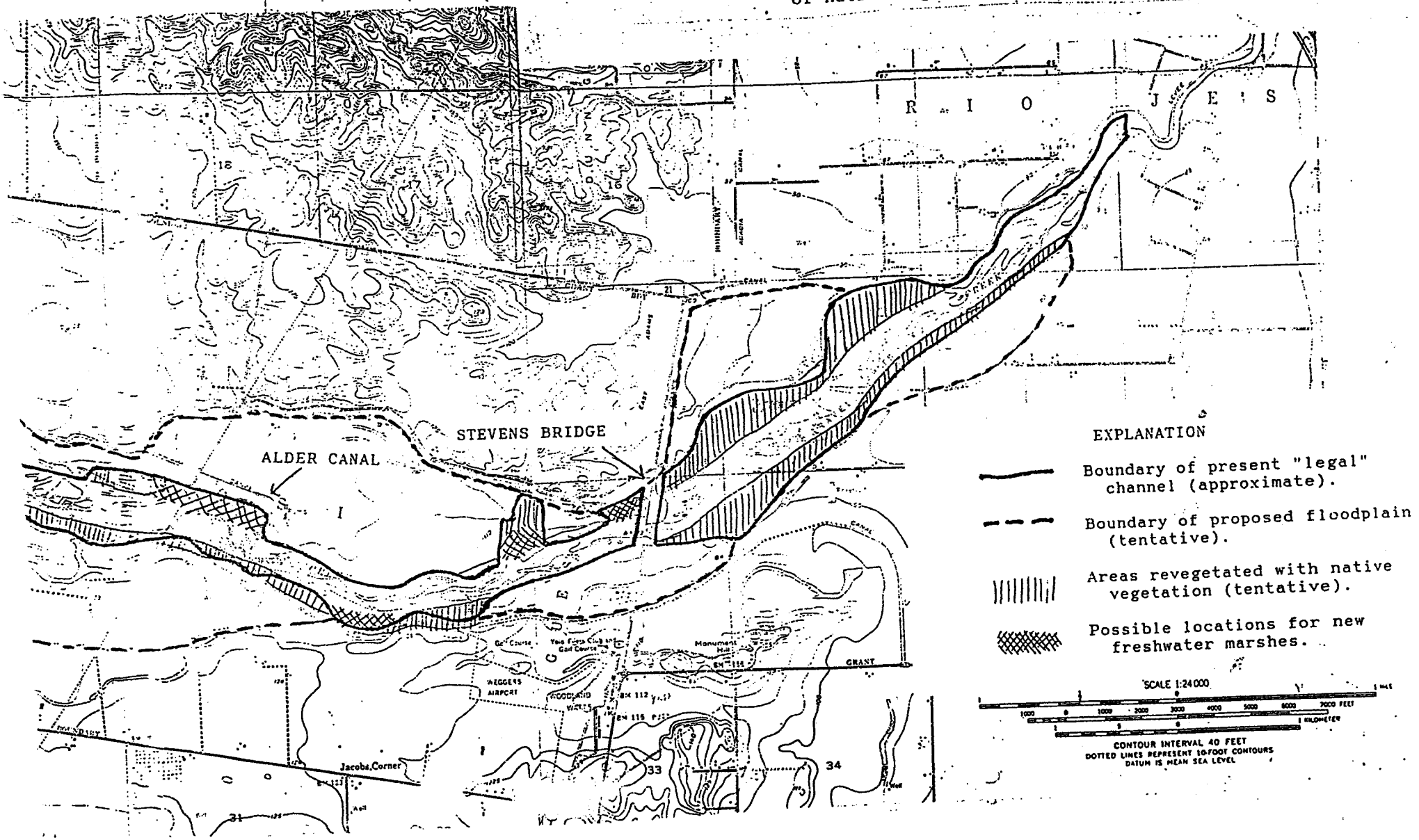
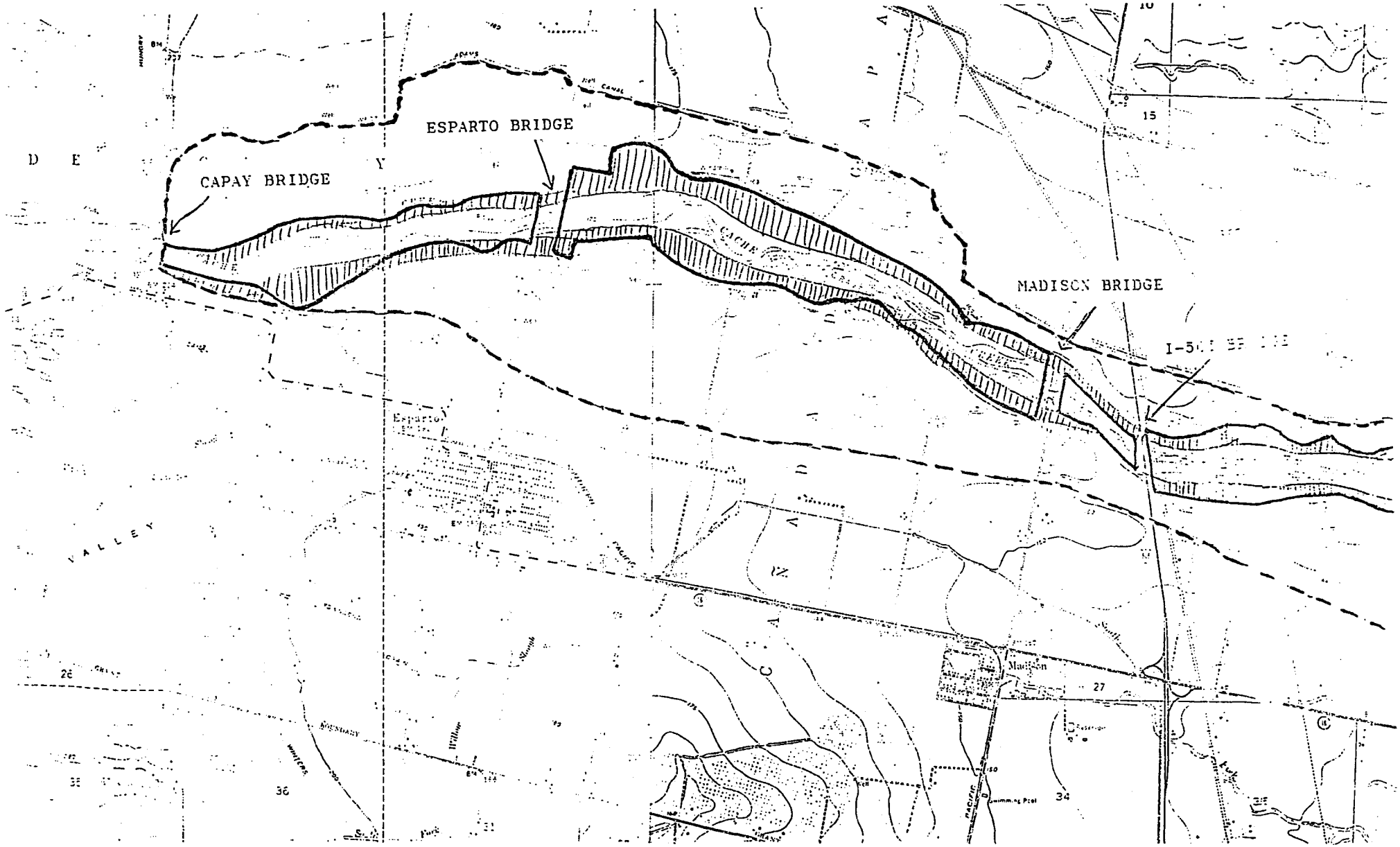


Figure 2. -- Sketch of landscape appearance under floodplain alternative.

Figure 1. -- Map of Cache Creek area showing possible locations of native vegetation and floodplain.

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Comments on Draft CCRMP

Probably the most accurate, correct, and important statement in this document is the third paragraph on page 23. Ongoing, consistent overviews of this program must be an integral part of its existence in order to justify efforts [that have been discussed for many years] to repair some of the damage done by mining.

ACTIONS recommended under 'VISION':

(2.4-2) Previous studies have indicated about 120,000 tons of material deposited in an average recharge; where did the 200,000 ton figure come from? Which is correct?

(2.4-10) Again, the most critical acknowledgment of this document is that we do not know what effect these proposed actions will have, and continuous monitoring must be built into the program to ascertain its sucesses or shortcomings. The last sentence of this is troubling, as it indicates a haphazard, and non-guaranteed approach to personnel involved in monitoring. There should be an objective, neutral, paid employee in charge of the implementation, timeliness, and analysis of monitoring and enforcement (of contract revegetation, etc.).

(2.4-11) The proposed TAC must, in order to have landowner cooperation (mentioned repeatedly throughout this document) and public support, include members of the affected public to be on this decision-making body. If the TAC is composed only of "out-of-town experts", with no public representation, there will be alienation from the implementation of the proposed actions. Who will determine who serves on this advisory committee?

