

INFORMATION HANDOUT

PERMITS

STATE OF CALIFORNIA
DEPARTMENT OF FISH AND GAME

Notification No. 1600-2005-0122-R6

MATERIALS INFORMATION

OPTIONAL DISPOSAL/MATERIAL SITES

ROUTE: 09-Iny-136-14.6/17.6
09-Iny-190-11.1/24.4

DEPARTMENT OF FISH AND GAME

http://www.dfg.ca.gov
Eastern Sierra-Inland Deserts Region
407 East Line Street
Bishop, California 93514
Phone (760) 872-1171
Fax (760) 872-1284



Notification No. 1600-2005-0122-R6

June 28, 2005

AGREEMENT REGARDING PROPOSED STREAM OR LAKE ALTERATION

THIS AGREEMENT, entered into between the State of California, Department of Fish and Game, hereinafter called the **Department**, and Mr. Mark Heckman, California Department of Transportation, 500 S. Main Street, Bishop, California, 93514, Phone (760) 872-0734, State of California, here after called the **Operator**, is as follows:

WHEREAS, pursuant to Section 1602 of the California Fish and Game Code, the Operator, on the 24th day of February, 2005, notified the Department that they intend to divert or obstruct the natural flow of, or change the bed, channel, or bank of, or use material from the streambed(s) of the following water(s): Various dry streambeds, channels, washes and banks within Inyo and Mono Counties within the immediate vicinity of man-made facilities or structures.

WHEREAS, the Department (represented by Dawne Becker) has determined that such construction may substantially adversely affect those existing fish and wildlife resources within the various dry streambeds, channels, washes, and banks referenced above in paragraph 2 of this page, including songbirds, raptors, other birds, reptiles, mammals, amphibians, plants and all other fish and wildlife resources, including that riparian vegetation which provides habitat for such species, in the area.

THEREFORE, the Department hereby proposes measures to protect fish and wildlife resources during the **Operator's** work. The Operator hereby agrees to accept the following measures/conditions as part of the proposed work.

If the Operator's work changes from that stated in the notification specified above, this Agreement is no longer valid and a new notification shall be submitted to the Department of Fish and Game. Failure to comply with the provisions of this Agreement and with other pertinent code sections, including but not limited to Fish and Game Code Sections 5650, 5652, 5937, and 5948, may result in prosecution.

Nothing in this Agreement authorizes the Operator to trespass on any land or property, nor does it relieve the Operator of responsibility for compliance with applicable federal, state, or local laws or ordinances. A consummated Agreement does not constitute Department of Fish and Game endorsement of the proposed operation, or assure the Department's concurrence with permits required from other agencies.

This Agreement becomes **effective the date of Department's signature and terminates on July 1, 2010** for construction of the proposed project only. This Agreement shall remain in effect for that time necessary to satisfy the terms/conditions of this Agreement. Any provisions of the agreement may be amended at any time provided such amendment is agreed to in writing by both parties. Mutually approved amendments become part of the original agreement and are subject to all previously negotiated provisions. The Operator may request an extension of the agreement annually for a 12-month period if additional construction time is necessary. The extension shall be requested prior to the termination date of the agreement.

1. The following provisions constitute the limit of activities agreed to and resolved by this Agreement. The

STREAMBED ALTERATION AGREEMENT FOR NOTIFICATION NUMBER: 1600-2005-0122-R6
June 28, 2005

signing of this Agreement does not imply that the Operator is precluded from doing other activities at the site. However, activities not specifically agreed to and resolved by this Agreement shall be subject to separate notification pursuant to Fish and Game Code Sections 1600 et seq.

Project/Site Description

2. Perform channel maintenance activities in dry conditions to facilitate eventual stream flow. Routine maintenance would include removing sediments, vegetation, debris or trash from dry culverts, drop inlets, and/or dry inlet and outlet ditches. Replacement of failing or undersized culverts during no flow conditions is also permitted. The maintenance may be performed with either hand tools within the channel or equipment operated from the top of the bank. Work within the channel shall not exceed more than 100 feet upstream or downstream from the centerline of the facility.
3. The Operator shall not impact more than 100 linear feet of Departmental jurisdictional waters per site. If impacts to drainages and riparian habitat exceed that authorized in Condition 2 of the Agreement, the Operator shall mitigate at a minimum 5:1 replacement-to-impact ratio for the impacts beyond those previously authorized by this Agreement. All mitigation shall be approved by the Department.
4. If mitigation is necessary, the Department recommends the use of native plants to the greatest extent feasible in the landscaped areas adjacent and/or near the mitigation/open space areas and within or adjacent to stream channels. The Operator shall not plant, seed or otherwise introduce invasive exotic plant species to the landscaped areas adjacent and/or near the mitigation/open space areas and within or adjacent to stream channels (minimum 100 foot setback from open space areas and 150 foot setback from stream channels and riparian mitigation sites). Invasive exotic plant species not to be used include those species listed on Lists A & B of the California Exotic Pest Plant Council's list of "Exotic Pest Plants of Greatest Ecological Concern in California as of October 1999." A copy of the list can be obtained by contacting the California Exotic Pest Plant Council at 32912 Calle del Tesoro San Juan Capistrano, CA 92675. The Operator shall submit a copy of the draft landscape/planting plan to the Department's representative for review at least 30 days prior to the acquisition and/or use of any plant materials (seeds or container plants) adjacent to the mitigation/open space site and/or within or adjacent to any stream channel. All accessible tamarisk (*Tamarix ramosissima*) commonly referred to as saltcedar, *Eleaagnus angustifolia* commonly referred to as Russian olive and giant reed (*Arundo donax*) commonly referred to as arundo or false bamboo, shall be properly removed and disposed of within the limits of this Agreement.
5. A. No more than 15 days prior to ground disturbing activities, the Operator shall have a qualified, permitted biologist conduct focused surveys for burrowing owls within and adjacent to the project site (within 300 feet of the project site) to locate burrowing owls. Surveys shall follow the 1993 Burrowing Owl Consortium protocol guidelines.

