

## Appendix K

---

Comments received on the  
NOP

## Comments on Notice of Preparation of Mad River EIR

<b>Date:</b>	<b>Sender:</b>	<b>Summary:</b>	<b>Contact:</b>
8/12/92	Ted Schuette, Simpson 822-0371	Map of extent of project area-- Simpson Bar drawn in by request.	
8/13/92	Donald C. Tuttle, Environmental Services Manager Public Works	Response to NOP of Draft EIR. He requests that the DEIR address the potential significant adverse effect of a lowered bed of the Mad River.	
8/18/92	Arthur Bolli General Manager, Humboldt Bay Municipal Water District 828 Seventh Street P.O. Box 95 Eureka, CA 95501 (707) 443-5018 Fax: (707) 443-5731	Lists specific concern; that the EIR identify the impact of gravel removal on streambed degradation. Related question: Can gravel removal be done in such a way as to optimize recruitment of bars that are currently degrading?	
8/18/92	James R. Bybee, Environmental Coordinator, Northern Area, United States Dept. of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service, Southwest Region, HCB 777 Sonoma Avenue, Rm 325 Santa Rosa, CA 95404	<p>Supports decision to undertake a DEIR. Suggests consideration of following issues: Any of project elements that require filling may require a Corps of Engineers Section 404 permit. Other projects may require a Section 10 permit. If there are enough elements requiring Corps permits, there may be enough to justify preparation of a DEIS/DEIR, to allow Federal review under NEPA and the Fish and Wildlife Coordination Act.</p> <p>Other less-damaging alternatives should be carefully considered to the dredging. Should do an analysis of annual need for gravel and the amount upland quarry gravels can meet that need. Possible minimum- impact alternative.</p> <p>Analysis of streambed degradation should not be limited to effects at bridges, water intakes, etc. Should look at the river as a whole.</p> <p>This DEIR should consider pro-active ways in which mining projects and reclamation could be used to restore salmon habitat.</p> <p>DEIR should develop a management/monitoring plan that will provide the data and expertise to allow annual scientific assessment.</p>	James R. Bybee or Chris Mobley (707) 578-7513.

8/21/92	Christine Kinne Acting Deputy Director, Permit Assistance, State of California, Governor's Office of Planning and Research, 1400 Tenth Street, Sacramento, CA 95814	Copy of letter to reviewing agencies from State of California. SCH #92083049.	Michael Chiriatti, (916) 445-0613.
8/24/92	W.B. Lindsey, Hydrology/ Hydraulics Engineer California Dept. of Transportation, Division of Structures, P.O. Box 924874 Sacramento, CA 94274- 0001 Fax (916) 455-0574 TDD (916) 445-5945	Concerned with the potential adverse effects of long term, large scale extraction operations on any river environment.  Program scope should assess gravel extraction's <b>past</b> and potential future impacts on instream bridge structures.  Caltrans recommends developing a Gravel Management Plan similar to that proposed in the Eel River EIR.  Caltrans requests inclusion on the State Agency Technical Advisory Committee for preparation of the EIR.	Cathy Crossett, (916) 327-3218, Fax: (916) 327-2179
8/27/92	Patricia L. Secoy, Chief, Transportation Planning Branch, California Dept. of Transportation, District 1, P.O. Box 3700 Eureka, CA 95502-3700 (707) 445-6412 TDD (707) 445-6463	SCH No: 92083048  The DEIR should include a traffic analysis of the following: -The existing traffic conditions -The cumulative traffic impacts and all known planned development in the area -The necessary traffic mitigation and implementation responsibilities -Access route to the State Highway system for each project -Anticipated number of hauling trips -Time period the trucks would be hauling -Access of hauling trucks to scales -Complete travel route of loaded trucks -Comparison of past hauling volumes per project to anticipated volumes -The use of rail to transport gravel.	Dave Carstensen, (707) 441-5813
8/28/92	James S. Pompy, Mined- Land Reclamation Project Manager, Dept. of Conservation, Division of Mines and Geology, Mined-Land Reclamation Program, 801 K Street, MS 09-37 Sacramento, CA 95814- 3531	Response to invitation to 8/28/92 scoping meeting. Did not receive notice until 8/27/92, so will be unable to attend. Response faxed and mailed.	