Further note on Chapter 2: The Test Run 3 information is sketchy to non-existent. This information must be more specific. Where are the details? Who developed this? Are only gravel operators eligible to do the work as indicated in later chapters? Ch. 3 states that the TAC will do the monitoring. Will this include oversight of the process itself, or, as we are currently stuck with, a presentation/analysis of the job up to a year later?

Chapter 3: Lacks correct information on Boron sources. The Yolo-Zamora Water District commissioned a study of this issue. Was the information from that study used to determine the extent of the origin of this problem?

(3.5) Performance Standards:

(3.5-4) Sediment fines generated by aggregate processing SHOULD NOT BE USED for agricultural soil enhancement, in revegetation projects, or as backfill materials in off-channel excavations. These will be human-caused plugs to the aquifer, impairing permeability and blocking recharge of the contiguous aquifer. This concept is simply an attempt to move the excess from being the aggregate industry's problem to being our water supplies' problem. Use of this material in areas slated for revegetation would be counterproductive, creating an impediment to the establishment of extensive root systems by blocking water penetration.

A later section of this Draft deals with invasive species (tamarisk, giant reed) and it is the release of this fines (upstream, by the miners) which has created this problem in the reaches below Stevens Bridge. Those opportunistic species gained a foothold because desired native species couldn't live in the sealed-over deposits of fines.

It is hard to understand the statement (p.38,para.2) that there is an absence of a defined low-flow channel in the Madison Reach; the Syar plant at the Madison Bridge site has a clearly delineated channel with some riparian vegetation well established.
Chapter 4.0 is confusing in using two different appellations for the Reaches. Does Reach 1 correspond to the Capay sub-reach or the Hoppin sub-reach? (It is more clearly spelled out on Pg. 68, and in the Technical Studies that the numbered reaches run upstream, and the sub-reaches run downstream.)

Pg. 41, Reach 4: The short-term mining permit for Solano Concrete included creation of a riparian zone adjacent to the Creek (north of their proposed pits). Will more "shallow depressions" be created in-channel through the measures proposed here, or will the previously ordained ones be found to suffice?

Pg. 45, Para. 1: HAWK and AmeriCorps are NOT volunteer organizations, but taxpayer funded scams preying on the current fad of "eco-conservation" through grants. The work done on creek restoration should be done by professionsl firms with performance insurance to ensure that plantings are maintained until established. HAWK already has a track record in the other direction on this issue. The last sentence of this paragraph belies the amount of money already spent to write the Biological Resources portion of the Technical Studies. The work outlined in that sentence should have been done as a part of that baseline study.

(4.3) Objectives: (4.3-3): Standards developed for public service groups should include performance standards, liability insurance coverage, and some form of assurance to land-owners to insure that persons involved in these efforts do not return to the area at unauthorized, unsupervised times, committing trespass and other violations against the property owners.

(4.4) Actions: (4.4-5): The establishment of preserves must address the issue of desirable vs. unwanted access to these sites. (See comments on Sections 5.5-7 and -8)

(4.5-16,c): How does agricultural tailwater provide bio-filtering? If it is the pit that is being referred to here, this reinforces the fear the public has about the sealing and/or contamination possibilities of the aquifer by residual pesticides.

Chapter 5 (5.1,Para.2): The Woodland Airport parachute jump site is over 10 miles South of the Creek. There are 2 equestrian facilities on the South side of the Creek in the area of CO. Rd. 96B and Rd. 20.

(5.5): It is amazing that with all the profits the aggregate industry has generated and hauled off since 1979 at the expense of the Creek and the public (taxpayers), that we are now being made dependent on "compatible programs" to be developed by (already) taxpayer supported schools, which are certainly thinly stretched in their resources. If this Creeks' future had not been previously taken out of the control of the citizens, perhaps this volunteer concept would have been a viable option, but the public did not buy into the destruction, and now many people feel that the agencies that destroy a resource should be responsible for its' rebirth, and thereby people will not voluntarily provide the necessary efforts.

(5.5-7 and-8): How possibly will these conditions be enforced? The County is unwilling to commit the necessary funds for patrolling or prosecuting violators currently. Where will future monies come from for this?

Janet Leners

12/19/95

YOLO COUNTY DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH SERVICES
10 Cottonwood
Woodland, CA 95695
(916) 666-8646

LAND USE PROJECT EVALUATION

PROJECT DESCRIPTION

Title: NOP - Cache Creek Resources Management Plan (CCRMP) EIR

Type: NOP - CCRMP EIR

Location: Cache Creek

Applicant: Yolo County APN: N/A

Date Received by E.H.: 1/8/96

Environmental Health has evaluated/reviewed the above referenced project proposal and would like to comment as follows:

The proposed EIR would need to address the following:

1. The impact of the quality of surface and groundwater at and adjacent to Cache Creek as the result of gravel mining.

2. How will Cache Creek be assured of no contamination (toxic, solid waste, liquid waste, etc.) from activites of gravel mining?

3. How will Cache Creek be restored to its original ecological state after mining is done?

4. How will sanitary facilities and drinking water be provided to workers of gravel mining?

Continued on next page.

PETE WILSON
GOVERNOR

State of California

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

LEE GRISSOM
DIRECTOR

DATE: January 4, 1996

TO: Reviewing Agencies

RE: CACHE CREEK RESOURCES MANAGEMENT PLAN
SCH# 96013004

Attached for your comment is the Notice of Preparation for the CACHE CREEK RESOURCES MANAGEMENT PLAN draft Environmental Impact Report (EIR).

Responsible agencies must transmit their concerns and comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of this notice. We encourage commenting agencies to respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

DAVID MORRISON
YOLO COUNTY COMMUNITY DEVELOPMENT AGENCY
292 WEST BEAMER
WOODLAND, CA 95695

with a copy to the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the review process, call at (916) 445-0613.

Sincerely,

Antero A. Rivasplata

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Attachments

cc: Lead Agency

KEVIN WOLF
724 N St.
Davis CA 95616
kjwolf@dcn.davis.ca.us
phone: (916) 758-4211 fax: (916) 758-2338

January 10, 1996

David Morrison
Resource Management Coordinator
Yolo County Community Development Agency
292 West Beamer St.
Woodland, CA 95695

Dear Mr. Morrison and the EIR team,

I wish to comment on the Scope of the CCRMP EIR. Please keep me informed and include my thoughts as you develop this important environmental review.

I believe the Channel Bank Widening alternative offers many benefits, and I would like the following comments on the scope of the studies needed to fully explore this option. Flood control is a major concern for residents along the creek and in Woodland. Clearly a wider channel will help control floods. How wide might the channel be. A number of years ago Gus Yates proposed a mile wide channel in which Cache Creek water could spill in a flood event. In most years the creek would stay within a 200-400 yard wide riparian corridor. A half mile on each side of the creek would be lowered via gravel mining over the next 20-30 years. Outside of this channel, there would not need to be levees to hold the 100+ year flood because of the lowered inside section.

The CCRMP Alternative 3 should include what Yates called the Floodplain Alternative as part of its scope. Clearly this will overlap into the OCMP because this one mile zone would be what is presently called off-channel. As you stated, there will be overlaps between the CCRMP and the OCMP. A key element would be in when and where the off-channel mining occurred and how it is integrated into the growing flood plain. Some mining close to the creek early in the 20 year transition might be important as interim steps.

The Floodplain Alternative would impact the planning and therefore the scope of work needed to determine the biological resource and riparian restoration work in the creek. Of course it would affect agriculture and many of the other elements of the EIR.

Last, I would like the Scope of the EIR to include how a very wide channel might benefit downstream flooding around Woodland. The wide channel will slow the water down as it gives it a place to go. In addition, the occasional wide flooding will help restore groundwater levels. I look forward to hearing from you how you respond to my request. Thank you.

Sincerely,

Kevin Wolf

1742 Midway Drive
Woodland, CA 95695

January 15, 1996

David Morrison
Yolo County Community Development Agency
292 West Beamer Street
Woodland, CA 95695

Subject: CACHE CREEK RESOURCES MANAGEMENT PLAN

Dear David:

I have now read the First Draft of the Cache Creek Resources Management Plan for Lower Cache Creek, and feel in general that it is well done. I am particularly impressed with Chapter 4.0, the Biological Resources Element. I have some specific suggestions, as follows.