B. If burrowing owls are found adjacent to the project site (within 300 feet of the project site), no project activities shall occur within 300 feet of occupied burrows during the breeding season (February 1 through August 31) to avoid indirect impacts to burrowing owls within areas adjacent to the site.

Project Construction

6. Maintenance activities may be performed at anytime providing the Operator uses best management practices. If work needs to occur from March 15 through September 15, the Applicant shall have a

STREAMBED ALTERATION AGREEMENT FOR NOTIFICATION NUMBER: 1600-2005-0122-R6

June 28, 2005

qualified biologist survey all potential nesting vegetation within the project site for nesting birds, prior to project activities (including construction and/or site preparation). Surveys shall be conducted once a week for eight consecutive weeks, at the appropriate time of day during the breeding season, and surveys shall end no more than three days prior to clearing. Documentation of surveys and findings, shall be submitted to the Department for review and concurrence prior to conducting project activities. If no nesting birds were observed and concurrence was received from the Department, project activities may begin. If an active bird nest is located, the nest site shall be fenced a minimum of 200 feet (500 feet for raptors) in all directions, and this area shall not be disturbed until after September 15 and until the nest becomes inactive. If threatened or endangered species are observed in the area, no work shall occur during the breeding season (March 15 through September 15) to avoid direct or indirect (noise) take of listed species and State and/or Federal threatened/endangered species permits shall be obtained prior to commencing project activities.

7. If rare, threatened or endangered species occur within the proposed work area, or could be impacted by the work proposed, this Agreement shall not be valid and the Operator shall not proceed with the project until the Operator consults with the Department and obtains any required State and/or Federal permits.

8. Also included in this Agreement are provisions associated with dry drainage structures and/or stream/river crossings **along the Amargosa River along HWY 127 north of Shoshone from PM 20 north to PM 34, and along HWY 178 at PM 43.5 in Inyo County; and at the intersection of the Amargosa River and Route 127 at PM 32 in San Bernardino County.** Agreed work includes activity associated with the routine maintenance of existing drainage culverts and other structures, and an additional undetermined number of road shoulder and road shoulder collection ditches, **all within 100 feet of State Routes 127 or 178 and not associated with wetted streambeds.** Separate Notification and Agreement shall be required concerning the wetted areas of the AMARGOSA RIVER and for those projects more than 100 feet from State Routes 127 or 178 and those areas south of Shoshone in Inyo County, except at the intersection of the Amargosa River and Route 127 at PM 32 in San Bernardino County.

9. The Operator either certifies by signing this Agreement that no impacts shall occur to rare, threatened or endangered species in the proposed project areas, or shall have a qualified Biologist survey all areas of expected impact within the Amargosa River for Southwestern willow flycatcher (*Empidonax traillii extimus*) which is a Federally Endangered species, also Least Bell's vireo (*Vireo bellii pusillus*), Amargosa nitrophila (*Nitrophila mohavensis*) and the Amargosa Vole (*Microtus californicus scirpensis*), which are all State and Federally Endangered species, prior to conducting any project activities that may result in take of any of the above species. The Operator shall provide the survey results to the Department for review and approval, and shall comply with Fish and Game Code 2080 and 2081 prior to commencing any project activities where take of the above species may occur. The Operator shall be limited to maintenance activities within 100 feet of State Routes 127 or 178 until the time that such approved surveys indicate additional maintenance work can be completed without threat to these endangered species. The provisions of this Agreement may then be amended by mutually approved written agreement between both parties.

10. The Operator shall not allow water containing mud, silt or other pollutants from aggregate washing or other activities to enter a lake or flowing stream or placed in locations that may be subjected to high storm flows.

11. The Operator shall comply with all litter and pollution laws. All contractors, subcontractors and employees shall also obey these laws and it shall be the responsibility of the operator to ensure compliance.

STREAMBED ALTERATION AGREEMENT FOR NOTIFICATION NUMBER: 1600-2005-0122-R6
June 28, 2005

12. The Operator will make all attempts to prevent the introduction of any invasive plants or animals in project areas.
13. Spoil sites shall not be located within a stream/lake, where spoil shall be washed back into a stream/lake, or where it will cover aquatic or riparian vegetation.
14. Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous to aquatic life, resulting from project related activities shall be prevented from contaminating the soil and/or entering the waters of the state. These materials, placed within or where they may enter a stream/lake, by Operator or any party working under contract, or with the permission of the Operator shall be removed immediately.
15. No broken concrete, debris, soil, silt, sand, bark, slash, sawdust, rubbish, cement or concrete or washings thereof, oil or petroleum products or other organic or earthen material from any construction, or associated activity of whatever nature 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. No rubbish shall be deposited within 150 feet of the high water mark of any stream or lake.
16. No equipment maintenance shall be done within or near any stream channel where petroleum products or other pollutants from the equipment may enter these areas under any flow.
17. The Operator shall notify the Department, in writing, at least five (5) days prior to initiation of construction (project) activities and at least five (5) days prior to completion of construction (project) activities. Notification shall be sent to the Department at 407 West Line St; Bishop, CA 93514, Attn: Streambed Alteration Agreement. Please reference SAA # 1600-2005-0121-R6.
18. The Operator shall **provide a copy of this Agreement to all contractors, subcontractors, and the Applicant's project supervisors. Copies of the Agreement shall be readily available at work sites at all times during periods of active work** and must be presented to any Department personnel, or personnel from another agency upon demand.
19. The Department reserves the right to enter the project site at any time to ensure compliance with terms/conditions of this Agreement.

