

**CALFED BAY-DELTA PROGRAM
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT/
ENVIRONMENTAL IMPACT REPORT
ECOSYSTEM RESTORATION PROGRAM PLAN - VOLUME I**

Please refer to Page 288. The first paragraph under *Stressor Description* states that “1.53 million tons of aggregate were mined in Tehama and Shasta Counties in 1992.” The context of this statement implies that this aggregate was all removed from rivers and streams. This statement is misleading in that more than half of the aggregate mined in Shasta County in 1992 came from quarries, and, therefore, was not alluvial sand or gravel. It is also notable that in 1992 there was only one in-stream mining operation in Shasta County.

Please refer to Page 289. The first full paragraph in the second column states: “*Typical extraction rates exceed the average annual yield of gravel from upstream areas.*” It is not clear what source of information was used to determine these “typical” extraction rates. While it may be true that historically extraction rates have exceeded yields, most conditional use permits for in-stream mining issued in California in the last 10 to 15 years do not permit extraction rates to exceed annual yield. Review of aggregate resource management plans from counties such as Sonoma, Yolo and Lake, would show that such stream degradation is not permitted. In other counties which do not have specific in-stream mining policies, mitigations required under CEQA would prevent streambed degradation.

Please refer to Page 289. The last paragraph states: “*All vegetative cover and fluvial landforms must be removed to gain access to the mining site and to clean and sort gravel for commercial uses. These habitats may not be replaced until in-stream mining ceases.*” This statement may be true historically, however, conditional use permits issued in California in recent years usually require protection and non-disturbance of some or all riparian vegetation areas. In addition, many permits require concurrent reclamation, so that soil and vegetation is replaced as the mining progresses from one area to the next on a specific site.

Please refer to Page 290. The second paragraph discusses problems with disturbance from in-stream mines. While it is true that non-native invasive species can be a problem on disturbed mine sites, all mining operations are required to have reclamation plans, which usually include comprehensive revegetation with native species, and eradication of non-native invasive species.

Please refer to Page 290. The first full paragraph in the second column recommends reducing or eliminating in-stream gravel extraction. In some cases in-stream gravel mining operations may have a beneficial effect to prevent flooding and bank erosion, protect structures, and provide clean and sorted spawning gravel. In some instances, upstream land uses including agriculture, forestry, and urban development, have actually increased stream bedloads, causing streambed aggradation, and increasing the potential for flooding and damage to bridges and other structures. Additional fine sediment load can also smother spawning gravel.

Potential impacts and mitigations for in-stream mining, gravel bar skimming and terrace gravel operations should be evaluated on a case-by-case basis, and should be permitted, provided that an acceptable stream management plan is prepared.

Please refer to Page 291, regarding the paragraph entitled Linkage With Other Ecosystem Elements, it is

true that in-stream mining has the potential to cause adverse environmental impacts. However, careful planning and mitigation of gravel operations can eliminate adverse impacts, and gravel operations may actually have a beneficial effect by enhancing flooding control, structure protection riparian vegetation and fish and wildlife habitat.

Please refer to Page 291. The first paragraph in the second column recommends promotion of alternative gravel sources. This may not be as easy as it seems. The recent Mineral Land Classification study for Shasta County by the California Division of Mines and Geology determined that sources for portland cement concrete grade aggregate material were found only in in-stream and terrace deposits, and that Shasta County has a relatively limited supply of such material. Material from other sources and locations is not as rounded, clean and hard, and is, therefore, more costly and difficult to use.