The various zones and reaches should have their names standardized. Chapter 3.0 refers to Zones 1 through 5, and they correspond only in part with the "reaches" described in Chapter 4.0. Even Chapter 4.0 is internally inconsistent in its use of names. Figures 6 and 7 use the names "Hungry Hollow Subreach", "Madison Subreach", and so on, whereas the text on pages 38 and 41 use the terms "Reach 2", Reach 3", and so on, and occasionally inserts the "name" of a reach, such as in Reach 4, where it says, "The Dunnigan Hills reach . . ." It seems to me to be elementary that the names should be standardized and used uniformly throughout the report. I found it irritating and exasperating to have to leaf back and forth through the report, in order to figure out how "zones", "reaches", "subreaches", and named "subreaches" relate to each other. The "zones" in Chapter 3 are especially irksome because the zones appear not to have a one-for-one correlation with the "reaches" in Chapter 4. This should be corrected throughout.

Pages 26 and 27, Action 2.4-12, should have a sentence added at the end as follows: " Special attention should be taken to ensure that such methods and practices will incorporate riparian vegetation as described in Objective 4.3-5 and maximize wildlife habitat values, to the extent that the objective to minimize scour and erosion is not compromised."

Page 41, "Reach 3": It is pointed out that the pits in this reach have high recharge value. Then the sentence appears: "The floor of the pit should be elevated and riparian forest planted." Elevation of the floor above the water table is understood, in order to achieve maximum recharge value. However, my understanding is that pits used for recharge must be accessed by heavy equipment on a regular basis in order to remove accumulated silt. The planting of riparian forest on the floor of such a pit would seem to be in conflict with this requirement. Riparian forest has high value, but so do recharge pits. It seems that the best use for pits in this area is for recharge, together with such corollary wildlife habitat values that may be possible. Removal of the inconsistent sentence would seem to be appropriate.

I am strongly in concurrence with the wording in the Goals, Objectives, and Performance Standards in Chapter 5, "Open Space and Recreational Element." I believe that public access

absolutely must be provided for; otherwise, the public will not be inclined to support the restoration activities planned for the creek, and might even become antagonistic toward the program. Wording of the type which is already in the plan is highly appropriate, and must be retained in future versions. I call attention specifically to the following kinds of words, which I feel must survive in future drafts:

Objective 5.3-1: ". . . provide for limited access, at specific locations, to recreational and educational uses."

Action 5.4-2: "Intensive recreational uses shall be located away from designated habitat areas." Note, however, that this sentence requires interpretation of the word "intensive." I would suggest the following rewording of the sentence: "Intensive recreational uses, such as horseback riding, picnicking, and boating, shall be located away from designated habitat areas." Also, it is not clear at this point whether the sites designated as proposed recreation nodes in Figure 11 are indeed those which ultimately will prove to be the most desirable. At least three of these locations are also identified as "Preliminary Wildlife Preserve Areas" in Figure 10. I would suggest that the opening sentence of this paragraph be rephrased as follows: "Identify possible locations for future recreational and educational uses along Cache Creek, such as are shown in Figure 11, recognizing, however, that some of these sites also are potential wildlife habitat sites, and that some kinds of recreational activities may not be appropriate at these sites."

Action 5.4-6: "Design and manage recreational sites so that trespassing, vandalism, and other undesirable activities are discouraged." This language is absolutely vital, and must be retained. Please note that two kinds of activities which are mentioned in Action 5.4-2, namely, hiking and horseback riding, may defeat the intent of Action 5.4-6 if they are fully implemented. I refer specifically to the fact that hikers and horseback riders expect to have trails which are continuous, and which "go someplace." Such trails, if they indeed are continuous and act to connect one access point to another, will be be very difficult to control, and will be the kind of thing which will give ready access to trespassers and vandals. I would strongly recommend that another sentence be added to Action 5.4-6, as follows: "All access, whether by road or by trail, shall be through an entry point which can be controlled, and will return to that same entry point without giving road or trail access to other parts of the creek." Such language will go a long way toward alleviating the concerns of property owners along the creek.

Performance Standard 5.5-1: "More active uses, including parking, restrooms, and picnic areas should be located in areas located away from sensitive habitat, . . ." This is excellent language, and compatible with what I have suggested in the foregoing.

Performance Standard 5.5-2: "Recreational uses shall be clustered at locations along the creek, in order to limit public access, minimize habitat disturbance, and provide efficient and cost-effective management by the County." This is excellent language, and must be retained. Perhaps the language regarding access which I gave in the paragraph 5.4-6, above, belongs here, in this Performance Standard.

Performance Standard 5.5-3: "Physically control access with gates and collect user

fees to support operations and deter inappropriate activities. Limited public access will also reduce impacts to sensitive habitat and adjoining private uses." This is excellent language, and must be retained. I suspect those who favor hiking and horseback riding will be opposed, but I think the restrictions must be retained, both for the sake of the habitat, and for the sake of adjoining property owners.

All of the remaining Performance Standards, 5.5-4, 5.5-5, 5.5-6, 5.5-7, and 5.5-8 (I won't requote them here) are excellent, well thought out, and must be retained, although I am sure there are groups which will make loud noises in the opposite direction.

In Performance Standard 6.5-9, the following wording should be added: "Haul roads should be designed to avoid existing or restored riparian habitat." This sentence is necessary because the requirement that haul roads be located along the toe of the stream bank puts them precisely in the location where riparian habitat is most likely to be found.

Action 7.4-1, relating to the establishment of a "Safe Harbor" program for agricultural operations potentially impacted by the development or riparian habitat along Cache Creek is very important. The wording is well chosen, and the concept must be retained in the Plan. Farmers along the creek must be given the confidence that the habitat restoration on the creek will not be likely to damage their livelihoods.

I am a director for the Cache Creek Conservancy, and am President of the Yolo Audubon Society, but my remarks herein are purely my own, and I do not speak on behalf of either of those organizations.

Sincerely,

John D. Kemper

copies: Tom Stallard
Steve Chainey

STATE OF CALIFORNIA - THE RESOURCES AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF CONSERVATION
Office of Mine Reclamation
Reclamation Unit
801 K Street, MS 09-06
Sacramento, CA 95814-3529
(916) 323-8567 PHONE
(916) 322-4862 FAX

January 17, 1996

Mr. Dave Morrison
Yolo Community Development Agency
292 West Beamer Street
Woodland, California 95695

Subject: Cache Creek Resources Management Plan

The Department of Conservation's Office of Mine Reclamation has reviewed the Cache Creek Resources Management Plan (CCRMP) (December 4, 1995) and Technical Studies (October 24, 1995) submitted for the above listed project. The CCRMP addresses mining and reclamation activities within the lower reaches of the Cache Creek channel and, in doing so, considers an area within a "streamway influence boundary" that largely corresponds to the meander belt of the historic Cache Creek channel as identified in the Technical Studies. The following comments, prepared by James Pompy, Michael Sandecki and Mary Ann Showers, are offered to assist in your review of the project.

1. It is unclear how the Technical Advisory Committee, which is charged with most of the site specific decision making for the plan, will be formed. Criteria for recruiting the scientific and engineering experts that will be needed to make informed decisions should be described in the CCRMP.

2. The CCRMP should be amended to include a graphic representation of the often referenced Test 3 Run Boundary (Boundary). The Boundary will be used as a template to re-shape the channel.

3. The relationship between the Boundary and bridge foundations should be more thoroughly described in the CCRMP and in the Technical Studies. Any other infrastructure, such as diversion dams or utility crossings, should be considered in greater detail in the CCRMP.

4. A detailed description of the monitoring needs should be included in the CCRMP. The topographic surveys, which will be similar in format to existing data collection programs, should be described in the CCRMP.

5. A commitment to periodically re-calibrating the mathematical model used to demonstrate improved sediment routing should be included in the CCRMP.

6. We recommend that ACTIONS identified in the CCRMP be arranged in order of implementation. For example, we recommend that ACTION 2.4-1 recommending creation of a Technical Advisory Committee (TAC) be placed at the beginning of the

ACTIONS rather than at the end of the listed items. Similarly, we recommend that like ACTIONS be grouped together.

7. The PERFORMANCE STANDARDS proposed in the CCRMP include recommended actions, guidelines, or best management practices. They are not performance standards since they do not provide standards against which to measure the success or failure of the proposed ACTION. We recommend that the PERFORMANCE STANDARDS in the CCRMP be revised to provide specific measurable standards for each of the CCRMP elements.

8. We recommend that the CCRMP include an APPROVALS NEEDED section since many of the ACTIONS and PERFORMANCE STANDARDS listed address approvals required to implement the project.

BIOLOGICAL RESOURCES ELEMENT

9. We recommend that all Biological Resources information, pertinent to the proposed CCRMP, contained in the Technical Studies be included in the CCRMP. The Technical Studies contain significant amounts of information and a number of maps that have not been incorporated into the CCRMP.

10. Figure 5 in the Water Resources Element shows Recommended Management Activity Zones. We recommend that the riparian restoration area shown on Figure 5 be revised to correspond to Figure 6 in the Biological Resources Element. We also recommend that the map show areas of existing vegetation, such as is contained in the Technical Studies.

11. The Biological Resources Element refers to numbered stream reaches. We recommend that Figures 6 and 7 be revised to reflect the numbering system used.