Extension of Agreement

20. The Operator shall request an extension of this agreement prior to its termination. Extensions may be granted for up to 12 months from the date of termination of the agreement and are subject to Departmental approval. The extension request and fees shall be submitted to the Department's Region 6 Office at the above address. If the Operator fails to request the extension prior to the agreement's termination then the Operator shall submit a new notification with fees and required information to the Department. Any activities conducted under an expired agreement are a violation of Fish and Game Code Section 1600 et. seq.

Suspension of Permit

21. The Department reserves the right to suspend or cancel this Agreement, after giving notice to the Operator, if the Department determines that the Operator has breached any of the terms or conditions of this Agreement, or for other reasons, including but not limited to the following:

STREAMBED ALTERATION AGREEMENT FOR NOTIFICATION NUMBER: 1600-2005-0122-R6
June 28, 2005

- a. The Department determines that the information provided by the Applicant in support of the Notification/Agreement is incomplete or inaccurate;
- b. The Department obtains new information that was not known to it in preparing the terms and conditions of the Agreement;
- c. The project or project activities as described in the Notification/Agreement have changed;
- d. The conditions affecting fish and wildlife resources change or the Department determines that project activities will result in a substantial adverse effect on the environment.

Concurrence (1600-2005-0122-R6)

In WITNESS WHEREOF, the parties below have executed this Lake or Streambed Alteration Agreement Number 1600-2005-0122-R6 as indicated below:

12-JULY-2005 
Date _____
Mr. Mark Heckman, Operator
California Department of
Transportation

12 July 2005 
Date _____
Prepared by:
Dawne Becker
Associate Biologist
Department of Fish and Game

14 July 2005 
Date _____
Michael E. Haynie,
Deputy Regional Manager
Department Of Fish and Game
Eastern Sierra-Inland Deserts Region

SUMMARY OPTIONAL IMPORTED BORROW MATERIAL SITE

The Keller Borrow Pit is available as an optional site for imported borrow. Removal shall be done in accordance with the attached environmental requirements and reclamation plan.

Existing Stockpiles that meet the requirement for imported borrow may be used to the extent they are available at the time of construction. Additional material may be developed in the pit in accordance with the mining requirements in the reclamation plan and as directed by the Engineer.

The existing access road shall be used to access the pit. The road shall be left open after the contractor finishes his operations. Any damage done to the road by the contractor shall be repaired.

The contractor is not required to do any reclamation of the pit, except existing slopes that the contractor disturbed shall be leveled to a smooth uniform slope.



Planning Department
168 North Edwards Street
Post Office Drawer L
Independence, California 93526

Phone: (760) 878-0263
(760) 872-2706
FAX: (760) 872-2712
E-Mail: InyoPlanning@telis.org

NOTICE OF DECISION

Luis Elias
CalTrans
500 South Main St.
Bishop, CA 93514

RE: Reclamation Plan #96-12/ Keeler Borrow Pit/MS #300

Dear Mr. Elias:

On July 23, 1997, the Inyo Planning Commission held a public hearing to consider your Reclamation Plan 96-12/Keeler, located in Section 15, Township 17S, Range 38E, (M.D.B.&M.), 2 miles south of the community of Keeler, East of Highway 136. The project is a request to reclaim the Keeler Borrow Pit at the Conclusion of mining.

The Planning Commission approved your project based on the following findings:

- A. Based upon the Initial Study and all written and verbal comments received, adopt the Mitigated Negative Declaration of Environmental Impact and certify the requirements of the California Environmental Quality Act have been satisfied.

[Evidence: In accordance with the requirements of the California Environmental Quality Act, an Initial Study and Draft Mitigated Negative Declaration of Environmental Impact were prepared and circulated for public comment.]

- B. Find the proposed reclamation plan conforms and meets the requirements of Chapter 7.70 (Mining & Reclamation) of Inyo County Code and State Mining Reclamation Act of 1976.
- C. The site has been subject to previous surface mining activity, and any surface disturbance as a result of future reclamation measures will not result in a significant loss of native vegetation or wildlife habitat. Any degradation to vegetation and wildlife habitat as a result of project approval, as conditioned, would be less than significant, and therefore, *de minimus*.

(Evidence: Based upon past surface disturbance and the photographs entered into record, any degradation to existing vegetation and wildlife habitat from proposed reclamation measures would be less than significant and therefore de minimus, as stated in Fish and Game Code 711.4)

- D. Approve Reclamation Plan No.96-12/Keeler Borrow Pit, MS #300

CONDITIONS OF APPROVAL:

Term of Plan and Timing of Reclamation

1. The term of the reclamation plan shall not exceed thirty years from the date of approval, or no later than August 31, 2027. Total amount of usable aggregate and waste material that can be removed from this pit is 120,00 cubic yards. If 120,000 cubic yards are removed prior to the termination date, reclamation shall proceed within six months of the removal of the 120,000 cubic yards. The Planning Commission may grant an extension. The applicant must submit a complete reclamation plan application for an amended reclamation plan. To assure continued operation, the above application should be received prior to the expiration date.

Interim Management Plan

2. Through out the 30-year life of this project, the interim management plan shall be implemented during periods of "idle" operation. If zero production occurs for a period of five consecutive years, the reclamation plan shall be implemented immediately. Mining can not occur until an amended reclamation plan is submitted and approved by the Inyo County Planning Commission.

Mapping

3. Caltrans shall provide the County with a contour map with two-foot contours within three years of approval of this reclamation plan.

