

POST OFFICE BOX 47
YOUNTVILLE, CALIFORNIA 94599
(707) 944-5500

November 14, 1991

Mr. Frank Lynch
County of Mendocino
Department of Planning and Building Services
Courthouse
Ukiah, California 95482

Dear Mr. Lynch:

UM 9-86/91 (Hay), U 36-91 (Ishizaki), U 37-91 (Hay); U 38-91 (Stornetta/Hay), Affecting
The Garcia River, Mendocino County

Department of Fish and Game personnel have reviewed the Notice of Preparation of a draft Environmental Impact Report (EIR) for the subject use permit applications. The Department has the following comments regarding the scope and content of the proposed EIR:

1. An analysis should be completed which examines the cumulative impacts of this project in relation to both currently permitted and pending gravel mining operations within the Garcia River watershed.
2. A comprehensive monitoring program shall be developed. Said program shall include annual transects of affected gravel bars, photo transects, and monitoring of nearby pool, riffle and run habitats.
3. A complete review of existing mining methods. This review will examine those methods that maintain and/or degrade the characteristics of the Garcia River that are of importance to fish and wildlife resources.
4. Development of new methodologies for in-stream gravel extraction. The formation and adoption of new gravel mining methods shall be based on their ability to maintain and/or improve fish, wildlife, and water resources.

Mr. Frank Lynch
November 14,
1991 Page Two

5. A contingency program shall be developed in the event circumstances arise which warrant significant reductions in the annual harvest rate. Circumstances such as drought may affect gravel recruitment to the point that mining operations may have to be curtailed in order to protect the river's physical and/or biological character. A contingency plan should be developed which gives the operator the ability to curtail in-stream gravel mining for the benefit of fish and wildlife resources.
6. In addition to a "No Project" alternative, off-stream quarry sites and a combination of quarry and in-stream sites should be included as options under the Project Alternatives section of the draft EIR.
7. No debris, soil, silt, cement, oil, or other such foreign substance shall be allowed to enter into or placed where it may be washed by rainfall or runoff into waters of the State. When operations are completed, any excess materials or debris shall be removed from the work area.

We have been advised that the Mendocino County Water Agency and the Department of Planning and Building Services have secured a grant which will be used toward the eventual development of a gravel management plan for the Garcia River. Following the completion of this plan, regulatory agencies will have updated information with which to base future management decisions. The plan is scheduled to be completed by September, 1994. Therefore, we recommend that new gravel mining projects affecting the Garcia River be permitted to expire on or near September, 1994.

Based on our review, we conclude that the project has the potential to adversely affect fish and wildlife and, as such, is subject to a filing fee pursuant to Fish and Game Code Section 711.4 (AB 3158). If an Environmental Impact Report is filed by Mendocino County pursuant to Public Resources Code Section 21080 (c), the fee will be \$850 payable to the County Clerk when the Notice of Determination is filed.

The Department has jurisdiction under Fish and Game Code sections 1601-03 in regard to any proposed activities that would divert or obstruct the natural flow or change the bed, channel, or bank of any stream or lake. We recommend early consultation since modification of the proposed project may be required to avoid impacts to fish and wildlife resources. Formal notification under Fish and Game Code Section 1603 should be made after all other permits and certification have been obtained. Work cannot be initiated until a streambed alteration agreement is executed.

Mr. Frank Lynch
November 14, 1991
Page Three

If you have any questions or concerns regarding these comments, contact Mr. Rick Macedo, Fishery Biologist, at (707) 928-4369; or Mr. Larry Week, Associate Fishery Biologist, at (707) 944-5526.

Sincerely,



Brian Hunter
Regional Manager
Region 3

cc: Dennis Jackson
Mendocino Water Agency
Courthouse
Ukiah, CA 95482

James Bybee
NMFS
777 Sonoma Avenue, Room 325
Santa Rosa, CA 95404

Wayne White
USFWS
2800 Cottage Way, Room E 1803
Sacramento, CA 95825

John Hooper
201 Buena Vista Avenue East
San Francisco, CA 94117

Mendocino County Resource Conservation District 405
Orchard Ave. Ukiah, CA 95482

Nicholas King
FROG
P. O. Box 235
Point Arena, CA 95468

Bill Hay
Bed Rock Inc.
135 Riverside Dr.
Point Arena, CA 95468

bc: Mr. R. Macedo, Mr. W. Jones, Mr. J. Booth, Lt. F. Russell, Wdn. K. Hofer,
Mr. J. Emig, Mr. K. Aasen, Mr. L. Week, R.P.C. Monroe, Mr. B. Cox
G. Heise (ESD - Hdqtrs.)

RAM/jp