12. We recommend that the discussion of Reach 5 be revised to state that the "stunted riparian forest" will be enhanced through revegetation.

13. Under the discussion of Reach 3 and Reach 6, the CCRMP recommends that riparian restoration be coordinated with the Flood Control District so as not to "preclude future recharge opportunities." The statements imply that riparian restoration would limit the effectiveness of the recharge areas. We recommend that these statements be revised to reflect the benefits of vegetative cover to groundwater recharge. Vegetation moderates and enhances water infiltration be minimizing surface run-off and sheeting, adds organic material to the soil, thereby increasing the capacity of soil for water retention, reduces evaporation from the soil surface, and provides for steady-state infiltration into the recharge zone.

14. The Biological Resources Element discusses coordination with private landowners, volunteer organizations, the Flood Control District, and the U.S. Army Corps of

Engineers to implement the proposed project. We recommend that consultation with the California Department of Fish and Game also be referenced in the CCRMP.

15. Riparian enhancement and restoration is discussed under the GOALS section. We recommend that the terms "diverse riparian ecosystem," "riparian and wetland vegetation," and "high quality natural habitat" be defined so that specific ACTIONS can be developed. Reference should be made to an established wetland classification system, such as by Cowardin et al. Wetland mitigation should correspond to standards developed by the U.S. Fish and Wildlife Service and the California Department of Fish and Game.

16. OBJECTIVE 4.3-1 proposes to conserve and protect existing riparian habitats. ACTION 4.4-2 recommends removing vegetation that threatens channel stability. We recommend that areas to be protected be clearly identified on plan maps and also flagged in the field so they are not inadvertently removed. Similarly, vegetation that will be removed should also be shown. In proposing replanting of disturbed areas, we recommend that specific replacement ratios by plant species be provided.

17. ACTION 4.4-7 recommends enlisting the assistance of community groups in carrying out ongoing monitoring programs. Monitoring stations and criteria are not discussed. We recommend that the CCRMP develop standardized monitoring methodology at specific stations so that data collection will be replicated over time. Unless a standardized approach is developed, monitoring data will not be valid and cannot be analyzed statistically. We recommend that the vegetation monitoring program be developed prior to CCRMP approval and that monitoring continue until performance standards are met. The monitoring plan should also propose specific remedial measures if the performance standards not be met within a specified monitoring period.

18. Many of the PERFORMANCE STANDARDS provide specifications for implementation of a revegetation program and do not constitute true performance standards. To conform with the Surface Mining and Reclamation Act of 1975 (SMARA) and the State Mining and Geology Board regulations for surface mining and reclamation practice (California Code of Regulations (CCR) Title 14, Chapter 8, Article 1, Section 3500 et seq.; Article 9, Section 3700 et seq.), the CCRMP should include specific quantitative performance standards. We recommend that the revegetation performance standards incorporate the following information:

    a. The cover, density, and species richness of a reference site. Canopy stratification should also be addressed. A list of plant species, including scientific name, should be provided.

    b. A reach by reach discussion of the desired plant densities, vegetative cover, and species richness. Spacing of plants, plant associations, and planting methods should be specified.

c. A specific cover standard for areas to be seeded. State the maximum amount of bare soil or rock that will be allowed to achieve the standard.

d. The maximum density and cover of invasive non-native species. The standard should specify a "trigger point" for application of herbicides or mechanical removal.

19. PERFORMANCE STANDARD 4.5-14 provides guidelines for riparian woodland habitat areas. It is not clear if the densities stated are planting densities or the desired final densities. We recommend that this point be clarified.

20. It is not apparent why PERFORMANCE STANDARD 4.5-15 recommends planting oak woodland trees and shrubs in single species groupings. We recommend that planting reflect natural associations of species of plants, such as pine bluegrass in the understory of oaks.

21. PERFORMANCE STANDARD 4.5-16 recommends the use of agricultural tailwater for irrigation of riparian vegetation. We recommend that the tailwater be analyzed for herbicide and pesticide residues prior to its use.

22. We recommend that PERFORMANCE STANDARD 4.5-17 describe how topsoil and vegetation to be transplanted will be maintained until used. Topsoil should be protected from wind and water erosion. For long term storage, that is, six months to two years, we recommend that the topsoil be seeded with native species to be used in revegetation. Topsoil locations should be clearly identified on plan maps and in the field.

23. We recommend that PERFORMANCE STANDARD 4.5-18 define what is meant by "excessive bank erosion."

24. The CCRMP proposes to remove and dispose of or burn all dead giant reed (*Arundo donax*). Since giant reed can reproduce from live stems, we recommend that care be used in disposal so that "dead" plants do not reproduce and spread to areas not currently infested.

If you have any questions on these comments or require any assistance with other mine reclamation issues, please contact me at (916) 323-8565.

Sincerely,

James S. Pompy, Manager
Reclamation Unit

23 January 1996

File No.: 96-YO-4E

re: Cache Creek Resources Management Plan and EIR

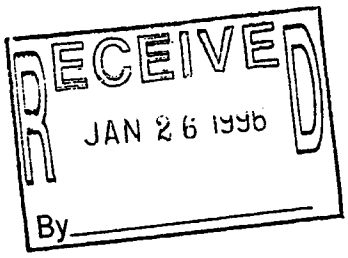
Dear Staff:

Our office has no additional comment on the above referenced document. However, thank you for your continued concern for protecting historical resources.

Sincerely,

Leigh Jordan

Leigh Jordan
Coordinator, NWIC



NORTHWEST INFORMATION CENTER
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Rohnert Park, CA 94928-3609

DAVID MORRISON
COUNTY OF YOLO
COMMUNITY DEVELOPMENT DEPT.
292 WEST BEAMER ST
WOODLAND CA 95695

STATE OF CALIFORNIA-BUSINESS, TRANSPORTATION AND HOUSING AGENCY PETE WILSON, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 3, SACRAMENTO AREA OFFICE * MS 41
P. O. BOX 942874
SACRAMENTO, CA 94274-0001
TDD 916 741-4509
FAX no. 916 323-7669
Telephone 916 327-3859

January 25, 1996

HYOL006
03-YOL-16
Cache Creek Resources
Management Plan
NOP
SCH#96013004

Mr. David Morrison
Yolo County Community Development Agency
292 West Beamer Street
Woodland, CA 95695

Dear Mr. Morrison:

Thank you for the opportunity to review and comment on the above referenced document.

COMMENTS:

- Potential impacts on upstream and downstream structures should be identified, as well as mitigation measures, for the various alternatives studied.

Please provide our office with a copy of the DEIR on this plan when it becomes available. If you have any questions regarding these comments, please contact Ken Champion at (916) 324-6642.

Sincerely,

JEFFREY PULVERMAN, Chief
Office of Transportation
Planning - Metropolitan

cc Dana Lidster, State Clearinghouse
John Joyce, Yolo County Director of Public Works

STATE OF CALIFORNIA-BUSINESS, TRANSPORTATION AND HOUSING AGENCY PETE WILSON, *Governor*

DEPARTMENT OF TRANSPORTATION
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January 31, 1996

HYOL006A
03-YOL-16
Cache Creek Resources Management Plan
NOP
SCH # 96013004

Mr. David Morrison
Yolo County Community Development Agency
292 West Beamer Street
Woodland, CA 95695

Dear Mr. Morrison:

Thank you for the opportunity to submit supplemental comments to those included in our January 25, 1996, letter on the above referenced document.

COMMENTS:

- The Draft Environmental Impact Report should address changes in mining aggregate truck hauling practices (ie. routes used, truck volumes, impacted intersections, etc.). Please refer to the May 25, 1995, letter (enclosed) with our comments on a similar project.

Please provide our office with a copy of the DEIR on this plan when it becomes available.

If you have any questions regarding these comments, please contact Ken Champion at (916) 324-6642.

Sincerely,

JEFFREY PULVERMAN, Chief
Office of Transportation
Planning - Metropolitan

cc: Dana Lidster, State Clearinghouse
John Joyce, Yolo County Director of Public Works

STATE OF CALIFORNIA-BUSINESS, TRANSPORTATION AND HOUSING AGENCY PETE WILSON, Governor

DEPARTMENT OF TRANSPORTATION
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May 25, 1995

GYOL019
03-YOL-16 P.M. 27.8
Reiff Site - Short Term Mining and Reclamation
Project CUP
DEIR

Ms. Linda Peirce
Yolo County Community Development Agency
292 West Beamer Street
Woodland, CA 95695

Dear Ms. Peirce:

Thank you for the opportunity to review and comment on the above referenced document.