Salvage of Growth Media (Topsoil)

4. The top six inches (6") of growth media (topsoil), shall be collected from areas to be disturbed (Borrow pits and internal access roads). This (topsoil) shall be stockpiled in the active work site until final phase reclamation.
5. After the site is recontoured, the salvaged topsoil shall be respread to a depth of six inches over the recontoured pit. (See condition #4)

Equipment and Trash Removal

6. At the conclusion of each phase of mining and reclamation, all equipment and trash shall be removed from the area. No asphalt may be buried onsite.

Erosion Control

7. Pit slopes shall be contoured to a minimum of 1:3 (Vertical: Horizontal). These slopes shall be established during times of intermittent operation, times the interim management plan is in affect, and during final reclamation.
8. Drainage structures are to be built as depicted on the plot map

Earthwork

8. All compacted areas shall be scarified. Road berms shall be brought back into the roadway after scarification.

Noxious Weed Control

9. During mining and reclamation activities and during idle periods noxious weeds shall be controlled on site.

Seed Sources and Mixtures

10. Seed used for revegetation shall be collected on or near the site. If sufficient seed is not available, it may be purchased. A seed mix of plant species native to the site shall be used:

Scientific Name	Common Name	PLS Pounds/acre
<i>Kochia californica</i>	Red molly	7
<i>Atriplex hymenelytra</i>	Desert holly	1
<i>Atriplex confertifolia</i>	Shadscale	2
<i>Atriplex canescens</i>	Fourwing saltbush	3
<i>Grayia spinosa</i>	Hop-sage	3
Total pounds live seed per acre		16

These native species should be obtained from seed stock found within five miles of the borrow site and within the Desert Saltbush Scrub plant community. If purchased, the seed shall be certified originating in the Owens Valley. Reseeding shall take place during the fall.

Mulching

11. A mulch of native vegetative material and straw shall be applied at a rate of 1000 lbs. per acre into the seeding program. This mulch shall be crimped into the slope to provide both wind and water erosion control and seed holding. This will enhance revegetation.

Revegetation Methods

12. After scarification, the approved seed mix shall be broadcast and then mixed into the top one-half inch (1/2") of the substrate by either raking or dragging a chain across the seedbed. This shall be done perpendicular to the slope of the pit.

Revegetation Performance Standard

13. Reclamation will not be considered successful or complete until vegetative density reaches 50 percent (number of plants per unit area) of the surrounding undisturbed land with a 70 percent diversity (species richness) of the perennial species on surrounding undisturbed land. New perennial species shall be at least two years old before considered viable plants. Cover shall be 50 percent of the surrounding undisturbed ground. This shall be verified based upon visual calculations and substantiated by past photographs of the site including off site photographs of the surrounding undisturbed lands.

Monitoring

14. From initial seeding, the project shall be monitored until performance standards are met. Remedial measures may be implemented any time to insure revegetation success. For the first two years, monitoring shall be performed twice a year.

Remedial Measures

15. If it appears the site will not meet the performance standard, the applicant shall consult with the Planning Department for recommendations on remedial measures. The remedial measures listed below shall be considered if reclamation problems are observed during annual monitoring:
- a. Mulching and/or fertilizing to supplement growth media;
 - b. Reseeding:

- c. Irrigation;
- d. Planting of appropriate containerized plants and protection of these plants.
- d. If irrigation is used the plants must make it on their own for two years.
- e. Analysis of soil for problems;
- f. Measures to reduce pest problems, including fencing individual plants.

Reporting and Annual Inspections

- 16. Each year the applicant shall file an annual mining report with the State. These reports shall be filed until financial assurances are released. Monitoring activities will continue until the County is satisfied that performance standards have been met. In accordance with SMARA Section 2774 (b), Inyo County as the Lead Agency shall inspect the site and file annual inspection reports with the State.

Inyo County Road Department

- 17. Caltrans shall allow Inyo County Road Department to remove material from this site. Caltrans shall be responsible for all reclamation requirements, including bonding and reporting. When Inyo County Road Department uses this pit, they shall adhere to the conditions of approval for this reclamation plan. Inyo County shall report the quantity of material to Caltrans each calendar quarter.

Reclamation Responsibility Statement

- 18. The applicant shall submit a notarized statement to the Inyo County Planning Department accepting responsibility for reclaiming lands as per the conditions specific herein.

Financial Assurances

- 19. Financial assurances in the sum of \$13,788.54 are required in the form of a surety bond, irrevocable letter of credit, cash or certificate of deposit. Government agencies may also use budget set asides, or pledge of revenue to post their financial assurances. Financial assurances shall be posted with the Inyo County Planning Department. Said assurances shall be made payable to the County of Inyo and the Director of the California Department of Conservation and The Bureau of Land Management.

Financial Assurance Recalculation

- 20. Financial assurances shall be recalculated each year in accordance with Section 2773.1(a)(3) of SMARA and Inyo County Code. This shall occur at the time of annual inspection.

Release of Financial Assurances

- 21. As required reclamation standards are achieved, that portion of financial assurances covering the completed activity may be released. The remainder of financial assurances covering revegetation and monitoring shall not be released until the revegetation performance standards is met.

Hold Harmless

- 22. The applicant, landowner, and operator shall defend, indemnify and hold harmless Inyo County, its agents, officers and employees from any claim, action, or proceeding against the County, its agents, officers and employees to attack, set aside, void, or annul any approval of the County, its advisory agencies, appeal boards, or its legislative body concerning Reclamation Plan No. 96-12/ Keeler Borrow Pit, MS 300.