8/30/92	Susie Van Kirk, Conservation Chair, Sierra Club, Redwood Chapter North Group P.O. Box 238 Arcata, CA 95521	<p>Important issues which need to be resolved before any action is taken to implement the preparation of an EIR for the Mad River: Identification of the project, and the County's process for selecting the consultant.</p> <p>Point made that the Eel River Gravel EIR is not a river management plan, but an assessment of a number of specific gravel extraction operations. The EIR states that the plan will be written at a later date. This limited focus is a critical flaw, and should not be repeated in this EIR.</p> <p>She makes the point that the river has value as an integral part of the landscape, and the ecological functions of this landscape transcends the needs of the gravel industry.</p> <p>She also makes the point that gravel is only one of many uses for the Mad River. Each use must be identified and fully recognized for its value, and for compatibility or incompatibility with other values.</p> <p>Selection of a consultant must be without bias. The job must be widely advertised and select a firm with professional expertise.</p>	
8/31/92	David S. Krueger, Attorney, P.O. Box 649 Arcata, CA 95521 (707) 839-5971	<p>He feels it is important that there be a complete project description, especially that it clearly delineate the intended uses of the EIR.</p> <p>He is concerned that planning regarding the Mad River should focus on restoration, not maintaining the status quo. It should focus on opportunities, not just problems. He wants mining at alternative locations to be considered along with the no action alternative.</p> <p>See letter for many other points.</p>	
9/6/92	J.R. McCollister, Unit Chief, Dept. of Forestry and Fire Protection 118 S. Fortuna Blvd. Fortuna, CA 95540 (707) 725-4413, 725-4572	From review of NOP, it appears proposed extraction will not disturb timbered areas.	Steve H. Hubbard, Environmental Coordinator

<p>9/10/92</p>	<p>Wayne S. White, Field Supervisor U.S. Dept. of the Interior, Fish and Wildlife Service, Fish and Wildlife Enhancement, Sacramento Field Office 2800 Cotage Way, Room E-1803 Sacramento, CA 95825-1846</p>	<p>Strongly supports the preparation of a comprehensive EIR. Specific comments that should be incorporated:</p> <ol style="list-style-type: none"> <li>1. Alternatives analysis in the DEIR should include a discussion of upland sites and alternative sources.</li> <li>2. Development of a thorough monitoring program that assess gravel recruitment and changes in bed morphology.</li> <li>3. Should consider the environmental impacts associated with processing water, especially groundwater pumping. Appropriate mitigation measures such as a water budget for individual projects that prevent groundwater overdrafting.</li> <li>4. Extraction methods should focus on restoring and enhancing in-stream and riparian habitat conditions for salmonids and steelhead.</li> </ol> <p>See enclosures for more.</p>	<p>Jim Browning, (916) 978-4613</p>
<p>9/14/92</p>	<p>Thomas B. Dunbar, Associate Water Resource Control Engineer California Regional Water Quality Control Board North Coast Region 5550 Skyline Blvd., Suite A Santa Rosa, CA 95403 (707) 576-2220</p>	<p>See the EIR for gravel extraction on the Eel River prepared by Public Works earlier in 1992 for a good description of CRWQCB's concerns.</p> <p>If the equipment does not operate in the flowing stream and muddy washwater is not discharged into the stream, surface mining of sand and gravel from river bars is not a water quality issue. Enforcement of the Fish and Game Code adequately protects water quality due to streambed alteration agreements with gravel mining operators.</p> <p>Describes Corps of Engineers Permits and Stormwater Permits.</p>	

<p>9/15/92</p>	<p>Banky E. Curtis, Regional Manager California Dept. of Fish and Game 601 Locust Street Redding, CA 96001 (916) 225-2300</p>	<p>Permitted gravel could all be extracted from upper channel and shared with all permitted users. Certain amounts of gravel could be "allowed" to pass downstream in order to support channel morphology needs in downstream reaches.</p> <p>Gravel extraction upstream could be further limited in order to allow transfer of gravel downstream to sites where it could be extracted at permitted sites and/or used to support channel morphology needs in downstream reaches.</p> <p>Channel morphology needs to include maintaining channel confinement and channel stability, minimizing adverse impacts on natural erosion processes, as well as protecting the needs of riparian vegetation, protection of fish and wildlife resources, protection of groundwater levels, and protection of human infrastructure.</p>	<p>For questions, and in order to set up the first meeting, contact: David Hoopaugh, Environmental Specialist III, Department of Fish and Game, 601 Locust Street Redding, CA 96001. (916) 225-2373</p>
<p>9/18/92</p>	<p>Stephen F. Crook Acting Executive Director North Coast Railroad Authority P.O. Box 1211 Eureka, CA 95502 (707) 441-1625 Fax: (707) 441-1324</p>	<p>Refer to correspondence regarding preparation of a DEIR on surface mining of sand and gravel on the Mad River.</p> <p>Gravel extraction operations have had devastating effects on NCR's A&amp;MR Division Bridge. The bridge footings have been exposed due to degradation of the gravel and river bed. If not corrected, the bridge could be lost. Consulting engineers estimate repairs may cost in excess of \$75,000. A full description of needed repairs should be available in Nov., 1992.</p> <p>If funds are made available to compensate for these and future repairs, NCRA would like to work with any and all parties so secure reimbursement.</p>	