COMMENTS:

*Caltrans has reviewed the Draft Environmental Impact Report (DEIR) for a proposed off-channel mining operation adjacent to Cache Creek. The following issues cited by Caltrans in our letter of December 20, 1994, regarding the Notice of Preparation (NOP) have not been adequately addressed in the DEIR:

Bank/Levee Stability Analysis

The final document should include proposed mitigation measures to insure the mining pits remain physically separate from the active Cache Creek stream channel. The levee stability and accompanying hydraulic analyses (with water surface elevations and velocities) should be reviewed by Caltrans. The reclamation plan should outline the ongoing and proposed termination maintenance programs to preserve the physical separation.

- This project proposal should not have significant traffic volume impacts on the Interstate 505/County Road 19 Interchange. However, the truck traffic generated could produce some impacts to pavement conditions at the ramp intersections. These areas should be reviewed for possible mitigation. (Refer to page 4.8-17, Mitigation 4.8-4.)

Please provide our office with copies of any final action taken regarding this project.

If you have any questions regarding these comments, please contact Ken Champion at 916-324-6642.

Sincerely,
Original signed by

JEFFREY PULVERMAN, Chief
Office of Transportation Planning Metropolitan

cc: Mark Goss, State Clearinghouse
Bill Lindsey, HQ Structures (Mining)
Erol Kaslan, OSM & I
Richard Fox, Office of Structural Foundations
John Joyce, Yolo County Director of Public Works
bcc: Jim Brake, Office of Transportation Operations
Dennis Jagoda, Hydraulics
Terrie Bressette, Materials Lab
Jim Morris, Materials Lab
Trin Campos, Project Manager - West
Ken Champion, District 3 - Yolo County IGR Coordinator
KC:kc/jh

STATE OF CALIFORNIA—THE RESOURCES AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF FISH AND GAME
REGION 2
1701 NIMBUS ROAD, SUITE A
RANCHO CORDOVA, CA 95670

(916) 358-2900

January 31, 1996

Mr. David Morrison
Resource Management Coordinator
Yolo County Community Development Agency
Planning Division
292 West Beamer Street
Woodland, California 95695

Dear Mr. Morrison:

The Department of Fish and Game (DFG) has reviewed the Notice of Preparation (NOP) and Notice of Scoping Meeting for the Cache Creek Resources Management Plan (CCRMP) Program-Level Environmental Impact Report (EIR).

The CCRMP represents the second of two key plans that county staff has prepared to manage the resources of the aggregate mining reach of Cache Creek. The CCRMP addresses a variety of issues relevant to managing the diverse resources within the creek channel. The other key plan is the Off-Channel Mining Plan (OCMP) which focuses on sand and gravel extraction outside the creek channel. The draft OCMP was released on October 30, 1995. Though they will be stand-alone plans, it is proposed that the final OCMP and CCRMP be joined together after adoption, as one printed document entitled the Cache Creek Area Plan.

The DFG recommends that the Draft EIR address and mitigate the following concerns:

1. The project's potential adverse impact upon wetlands (i.e., vernal pools, riparian, emergent vegetation, etc.). Mitigation should be provided based upon the concept of no net loss of wetland habitat values or acreage.

2. The project's potential adverse impacts upon the burrowing owl (Athene cunicularia), a State species of special concern. The project site should be surveyed for this owl. If found, mitigation measures should be provided.

3. The project's potential adverse impacts upon the tricolored blackbird (Agelaius tricolor) a State species of special concern.

4. The project's potential adverse impacts upon the bank swallow (Riparia riparia) a State-listed threatened species.

5. The project's potential adverse impacts upon the giant garter snake (Thamnophis gigas) a State-and Federally-listed threatened species.

6. The project's potential adverse impacts upon nesting and foraging habitat for the Swainson's hawk (Buteo swainsoni), a State-listed threatened species.

7. The project's potential adverse impacts upon Elderberry bushes (Sambucus sp.), which are host plants for the Federally-listed threatened valley elderberry longhorn beetle (Desmocerus californicus dimorphus).

8. The project's potential for growth inducing and cumulative impacts upon the area's fish and/or wildlife values should be discussed and mitigated.

We recommend that appropriately designed surveys for listed, proposed, or candidate species be undertaken by qualified biologists. Surveys for plants should not be restricted to the identified species; instead, a complete botanical inventory of the project site should be conducted. Botanical surveys should be conducted at times when species are most likely to be encountered, in order to maximize the likelihood of encountering each species during the season most appropriate for accurate identification. Surveys should be based on field inspection, and not on prediction of occurrence based on habitat or physical features of the site. The results of all biological surveys should be published in the environmental impact report. The report should include a brief discussion of survey methods including sampling methods and timing of surveys. Results should include a list of all species encountered as well as maps of vegetation types, populations of plant species, and breeding, nesting or burrowing sites or other habitat components important to animal species. All conclusions should be justified and fully explained.

In order to comply with Public Resources Code Section 21081.6, a detailed monitoring program must be developed for all required mitigation conditions. The monitoring program should include the following:

1. Specific criteria to measure the effectiveness of mitigation.

2. Annual monitoring for a minimum of five years.

3. Annual monitoring reports (submitted to the lead agency and the DFG), each of which include corrective recommendations that shall be implemented in order to ensure that mitigation efforts are successful.

The applicant should be advised that work consisting of but not limited to diversion or obstruction of the natural flow or changes in the channel, bed, or bank of any river, stream, or lake, will require notification to the DFG as required by Fish and Game Code Section 1600 et seq. The notification (with fee), and subsequent agreement, must be completed prior to initiating any such work. Notification to the DFG should be made after the project is approved by the lead agency. The agreement process should not be used in lieu of specific mitigation measures to be included as conditions of project approval by the lead agency.

Pursuant to Public Resources Code Sections 21092 and 21092.2, the DFG requests written notification of proposed actions and pending decisions regarding this project. Written notifications should be directed to this office.

If we can be of further assistance, please contact Mr. Roger Scoonover, Associate Wildlife Biologist, telephone (916) 666-3407, or Mr. Dave Zezulak, Acting Environmental Services Supervisor, telephone (916) 358-2929.

Sincerely,

Brian Hunter

L. Ryan Broddrick
for Regional Manager

cc: Mr. Roger Scoonover
Mr. Dave Zezulak
Department of Fish and Game
Rancho Cordova, California

Jan 1996

Dear Sir:

I submit the following question to be included in the scoping process for the Cache Creek management Plan.

1. the issue of groundwater classification for appropriative water Rights purposes.

see letter to Ms. Oliver from State Water Resources Control Board, Edward C. Anton, Chief, Division

The letter states Yolo County agreed to include the issue of groundwater in the EIR.

Sincerely

Sally Oliver
16634 Co Rd 98
Woodland Ca
95695

STATE OF CALIFORNIA

STATE WATER RESOURCES CONTROL BOARD
THE PAUL R. BONDERSON BUILDING
901 P STREET
SACRAMENTO, CA 95814
(916) 657-1359

FAX: (916) 657-1485

PETE WILSON, Governor

Mailing Address
DIVISION OF WATER RIGHTS
P.O. BOX 2000, Sacramento, CA 95812-2000

In Reply Refer
to:333:JAL:266.0

MAY 7 1993

Ms. Sally Oliver
16634 County Road 98
Woodland, CA 95695

Dear Ms. Oliver:

GRAVEL MINING IN THE CACHE CREEK AREA OF YOLO COUNTY

Thank you for your participation in the Public Forum of the State Water Resources Control Board's (State Water Board) workshop on April 12, 1993, and for your letter of the same date. In your presentation you requested that the State Water Board commence a study on strip mining for gravel on Cache Creek to determine impacts to aquifer recharge from the stream and impacts to aquifer storage capacity. In response to your request, the State Water Board agreed to discuss this issue with other involved agencies and to furnish you with a written response.

The California Division of Mines and Geology (DMG) and the Yolo County Planning Department were contacted and the following information was obtained. Pursuant to the Surface Mining and Reclamation Act, the DMG completed a mineral land classification study of aggregate resources in the Sacramento-Fairfield production-consumption region which includes the Cache Creek drainage. The DMG study, however, did not address the issues of impacts to water quality and quantity resulting from mining operations. The study concluded that Cache Creek deposits, totaling 27 square miles in area, contain high-grade aggregate. According to DMG geologist, Don Dupras, in spite of the presence of high grade aggregate resources, the State Mining and Geology Board did not designate the Cache Creek area as having regionally significant mineral deposits for land use planning purposes.

Mr. David Flores of the Yolo County Planning Department explained that the county is preparing an environmental impact report (EIR) on aggregate mining in the Cache Creek area. Previously, a resource management plan was prepared for the county by consultant Dames & Moore. Because of opposition from the community, this plan was not adopted. Mr. Flores stated that Yolo County has authorized hiring a Resource Manager to prepare a request for proposal on a new resource management plan. Mr. Flores explained that the county has completed a project description, and the subsequent EIR will address the issues of impacts to storage capacity in the underlying aquifers and impacts to the quality of groundwater due to aggregate extraction.