Sincerely,

Earl H. Gann

Earl H. Gann
Mine Reclamation Planner

Notice of Determination

To: Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento, CA 95814

From: (Public Agency) INYO COUNTY PLANNING
168 N EDWARDS

X County Clerk
County of INYO COUNTY

(Address)
INDEPENDENCE 93526

FILED

JUL 24 1997



BEVERLY J. HARRY
INYO COUNTY CLERK
M. HARRY DEPUTY

Subject:

Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.

Project Title RECLAMATION PLAN 96-12 / KEELER BORROW SITE M/S 300 / CALTRANS

State Clearinghouse Number 97062037 Lead Agency EARL GANN Area Code/Telephone/Extension 760 878-0263
(If submitted to Clearinghouse) Contact Person

Project Location (include county) SECTION 15 T17S, R38E, N106M 2 MILES SOUTH OF KEELER, ON HIGHWAY 136, INYO COUNTY

Project Description: RECLAMATION PLAN TO RECLAIM THE BORROW PIT AT THE CONCLUSION OF MINING

This is to advise that the INYO COUNTY PLANNING COMMISSION has approved the above described project on

Lead Agency Responsible Agency

JULY 23, 1997 and has made the following determinations regarding the above described project:
(Date)

1. The project (will will not) have a significant effect on the environment.
2. An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
 A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures (were were not) made a condition of the approval of the project.
4. A statement of Overriding Considerations (was was not) adopted for this project.
5. Findings (were were not) made pursuant to the provisions of CEQA.

This is to certify that the final ^{NEG DEC} ~~EIR~~ with comments and responses and record of project approval is available to the General Public at:

INYO COUNTY PLANNING DEPT. 168 N. EDWARDS, INDEPENDENCE, CA

Earl Gann
Signature (Public Agency)

7/24/97 MINE RECLAMATION PLANNER
Date Title

Date received for filing at OPR:



Planning Department
168 North Edwards Street
Post Office Drawer L
Independence, California 93526

Phone: (619) 878-0263
(619) 872-2706
FAX: (619) 872-2712
E-Mail: InyoPlanning@telis.org

**DRAFT MITIGATED NEGATIVE DECLARATION OF ENVIRONMENTAL
IMPACT**

**PROJECT TITLE: Reclamation Plan # 96-12/ Keeler – MS #300 - California State
Department of Transportation (CalTrans)**

PROJECT LOCATION:

The project is located on Bureau of Land Management (BLM) lands approximately 2.0 miles south of the community of Keeler (more specifically referenced as being on the north side of Highway 136 at post mile 15.5). The project is located in the east ½ of Section 15, Township 17 South, Range 38 East, MDB&M.

PROJECT DESCRIPTION:

This is a mining project that will occupy approximately 4.8 acres of a 100 acre lease on BLM lands. The site is a triangular piece of property that is 3,800 feet north to south, by 2,300 feet east to west with the southwestern diagonal boundary along Highway 136. The termination date for this reclamation plan shall be the year 2032 A. D. The site will be mined for material to be used for road repair and maintenance. It is estimated that the maximum annual extraction volume will be about 40,000 cubic yards.

FINDINGS:

An Initial Study and an Evaluation of Potential Impacts has been prepared by the Planning Department (attached). The Initial Study, including an environmental checklist, indicated that the proposed project, as mitigated, will not have a significant adverse impact on the environment for the following reasons:

- A. The proposed project is consistent with the goals and objectives of the Inyo County General Plan. Therefore, the project is consistent with the adopted General Plan Land Use designation of "Open Space - Natural Resources."
- B. The proposed reclamation plan is consistent with the requirements of the Inyo County Zoning Ordinance and the OS-40 (Open space-40 acre minimum) zone.
- C. The proposed Reclamation Plan is consistent with the requirements of Chapter 7.70 of the Inyo County Code.
- D. Existing public and private services are adequate to meet the requirements of the proposed project without the need for their expansion.

E. The subject property is already disturbed and the surface disturbance that may be caused by the establishment of the project will not result in the major loss of native vegetation and wildlife habitat. The area has disturbed soils from previous mining and it has been determined that surface disturbance that may be caused by the proposed project would not result in the loss of native vegetation and wildlife habitat. Any degradation to existing wildlife habitat would be less than significant and therefore "*de minimus*". The reclamation plan shall mitigate the disturbance by implementation of reclamation conditions.

F. Based upon the information submitted, and the mitigation measures which will be required as a result of the Initial Study, it has been found that the project does not have the potential to create a significant adverse impact on the following:

1. Earth
2. Flora and Fauna
3. Air Quality

This constitutes a Negative Finding for the Mandatory Findings required pursuant to Section 15065 of the California Environmental Quality Act (CEQA) Guidelines. Mitigation measures that will be required are as follows:

1. EARTH:

PROBLEM:

Although the area is not in an identified FEMA flood zone, short-term high-intensity precipitation events have been known to occur in this area. These storms have the potential to deposit borrow debris onto Highway 136

MITIGATION MEASURE:

CalTrans shall construct berms to divert storm flows around and away from the borrow pit.

MITIGATION LEVEL:

Mitigate to a less than significant level.

LEAD AGENCY:

Inyo County Planning Commission

FUNDING SOURCE:

Mining Operator/Applicant (CalTrans) shall directly implement this measure at their expense.

IMPLEMENTING AGENCY:

Mining Operator/Applicant (CalTrans).

TIMING:

Mitigation measure is to be implemented prior to mining.

MONITORING AGENCY:
Inyo County Planning Department.

2. Flora and Fauna

PROBLEM:
Mining will disturb wildlife and plant habitat.

MITIGATION MEASURE:
CalTrans shall implement a revegetation program as part of a mine reclamation plan at the conclusion of mining.

MITIGATION LEVEL:
Mitigate to a less than significant level.