<p>9/21/92</p>	<p>Dwight E. Sanders  Chief, Division of  Environmental Planning  and Management  California State Lands  Commission  Executive Office  1807 13th Street  Sacramento, CA 95814</p>	<p>File Ref: SD 92-08-17.3  W 24873</p> <p>Proposed project includes sovereign and trust lands of the Mad River. Calif. holds a fee ownership in the bed of the reiver between two ordinary low water marks. Entire river between ordinary high water marks is subject to Public Trust Easement. Both under jurisdiction of SLC. Exact location of State's sovereign interest relative to project sites not yet determined. Contact Linda Martinez regarding extent of SLC's jurisdiction.</p> <p>SLC staff agrees with concerns expressed by Dept. of Fish and Wildlife (9/15/92 letter). See letter for comments and concerns.</p> <p>Mad River is a Limited Use Area. Commission staff is also concerned with potential stream crossings associated with mining and/or gravel extraction. Will activity affect existing public use? If crossing is involved, is the crossing of sufficient height for safe passage under the structure?</p>	<p>Linda Martinez  (916) 322-6375  (SLC jurisdiction)  Questions:  Dr. Diana Jacobs,  (916) 445-5034.</p>
----------------	--	--	---

<p>9/21/92</p>	<p>Deborah Herrmann, Environmental Program Coordinator California Dept. of Conservation 801 K Street Sacramento, CA 95814- 3514 (916) 445-8733</p>	<p>SCH #92083049</p> <p>The EIR should include characterization of slope, sinuosity, width and depth of the low flow channel, and overbank areas of the river from the Swasey dam site to the mouth at Mad River estuary. Rates of change over time in these parameters should be measured.</p> <p>EIR should include a sediment budget for the Mad River.</p> <p>Study area should be examined in terms of possible correlation between mining rates, changes in cross sectional area, and the severity of the water year.</p> <p>EIR should present a design and implementation plan for a program to document future physical changes in channel configuration which may occur over time.</p> <p>EIR should examine hydraulic implications to alternative mining.</p> <p>EIR should examine potential impacts to groundwater storage and recharge from streambed degradation (lowering).</p> <p>EIR should examine past and future aggregate supply and demand, uses, specifications, production and possible alternative sources.</p> <p>Request that Dept. of Conservation be included on State Agency Technical Advisory Committee in preparation of the EIR.</p> <p>Reclamation plans must conform to the mitigation measures that are indicated for the adopted mining alternative. Send all required amendments to James Pompy, Mined-Land Reclamation Program Manager for review and comment.</p>	<p>Deborah Herrmann Environmental Program Coordinator (916) 324-4026</p> <p>Contact for State Agency Technical Advisory Committee formation: Michael Sandecki, Division of Mines and Geology (916) 324-4026</p> <p>Send required amendments to the reclamation plans impacted by the EIR to: James Pompy, Mined-Land Reclamation Program Manager</p>
----------------	--	---	--



9/22/92	John Rogerson, Chairman City of Blue Lake Planning Commission City Hall, 111 Greenwood Ave., P.O. Box 458 Blue Lake, CA 95525 (707) 668-5655	NOP of EIR discussed at regular 9/21/92 Blue Lake Planning Commission meeting. The Commission concurred with the items identified as potentially significant environmental effects, and wants them to be adequately addressed.  Other specific concerns: 1. Impacts of number of trucks traffic passing through center of town, through commercial and residential areas, and near the elementary school 2. Possible degradation to and undermining of the flood control levee. 3. Possible undermining of the railroad bridge containing the pipe to the city's water supply. 4. Impact to recreation/ sport fishing. 5. Continued availability of gravel for local construction needs as opposed to exports.	
9/24/92	Karen Nessler City Clerk City of Blue Lake Planning Commission City Hall, 111 Greenwood Ave., P.O. Box 458 Blue Lake, CA 95525 (707) 668-5655	Blue Lake City Council voted unanimously to support the BL Planning Commission's comments and concerns in their letter (9/22/92).	
10/16/92	Bruce Hunner P.O. Box 1011 Arcata, CA 95521	Gravel operation close to E/O Market on Highway 299 (Eureka Ready Mix?) is across the river from his home. Although recently quieted, in past years of operation the company has shown blatant disregard for civic peace on weekends, starting operation as early as 6:00 am on Saturday and Sunday mornings. If they are allowed to take more gravel, they should not be allowed to do it at early times on weekends. He states that he doesn't live in the country to have his peace and quiet shattered by some firm operating only with profits in mind.	

10/20/92	<p>Karen Nessler  City Clerk  City of Blue Lake  Planning Commission  City Hall,  111 Greenwood Ave., P.O.  Box 458  Blue Lake, CA 95525  (707) 668-5655</p>	<p>NOP discussed by Blue Lake City Council at 10/13/92 meeting. Requests consideration on the following concerns:</p> <ol style="list-style-type: none"> <li>1. City of Blue Lake has a wastewater treatment plant and ponds protected by a rock slope on the Mad River.</li> <li>2. Blue Lake is responsible for maintaining a levee down river from Hatchery Road, West of the bridge.</li> <li>3. In the early 80's a bridge was destroyed by debris build-up, which weakened the piers. Blue Lake Volunteer Fire Dist. depends on this bridge.</li> <li>4. A water line is connected to the railroad bridge at Essex. This carries water to the City of Blue Lake, consumers on Glendale Rd., and some commercial users.</li> <li>5. City of Blue Lake is not opposed to gravel extraction from the Mad River Gravel Bar. It may have different affects on the river.</li> </ol>	
----------	--	--	--