According to Mr. Flores, the source of water for the ongoing mining is groundwater pumped from nearby wells. The EIR will address the issue of groundwater pumping impacts on Cache Creek. Division of Water Rights (Division) staff asked Mr. Flores to examine the issue of groundwater classification for appropriative water right purposes in the EIR. Mr. Flores agreed to this request.

The potential exists for impacts to the aquifers underlying Cache Creek due to aggregate mining; however, Division staff did not discover any reports or studies that document the existence of such problems. Yolo County intends to examine these issues in its EIR. State Water Board staff will review and comment on this document when it is circulated through the State Clearinghouse.

I hope the information in this letter is helpful to you. If you have questions regarding this letter, please call me at the number above.

Sincerely,

Edward C. Anton, Chief
Division of Water Rights

CHAPTER 15 REPORT OF WASTE DISCHARGE CHECKLIST

This checklist was prepared to aid in the review of reports of waste discharge for landfills,, surface impoundments, and waste piles. the items on the checklist are from sections in Chapter 15 dealing with what goes into a RWD for Class II and Class III WMUs. The Chapter 15 section number is in parentheses next to each section heading. As appropriate, some of the requirements for preparation of a RWD can be waived (Section 2590(a)), but only for Class III WMUs.

Version 5/91

Surface Water impoundment requirements from Regional Water Quality ~~Resources~~ Board

	X if not in RWD	X if RWD sufficient	Pg #	X if more info needed	X if cmnts attch'd	X if requirement waived (Class III only)
6. a. Projected volume and pattern of runoff for each WMU						
b. Peak stream discharges based on appropriate storm (see note in #4 for storm magnitude)						
7. Estimated wind rose for each WMU showing wind direction, velocity, and % of time for the indicated direction						
GEOLOGY						
1. a. A geologic map of the area						
b. Geologic cross-sections of each WMU showing lithology and structural features. Cross-sections shall be indexed to the geologic map.						
c. Do the cross-sections adequately portray geologic features relevant to discharge operations?						
2. A description of natural geologic materials in each WMU and its surroundings. This should include: a. Rock types						
b. Nature of alteration						
c. Depth and nature of weathering						
d. All other pertinent lithological data						
3. A description of the geologic structure of each WMU including: a. Attitude of bedding (if any)						
b. Thickness of beds (if any)						
c. Location, attitude and condition (tight, open, clay-or-gypsum filled, etc.) of any fractures						
d. Nature, type (anticline, syncline, etc.) and orientation of folds						

	X if not in RWD	X if RWD sufficient	Pg #	X if more info needed	X if cmnts attch'd	X if requirement waived (Class III only)
e. Location, attitude, and nature (tight, gouge-filled, etc.) of any faults						
f. All other structural criteria						
4. Results of a testing program for determination of physical and chemical properties of soils needed to formulate site design criteria						
5. a. A determination of the expected peak ground acceleration at each WMU associated with the maximum credible earthquake (class I or class II)						
b. A determination of the expected peak ground acceleration at each WMU associated with the maximum probable earthquake (class III)						
c. For a and b: i. Does the analysis consider local seismic conditions and faulting?						
ii. Does the analysis include modifications to allow for site-specific surface and subsurface conditions?						
iii. Is the method of analysis based on an identified procedure of publication?						
6. Using the expected peak ground acceleration the stability and factor of safety (FOS) for all embankments, cut slopes,and associated landfills during the design life of each WMU shall be calculated. The analysis shall include: a. Method used to calculate the FOS (Bishop's Method, etc.)						
b. Name of any computer program used to determine the FOS						
c. Description of the assumptions used in the stability analysis (height of fill, slope-and-bench configuration, etc.)						
7. Are any of the WMUs Class I? If so, see 2595(f)(6)						
8. If the WMU is a new or expansion Class II: i. Identification of known Holocene faults underlying the landfill						

	RWD	sufficient		needed	attch'd	III only)
5. a. Map showing location of all springs in the WMF and within 1 mile of its perimeter						
b. Tabular data indicating the flow and mineral quality of the water from each spring						
6. Is there enough detailed information in the RWD so that you can set water quality protection standards as per chapter 15, section 2552?						
7. a. Background water quality for an indicator parameter of waste constituent in GW: i. Based on quarterly sampling of wells upgradient from the WMU for one year						
ii. Analysis shall account for measurement errors in sampling and analysis						
iii. Analysis shall account for seasonal fluctuations in background water quality (if expected to affect concentration of hazardous constituent)						
b. If verification monitoring is in effect 7a can be waived and instead use appropriate water quality data NOTE: Non-upgradient wells may be used if: 1. Hydrogeologic conditions do not allow upgradient sampling OR 2. Sampling at other wells will provide a representative indication of background water quality						
c. When determining a background value for each indicator parameter or waste constituent: i. Use a minimum of 1 sample from each background well						
ii. If only 1 background well, 4 samples shall be obtained by splitting the sample into 4 aliquots and conducting a separate analysis for each aliquot						

	X if not in RWD	X if RWD sufficient	Pg #	X if more info needed	X if cmnts attch'd	X if requirement waived (Class III only)
LAND AND WATER USE						
1. Map showing locations of all water wells, oil wells, and geothermal wells in the WMU or within 1 mile of its perimeter						
2. Name and address of owner of each well indicated in #1						
3. Well information, where available, for each water well in #1. Should include, but not be limited to,: a. Total depth of well						
b. Diameter of casing at ground surface and total depth						
c. Type of well construction (cable-tool, rotary, etc.)						
d. Depth and type of perforations						
e. Name and address of well driller						
f. Year of well construction						
g. Use of well (ag, domestic, stock watering, etc.)						
h. Depth and type of seals						
i. Lithologic, geophysical, and other types of well logs						
j. Water levels, pump tests, water quality, and other well data						
4. Current land use within 1 mile of the perimeter of the WMU including: a. Types of land use						
b. Types of crops						
c. Types of livestock						

WASTE MANAGEMENT UNIT CHARACTERISTICS (2595)

not

TOPOGRAPHY

1. Map of WMU showing: a. Area within 1 mile radius						
b. Elevation contours						
c. Natural ground slopes						
d. Drainage patterns and other topographic features						
2. Info on location of facility with regards to the 100 year flood plain: a. Source of data included						
b. Federal Insurance Administration map included OR Calculations and maps used, if FIA map not available						

THE LEAGUE OF WOMEN VOTERS OF WOODLAND

P. O. Box 2463, Woodland, CA 95776

To: David Morrison, and Heidi Tschudin
From: Lois V. Linford, Natural Resources Chair, League of Women Voters of Woodland

Comments on CCRMP - January 15, 1996

The League is very concerned about the danger of flooding to Woodland. Since the streamway study from Yolo to the settling basin was not completed, will there be any consideration of that issue in this plan?

Would approve of the key assumption that the creek must be viewed as an integrated system, with an emphasis on the management of all of Cache Creek's resources, rather than a singular focus on any one issue.

The League feels that a clarification of the statement made in the second paragraph of page 5 is required. The statement is: "Although substantial progress was made, the effort was ultimately unsuccesful." The citizens felt the progress made was very succesful and were ready for the next step proposed by the County Development Director, Stephen Jenkins. It was the Supervisors, who were unhappy, and so chose to study it for over a year and further delay the process.

On page 11, second paragraph, the last sentence states that less than 3,000 acres of the total plan area is being considered for off-channel mining. Is this during the 30 year or the 50 year period?

Page 15, last paragraph, talks about a County Flood Ordinance? Is this an ordinance already in place? Does it contain a plan of action in case of flooding? Does it spell out city, county, and Yolo Flood responsibilities?

Page 16, second paragraph, - when writing about required approvals, negotiation with other agencies of jurisdiction is mentioned. What are these agencies and will their approval be negotiated before the CCRMP is finally adopted? Where are the responsbilities and efforts of all the different mentioned groups spelled out?

Page 17, second paragraph, calls for updating the CCRMP every ten years. This is too long a time frame. It does not allow for adverse impacts that ma occur sooner. It would seem five years is sufficient time for trends to become evident.

Page 18, last paragraph, and 19 speaks of the Test 3 Run boundary and says putting it into practice will require the excavation of some channel banks, that currently lie outside of the existing SW-G Zoned areas. This excavation will be on private land over which the County has no jurisdiction. Who pays and who sells the gravel? Does the County have a budget for flood control in Cache Creek?

Page 23, third paragraph, states new sources of information will be developed to do

the extensive monitoring and analysis for Creek monitoring. Who will be paying for this, the County? This seems vague and should be spelled out in this document.

Page 26. 2.4-8, How soon will this Memorandum of Understanding with the Yolo County Flood Control and Water Conservation District occur? Before the CCRMP is adopted?

Page 26,2.4-10, states that monitoring will be done by a variety of people. trained volunteers, landowners, public interest groups, the aggregate industry. and students. Is this wise? Will the data have consistency with so many different groups doing it and who will train them? This appears to be a very unreliable way to collect data!