LEAD AGENCY:
Inyo County Planning Commission

FUNDING SOURCE:
Mining Operator/Applicant (CalTrans) shall directly implement this measure at their expense.

IMPLEMENTING AGENCY:
Mining Operator/Applicant (CalTrans).

TIMING:
Mitigation measures are to be implemented at the conclusion of mining.

MONITORING AGENCY:
Inyo County Planning Department.

3. Air Quality

PROBLEM:
Mining and reclamation will has the potential to create dust problems.

MITIGATION MEASURE:
During mining, processing and reclamation activities the operator shall have a water truck on hand to suppress the dust that is created during the above activities.

MITIGATION LEVEL:
Mitigate to a less than significant level.

LEAD AGENCY:

Inyo County Planning Commission

FUNDING SOURCE:

Mining Operator/Applicant (CalTrans) shall directly implement this measure at their expense.

IMPLEMENTING AGENCY:

Mining Operator/Applicant (CalTrans).

TIMING:

Mitigation measure is to be implemented during mining, processing and reclamation activities.

MONITORING AGENCY:

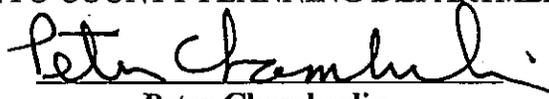
Inyo County Planning Department.

The review period for this Negative Declaration expires on **July 8, 1997**. Inyo County is not required to respond to any comments received after this date.

Additional information is available from the Inyo County Planning Department. Please contact Project Planner, Earl H. Gann, if you have any questions regarding this project.

INYO COUNTY PLANNING DEPARTMENT

6/5/97
Date


Peter Chamberlin
Planning Director

Attachments: Initial Study,
Evaluation of Potential Impacts
Vicinity Maps (from Rec. Plan)

Date	Reviewer	Initials
6/5/97	Project Planner	EAG
6/5/97	Review Planner	CS
	Planning Director	
	Secretary	



Planning Department
168 North Edwards Street
Post Office Drawer L
Independence, California 93526

Phone: (619) 878-0263
(619) 872-2706
FAX: (619) 872-2712
E-Mail: InyoPlanning@telis.org

INITIAL STUDY CHECKLIST

I. BACKGROUND

1. Project Title: Reclamation Plan # 96-12/ Keeler – MS #300 - California State Department of Transportation (CalTrans)
2. Name of Project Applicant: California State Department of Transportation (CalTrans)
3. Address and Phone Number of Applicant: 500 South Main Street
Bishop, CA 93514
(760) 872-0734
4. Lead Agency Contact Persons: Earl H. Gann & Curtis E. Kellogg.
5. Lead Agency Address and Phone Number: Inyo County Planning Department
P. O. Drawer "L"
Independence, CA 93526
(760) 878-02363
6. Date Checklist Completed: June 4, 1997.
7. Parties Completing Checklist: Earl H. Gann, Mine Reclamation Planner.
Curtis E. Kellogg, Associate Planner.
8. Project Location: The project is located on Bureau of Land Management (BLM) lands approximately 2.0 miles south of the community of Keeler (more specifically referenced as being on the north side of Highway 136 at post mile 15.5). The project is located in the east ½ of Section 15, Township 17 South, Range 38 East, MDB&M.
9. General Plan Designation: Open Space / Natural Resources .
10. Zoning Classification: OS-40 (Open Space - Forty acres minimum).
11. Description of Project (*Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary*):

This is a mining project that will occupy approximately 4.8 acres on a 100 acre lease on BLM lands. The site is a triangular piece of property that is 3,800 feet north to south, by 2,300 feet east to west with the southwestern diagonal boundary along Highway 136. The termination date for this reclamation plan shall be the year 2032 A. D. The site will be mined for material to be used for road repair and maintenance. It is estimated that the maximum annual extraction volume will be about 40,000 cubic yards.
12. Surrounding Land Uses and Setting (*Briefly describe the project's surroundings*):

The surrounding land use is Open Space (across State Highway 190 to the north are lands designated as "Wilderness" by the BLM).
13. Other Agencies Whose Approval Is Required (*e.g., permits, financing approval, or participation agreement*):
Bureau of Land Management

II. EVALUATION OF ENVIRONMENTAL IMPACTS

1. *A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).*
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. "Potentially Significant Impact" is appropriate if there is *substantial evidence* that an effect is significant.
4. Mitigation Identified: *Negative Declaration* applies where the incorporation of mitigation measures has reduced an effect from potentially significant to less than significant. The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less-than-significant level.
5. No Mitigation Identified: *EIR* applies where there is substantial evidence that an effect is significant and no mitigation is identified or more analysis is needed. When this determination is made, an EIR is required.
6. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. State CEQA Guidelines Section 15063(c)(3)(D).
7. References to information sources for potential impacts (e.g., general plans, zoning ordinances) should be provided. *Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.*

III. ENVIRONMENTAL ANALYSIS

Include explanations for all answers by adding text to form or on attached pages.