Page 27, 2.4-13, The ten year term is again used for updating. Why not five?
2,5-1, Will the County Floodplain Administrator by a California registered Engineer? Is that not required?

Page 30, last paragraph, Believe the boron comes from Bear Creek, not saline springs located in the Rumsey Hills.

Page 31, second paragraph, The figure given as replenishment is 200,000 tons on average. But on page 21 this figure is given as 163,00 tons. Which is it?

Page 34, 3.4-2, When will these cooperative agreements with all the various agencies that will extend the provisions of the CCRMP outside the plan area be made? This sounds very good, but vague.
3.4-3, water quality. Annual testing of water quality is not enough. Should be oftener.

Page 37, last paragraph. Quote-" The lack of riparian vegetation has consequences for other aspectsof the creek system.. Water moves promptly downstream. rather than being delayed by vegetation. so that the potential for groundwater recharge is reduced." Is this correct? As the vegatation in the stream slows the velocity, it settles out the silt and seals off the bottom thus preventing recharge.

Page 57 entitled Present Conditions. - the last sentence in the first paragraph lists canoeing as a present recreational use. There is no canoeing between Capay and Yolo.
second paragraph, lists the Woodland Airport as a parachute jump site. This is at the Yolo Airport in the Plainfield area.

Page 64, Again. the statement is made that slowing surface water flows will improve in channel groundwater recharge. Instead, slowing stream velocities will cause silting which will waterproof the bottom thus reducing recharge.
second paragraph, The statement is made that aggregate producers will relinquish their existing permits that allow them to excavate within the active channel. Can these entitlements be revoked without compensation!

third paragraph, It is stated the County will file as the applicant for a surface mining permit in-channel. Can this be legally done?

Page 65, first paragraph. Would the County be required to do an EIR to have the aggregate companies remove the aggregate for channel shaping?
6.4-2, Again, does the County have the authority to do this?

Page 66, 6.4-3. Are "blanket permits" allowed in present State and Federal law?
6/4-5. Is not the County required by law to advertise for bids for projects as well as for the sale of assets?

Page 67, 6.5-6, This is not clearly written. Does this mean cross-slopes?
6.5-9. This will disturb the armour coat and cause erosion.

Lois V. Lionford

Lois V. Lionford
Submitted February 1, 1996

SYAR INDUSTRIES, INC.

February 5, 1996

Mr. David Morrison
Resource Management Coordinator
Yolo County Community Development Agency
292 West Beamer Street
Woodland, CA 95695

Subject: Syar Industries, Inc. Response to the *First Draft* Cache Creek Resources Management Plan (CCRMP) for Lower Cache Creek (December 4, 1995)

Dear Dave:

Following please find our comments and response to the First Draft CCRMP. We're confident that as this process continues, these issues will be addressed and clarified. If it would be helpful, we would be happy to meet with you to discuss these issues and offer our technical resources and experience from other river systems to aid in developing solutions in order to create a viable, all-encompassing river management program for Cache Creek and Yolo County.

Syar comment to *First Draft* of **C**ache **C**reek **R**esources **M**anagement **P**lan (CCRMP), dated December 4, 1995:

Page 15, Yolo County Flood Ordinance

...the Community Development Director also serves as the County's Floodplain Administrator. Under the County Flood Ordinance, he must review all projects in the floodplain to ensure they do not significantly raise flood levels. Could this be better served by a scientific review committee that understands the significance of river dynamics and can recommend proven alternatives and solutions?

Page 24, Goals 2.3-5

Allowing the streambed to aggrade may be inconsistent with promoting channel and river bank stability and safety.

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Page 26, Actions 2.4-8

The fact that there is rarely, if ever, sufficient precipitation to allow year round surface water flow in Cache Creek makes having an agreement with Yolo County Flood Control to allow it, highly unlikely in view of greater needs of agriculture. The program should provide an alternative that recognizes this reality.

Page 26, Actions 2.4-9

Funding from who?? There is no mention of how a "net gain" in sediment budget in one region and a net loss in another region will be balanced, or if they will not be balanced.

Page 26, Actions 2.4-11

Create a Technical Advisory Committee (TAC).....
We would like to see an expanded description of this committee (scientist from which disciplines, how many, and will the gravel interests be able to select a scientist representative?)

Page 27, Performance Standards 2.5-5

.....annual aggregate removal shall not exceed the amount of sand and gravel deposited the previous year, as determined by aerial photography analysis.

Is everyone in agreement that aerial photography can determine the amount of sand and gravel deposition each year? What specification criteria will be used?

Page 45, Objectives 4.3-1

This should be clarified so that it is not required that all disturbed areas be replanted if the removal of riparian habitat is necessary for flood control, etc.

Page 49, Performance Standards 4.5-4

These shallow terraces must be within the low-flow channel to avoid creating fish traps and unduly interfering with gravel bar build-up.

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Page 49, Performance Standards 4.5-9

This section needs revision. The procedure for cottonwood cuttings is not as stated here. Cuttings are collected when trees are dormant and kept in cold storage until ready for planting in the final location. They are not normally contract grown in nurseries.

Page 50, Performance Standards 4.5-11

Irrigation in the channel is not practical for many reasons, not the least of which is that any high flows would probably destroy it.

Page 60, Actions 5.4-5

The sizes of the locations affecting Syar are not clear, and of particular concern is the CR 89 location that is at our Madison Plant site. The industrial use is obviously incompatible with an Open Space zoning designation or recreational use.

Page 64, CCRMP Vision

It is inappropriate to require those aggregate producers who have vested rights under SMARA to relinquish those rights, particularly while those with vested rights not asking for off-channel permits are **not** required to relinquish their vested rights. More thought needs to be given that will recognize those rights, yet allow for implementation of the plan. In addition, we question whether it is practical to expect aggregate companies to do channel shaping, which will involve moving and grading large amounts of material at great expense, in exchange for rights to extract only the annually replenished amount of salable sand and aggregate. More thought needs to be given to a transition period that will allow for the producers to recover the cost of the environmental objectives.

Page 65, Actions 6.4-2

It is inappropriate to require those aggregate producers who have vested rights under SMARA to relinquish those rights.

Page 67, Performance Standards 6.5-6

Figure 12 does not appear to be accurate and should be re-examined. It is unusual for depositional areas to be steeper than non-depositional areas.

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Page 67, Performance Standards 6.5-8

Prohibition of mining within 150 feet of centerline of low flow channel (125 feet if channel is braided) is too restrictive for an effective river management program.

Page 74, Performance Standards 6.5-12

Current studies indicate that less than 25% of the bar is needed (approx. 10%) for the establishment of riparian habitat.

Page 74, Performance Standards 6.5-15

The undulating surface outside of the low flow channel should be re-examined from the point of view of creating undesirable areas that could trap fish during periods of high flow.

Page 74, Performance Standards 6.5-16

It is inappropriate to require those aggregate producers who have vested rights under SMARA to relinquish those rights.

Should you have any questions or desire additional clarification, please don't hesitate to let us know.

Sincerely,

Syar Industries, Inc.

John F. Perry
Vice President, Engineering

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February 13, 1996

David Morrison
Yolo County Community
Development Agency
292 West Beamer Street
Woodland, CA 95695

File: 843
Cache Creek

Dear Mr. Morrison:

Caltrans Structure Hydraulics has reviewed the "Technical Studies and Recommendations for the Lower Cache Creek Resource Management Plan" dated October 1995 and Notice of Preparation for the Cache Creek Resources Management Plan Draft Environmental Impact Report (DEIR) SCH #96013004. We commend the County for preparing a plan to manage their resources. The following, however, require further clarification, documentation, or study:

Extraction versus Replenishment

- NHC estimated the annual sand replenishment to be 114,000 tons on p. 3.3-24 and 160,700 tons on p. 3.3-29. This discrepancy should be clarified.

- The technical report identifies many of the problems experienced at the bridges including channel degradation and lateral channel migration p. 3.1-29. They point out that aggregate extraction has historically exceeded the estimated annual replenishment p. 3.3-29 and 3.3-32. And conclude that "a prolonged imbalance of this magnitude can contribute to severe local as well as region (reach averaged) channel changes (e.g., streambed lowering, bridge undermining, stream bank instability and impacts to riparian habitat)" p. 3.3-32. In fact, "since the early 1950s, aggregate removal has lowered the streambed by 15 to 25 feet in many places and narrowed the active channel to a fraction of its historical width" p. 3.6-1.

The following recommendations are made in the report to mitigate the impact of instream aggregate mining on bridges:

- The report recommends limiting in-channel aggregate extraction to approximately the volume of sand and gravel delivered annual to the study reach p. 6-4. How does the Local Agency propose to limit the extraction to approximately 200,000 tons when more than 3 million tons of gravel are currently allocated for annual extraction?

- The report recommends allowing one-time annual extractions "to provide bank protection or flood control benefits" and "regulated aggregate extraction to reshape and smoothe the channel at rates greater than the supply to the study

reach" p. 6-4. How will these actions impact infrastructure?

- The report recommends restricting "aggregate extraction using general or reach specific cross section templates" p.6-4. How can Caltrans work together with the Public Works Department to insure that the infrastructure is one of the factors accounted for in these reach specific templates?

- The report recommends synthesizing "individual in-channel mining reclamation plans into a single regional plan to achieve integrated (system-wide) management objectives" p.6-4. Caltrans commends and agrees with this approach, but would appreciate additional details on how this will be accomplished.

The report recommends various countermeasures to protect the bridges within the study reach:

- The report notes that "in reaches where channel lowering upstream or downstream from the bridge occurs annual because of in-channel aggregate mining, the bridge may become sediment starved resulting in accelerated scour and channel incision beneath the bridge" p. 3.6-15. We recognize these are reconnaissance and not design studies. The following should be considered in the final countermeasure design:

  - Place scour resistant rock donuts around the bridge piers and abutments. Although rock rip rap can be an effective countermeasure for local pier and/or contraction scour, its effectiveness at mitigating channel bed degradation is severely limited.

  - Extend or repair pier footings and/or pile caps. Caltrans agrees that this type of countermeasure can be prohibitively expensive. Our experience has shown that in riverbeds experiencing significant degradation, the cost to extend or repair pier foundations often approaches replacement cost

  - Install erosion resistant rock mattresses and rock or concrete sills to reduce local channel incision in the vicinity of bridges. Grade control structures can be effective countermeasures to control channel degradation. They do, however, have some significant drawbacks including potential for catastrophic failure, questionable environmental sensitivity (inhibit fish passage) and potential for undermining due to continued riverbed degradation.

In addition to the above mentioned challenges, please clarify who will pay for the countermeasure installation and monitoring?

SUMMARY MINUTES FROM SCOPING MEETING FOR THE CACHE CREEK RESOURCES MANAGEMENT PLAN (CCRMP) PROGRAM-LEVEL ENVIRONMENTAL IMPACT REPORT (EIR) HELD JANUARY 15, 1996

The meeting was opened at approximately 6:35pm by Heidi Tschudin, Project Manager. David Morrison, Resources Management Coordinator was introduced. The purpose of the meeting was described as three-fold: 1) to provide an understanding of the Cache Creek Resources Management Plan (CCRMP) and the planning process; 2) to receive comments on the scope and content of the CCRMP EIR beyond what was already identified in the NOP; and 3) to solicit suggestions regarding the appropriate scope of the alternatives analysis.

The audience was informed that the meeting was being taped, and that summary minutes would be prepared. Those wanting their comments verbatim in the record were informed to submit them in writing by the comment closure date of February 3, 1996 at 5:00pm.

A brief description of the project and proposed CEQA alternatives, and a summary of the proposed scope of the EIR were provided by Tschudin. EDAW was identified as the firm writing the EIRs for both the OCMP and the Cache Creek Resource Management Plan (CCRMP). Copies of the full Notice of Preparation and the CCRMP were provided to the audience.

The audience was informed that the Draft EIR for the CCRMP is expected to be released April 1st, that a hearing on the adequacy of the DEIR is expected May 1st, that the response to comments on the DEIR is expected in late June, and that hearings on the CCRMP are expected in July and August.

The meeting was opened to comments from the audience.

Lois Linford, League of Women Voters of Woodland: It is unfortunate that the meeting was held on that date. She knows of other people that would have attended had it been on a different day. The plans are moving so fast that there is no way for citizens to participate. The League protests the order of events. How can the miners already submit applications with no EIRs, comment period, or plans adopted? This presupposes that there will be mining. This is not the way it should go.

She does approve of viewing the creek as an integrated system. Because the study did not go from Yolo to the settling basin, the issue of flooding of Woodland remains. Is there any way the study can be expanded to include the settling basin?

Less than 3,000 acres for mining -- is this under the 30 year scenario or the 50 year scenario? She has never heard of the County Flood Ordinance. Page 16 of the plan requires various approvals. Where is this all this spelled out? Will it all be done prior to adoption?

The ten-year update is too long. Five years would be better -- it allows trends to become evident. What is the Test 3 Boundary?

Page 23, third paragraph mentions new sources of information for creek monitoring. Who will pay for this. This is not spelled out very well. Will the MOU with the Flood Control District occur before adoption of the CCRMP? The League is still concerned about water quality testing. Annual testing is not enough.

Sally Oliver: She began by reading a letter from Janet Levers representing the Cache Creek Coalition. The role for the public to participate has been diminished by scheduling the meeting on a federal holiday at an inconvenient time. When will there be a meeting at Esparto or Madison on a better time and date? Why hide behind a veil of inclusivity?

The EIR can not only give a 50-year assessment. It needs to look at 20- and 30-year periods.

She then went on to present her own views.

The EIR needs to address groundwater classification for appropriative water rights purposes. See the May 7, 1993 letter from the Division of Water Rights, and Sally's other letter. The CCRMP ordains off-channel mining and makes off-channel mining legal without scoping. This is a violation of the public trust by legalizing mining into drinking water without analysis by the EIR. The County is not allowing any questions to be addressed regarding environmental impact. This is illegal, covert, and a manipulation of the public trust.

How will the County regulations treat the groundwater and protect us from disease when surface water comes in contact with groundwater in off-channel mining? The list of questions from the Regional Water Quality Control Board regarding surface water impoundments must be addressed.

Mitzi Spiers, Environmental Issues Committee of the Yolo Grange: She endorses Lois's comments regarding the untimely process. She wants the EIR project manager to address the audience. Is the November 9th memorandum going to be responded to?

John Kemper: Speaking for himself only. In terms of technical comments, the terminology of various reaches and zones do not correspond one to one. Too confusing. Sub-reaches, zones, etc. In general, the plan is quite well done. Especially Chapter 4, Biological Resources. In one spot Reach 3 is identified as high recharge, then later it says the floor of the pits should be planted in riparian forest. This must be a mistake.

His major issue is in Chapter 5, the Open Space and Recreation Element, relating to public access interfering with property rights and increased vandalism. The term "parkway" is used which implies a highly connected set of trails. This would cause concern with the property owners. The objective, goals, and performance standards are better worded and should be maintained. The word "intensive" should be defined. There is a potential conflict in the plan between recreation nodes and what is identified in another chapter for wildlife habitat. He would like different language, as stated in his

comment letter. He is afraid the language may slip away by the end of the process. He is very supportive of it.

Establishment of a "safe harbor" program would be very good. No one wants projects along Cache Creek to interfere with farming activities.

Robert Spiers, Environmental Issues Committee of the Yolo Grange: Mitzi already identified the things disappointing to him. Especially Chapters 2 and 3. He finds the plan very disappointing. There is no substance or reason given for the statements. For example, there is very recent water quality data available. The 100-year floodplain is very arbitrary -- who defines it? The 1983, 1986, and 1995 events were all 100-year events. Why not 500-year flood? The pits will be there 500 years. The County Floodplain Administrator should be spelled out. Who is it? What is the Test 3 configuration?

The things that troubled him grossly are things that pollute the creek. For example agricultural run-off -- the Salsbery spill. The consultant is not helped by this information.

How do you make a landowner volunteer without giving him the confidence that it will mean something? That something will be accomplished?

The bit on quality of water leaves a lot to be expected. Things are not corrected pursuant to his November letter. What is the Technical Advisory Committee? Who is on there? Concerned citizens? Gravel industry?

These are just a few comments. There are a lot more. It is too hastily done without thought of what the consultants need.

There were no more NOP comments, however, members of the audience expressed concern that the representative from EDAW, John Pelka, was not going to make any remarks. Pelka proceeded to summarize the scope of work.

There was a question as to where recharge will be addressed. Heidi Tschudin identified that it would be addressed in the Hydrology chapter, to the extent that it is relevant. The staff encouraged the commentor (Oliver) to look at the scope and if it does not address her concerns, to submit written comments or give additional verbal comments.

Pelka explained which subconsultant or which member of his firm would be writing the different EIR sections.

Sally Oliver asked to speak again and indicated that the top priority of the EIR should be groundwater supply and drinking water for Woodland. All other topics should fall below that.

A question was asked whether the agricultural section will address economic impact. The staff indicated that it would not, nor would the EIR include economic analysis.

Mitzi Spiers indicated that was shocking.

Bob Spiers asked if the staff had looked at the Sonoma County RMS. Will we be comparing other area plans? Sonoma is rejecting terrace mining, why are we encouraging it?

The question was asked whether the EIR would look at continuous streamflow. Whether advisable or not, if it is not feasible then it should not be in the plan.

There was additional general discussion regarding the CCRMP and the EIR scope of work. At the conclusion of questions from the audience, the scoping meeting was adjourned.

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