	No Impact	Less-than-Significant Impact	Potentially Significant Impact	
			Mitigation Identified - Negative Declaration	No Mitigation Identified - EIR
1. Land Use and Planning				
a. Does the project conflict with adopted land use plans or policies that are applicable to the project site or to the project vicinity? [Note that on a project-specific basis, such applicable land use plans and policies may include those imposed by local agencies, by local or regional agencies, and by statewide land use agencies.] <i>This project will not conflict with any adopted land use plans or policies.</i>	X	_____	_____	_____
b. Would the project conflict with open space, low-income housing, or other adopted land use goals that are applicable to the project location? <i>This project will not conflict with any open space, low-income housing or land use goals because the project is located in a remote area.</i>	X	_____	_____	_____
c. Would the project conflict with established recreational, educational, religious, or scientific uses at the project location? <i>This project will not conflict with the above uses.</i>	X	_____	_____	_____
d. Would the project require cancellation of Williamson Act agricultural contracts, or convert agricultural land to a non-agricultural use within an area designated as Important Farmland by the Department of Conservation, or an area designated as Prime Farmland by the Soil Conservation Service of the federal Department of Agriculture? <i>This project is not in any farming area and will not convert any agricultural land to non-agricultural uses.</i>	X	_____	_____	_____
e. Would the project cause a nuisance to existing or planned land uses? Would existing or planned land uses cause a nuisance to the residents or users of the project? <i>This project is consistent with existing land use policies of the County in regards to mining.</i>	X	_____	_____	_____
2. Population, Employment, and Housing				
a. Does the project conflict with population, employment, or housing policies or projections established by government agencies with jurisdiction over the project? <i>This project is located in a remote area of the County and will not affect any population, employment and housing policies or projections.</i>	X	_____	_____	_____

	No Impact	Less-than-Significant Impact	Potentially Significant Impact	
			Mitigation Identified - Negative Declaration	No Mitigation Identified - EIR
b. Will the project directly or indirectly cause substantial growth or concentration in the population beyond current levels? <i>Due to the small size of the project no substantial growth or population concentration will occur.</i>	X	_____	_____	_____
c. Will the project directly or indirectly cause a net loss in the number of jobs in the community or cause substantial job or income losses by changing the employment opportunities in a community? <i>Because of the nature of this project no net loss of jobs will occur.</i>	X	_____	_____	_____
d. Does the project displace existing residences or otherwise create or exacerbate a housing shortage? <i>No residential units are located in the area of this project. This project will not create a housing shortage.</i>	X	_____	_____	_____
3. Geology, Soils, and Seismicity				
a. Would the project conflict with applicable legal requirements regarding geohazards and soil conservation? <i>This project will not conflict with any legal requirements regarding geohazards and soil conservation.</i>	X	_____	_____	_____
b. Is the project likely to expose people or structures to significant geohazards? In particular, is the project located within an Alquist-Priolo Special Studies Zone, within a known active fault zone, in an area characterized by surface rupture that might be related to a fault, or in an area designated as geologic hazard area or subject to geohazard safety measures in a local plan or ordinance? <i>The project is not located in an earthquake Special Study Zone as identified in the Alquist-Priolo Special Studies Maps (no map printed).</i>	X	_____	_____	_____
c. Does the substrate at the project site consist of material that is subject to liquefaction or other secondary seismic hazards in the event of groundshaking? <i>The substrate is not subject to liquefaction or secondary hazards.</i>	X	_____	_____	_____
d. Is there any evidence of static hazards, such as landsliding or slopes in excess of 15%, that could result in slope failure? <i>Although the area has slopes greater than 15%, it is not subject to landsliding (less than significant).</i>	_____	X	_____	_____
e. Is the project located on or in the vicinity of soil that is likely to collapse or subside, as might be the case with fill, old mining properties, or areas of subsidence caused by groundwater drawdown? <i>Due to the nature of the project, no groundwater drawdown will occur.</i>	X	_____	_____	_____

	No Impact	Less-than-Significant Impact	Potentially Significant Impact	
			Mitigation Identified - Negative Declaration	No Mitigation Identified - EIR
f. Are soils characterized by shrink/swell potential that might result in deformation of foundations or damage to structures? <i>Soils in the project area are not characterized by shrink/swell potential.</i>	X	_____	_____	_____
g. Would the project result in substantial soil erosion or loss of topsoil? <i>Because of the nature of this project soil erosion may occur. However, the design of the project will limit this to a less than significant impact.</i>	_____	X	_____	_____
h. Would the project result in loss of (or lost access to) mineral resources, including rock/sand/gravel resources, or other known resources such as those identified in a Mineral Resource Zone identified by the California Department of Mines and Geology? <i>The project will not result in the loss of a valuable mineral resource.</i>	X	_____	_____	_____
i. Would the project result in loss of a unique geographical feature of statewide or national significance? <i>The project site does not have any unique geologic features.</i>	X	_____	_____	_____
4. Hydrology and Water Quality				
a. Would the project conflict with applicable legal requirements relating to hydrology and water quality? <i>This project will not conflict with any legal requirements relating with hydrology or water quality.</i>	X	_____	_____	_____
b. Would the project cause direct or indirect wastewater discharges that would result in acute or eventual exposures to levels of hazardous materials that would adversely affect human health, wildlife, or plant species? Would the project otherwise substantially degrade surface water quality? <i>This project will not cause direct or indirect wastewater discharges of hazardous materials to surface water.</i>	X	_____	_____	_____
c. Would the project substantially degrade groundwater quality, interfere substantially with groundwater recharge, or deplete groundwater resources in a manner that would cause water-related hazards such as subsidence? <i>This project will not degrade groundwater. Groundwater in the area is not potable, and therefore, undrinkable.</i>	X	_____	_____	_____
d. Would the project alter the existing drainage pattern of the site or area in a manner that results in flooding, erosion, or siltation, on- or off-site? <i>Drainage may be affected. However, this will not be a significant</i>	_____	X	_____	_____

	No Impact	Less-than-Significant Impact	Potentially Significant Impact	
			Mitigation Identified - Negative Declaration	No Mitigation Identified - EIR

impact.

- e. Is the project located in a flood-prone area, based on either historical flood records or potential risks relating to existing or planned changes to flood control measures?

Although the project location is not listed as a flood prone area short-term high-intensity precipitation events have been known to occur in this area. There is a FEMA flood map printed for the area (060073 1275 B).

During short term high intensity precipitation events Caltrans shall construct diversion berms to prevent flooding of the pit. These berms will not eliminate flooding of Highway 136 during these high intensity events. These berms will prevent debris from the pit crossing the road to a less than significant level.

This pit will not have a cumulative affect on the flooding of highway 136 during these high intensity events.

5. Biological Resources

- a. Would the project violate any environmental law or regulation designed to protect wildlife, fisheries, plant species, or habitat areas?

The project is an existing borrow site that has 4.8 acres of disturbed wildlife habitat. However, the reclamation plan shall mitigate the disturbance by implementation of reclamation conditions..

- b. Would the project directly harm a sensitive species or cause a net loss to the habitat of the species?

Reclamation will restore existing damage to the site..

- c. Would the project interfere substantially with the movement of any resident or migratory fish or wildlife species, or with established resident or migratory corridors?

This project will not interfere substantially with the movement of any resident or migratory wildlife species.

- d. Would the project cause any fish or wildlife population to drop below self-sustaining levels?

The size of this project will not cause any fish or wildlife population to drop below self-sustaining levels.

- e. Would the project cause a net loss of any riparian lands, wetlands, marshes, or other environmentally sensitive habitat areas?

No wetlands are in the area of this project.

	No Impact	Less-than-Significant Impact	Potentially Significant Impact	
			Mitigation Identified - Negative Declaration	No Mitigation Identified - EIR
f. Would the project result in the loss of any "specimen tree" or tree with historic value? <i>No trees are in the project area.</i> <i>Wildlife protection measures for CalTrans shall be those measures outlined in their reclamation plan.</i>	X	_____	_____	_____
6. Cultural and Historical Resources				
a. Would the project conflict with the cultural and historic protection measures established by federal, state, or local regulatory programs? <i>No Federal State or local cultural or historical protection regulatory programs have been established for this area.</i>	X	_____	_____	_____
b. Would the project cause the physical disturbance of, or prevent future access to, a prehistoric, historic, or cultural site that is listed or eligible for listing on the National Register of Historic Places, the California Register of Historic Resources, or a Register of Historic Resources that has been adopted by resolution or ordinance of a local government? <i>Mining has occurred on this site. This precludes the finding of any prehistoric cultural resources at this site. The previous mining is considered historical and culturally less than significant.</i>	_____	X	_____	_____
c. Would the project cause the physical disturbance of, or prevent future access to, a structure, parcel, or other feature of historic or cultural significance to a community, ethnic, or social group? <i>This mining project and the proposed reclamation project shall not prevent future access any known historic or cultural sites.</i>	X	_____	_____	_____
d. Would the project cause the physical disturbance of, or prevent future access to, a unique paleontological site? <i>No known paleontological sites have been located in the project area. If any were found this project would not prevent access to such a site.</i>	X	_____	_____	_____
e. Would the project cause the disturbance of any human remains? <i>No human remains have been found in the project area.</i>	X	_____	_____	_____
7. Traffic and Transportation				
a. Would the project cause a new violation, or exacerbate an existing violation, of an applicable legal standard or goal relating to traffic levels of service (LOS) or volume/capacity (V/C) ratios, of a state or local agency? (LOS ratings range from "A" to "F", with many California agencies ranking "E" and "F" as unacceptable. V/C ratios range from 0 to 1.0, with many California agencies ranking an incremental worsening of 0.02 as unacceptable for intersections	X	_____	_____	_____

	No Impact	Less-than-Significant Impact	Potentially Significant Impact	
			Mitigation Identified - Negative Declaration	No Mitigation Identified - EIR
<p>already operating at LOS E or F. These significance thresholds should be used to evaluate average and peak-hour project traffic impacts if the local agency has not adopted any particular significance standards for the project area.)</p> <p><i>Due to the remote location of this project site, no legal standard relating to traffic levels will be violated.</i></p>				
<p>b. Does the project conflict with an applicable Congestion Management Plan, air quality plan, or other plan or policy relating to automobiles or transit systems, adopted by a federal, state, or local agency?</p> <p><i>No congestion management plan is in effect for this area of the County.</i></p>	X	_____	_____	_____
<p>c. Would the project add traffic to a roadway that has design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, inadequate pavement structure) or supports uses that would be incompatible with substantial increases in traffic (e.g., rural roads used by farm equipment, livestock, horseback riders, or pedestrians) that would result in safety problems with the addition of project-related traffic?</p> <p><i>The nature of this project will not add significant traffic to any road within the area.</i></p>	_____	X	_____	_____
<p>d. Does the project have adequate internal circulation capacity, including entrance and exit routes, to safely accommodate average and peak-hour traffic loads?</p> <p><i>The remote location and the nature of this project will adequately accommodate the traffic loads created by this project. The internal circulation is adequate for this project.</i></p>	X	_____	_____	_____
<p>e. Does the project provide for safe pedestrian and bicycle circulation?</p> <p><i>Pedestrian traffic will not be a problem in this area due to the remote location of the project site.</i></p>	X	_____	_____	_____
<p>f. Does the project provide sufficient parking capacity for the projected numbers of automobiles and bicycles? If not, is there sufficient commercial parking capacity available in the immediate project vicinity? If not, will unmet project parking demand worsen parking availability for existing residents or commercial enterprises?</p> <p><i>The small size and nature of this project precludes any parking problems associated in the area of this project.</i></p>	X	_____	_____	_____
<p>g. Is the project currently served by the community transit program? Is there sufficient capacity on the existing transit system for the project? If not, is there an adopted and funded plan to increase</p>	X	_____	_____	_____

	No Impact	Less-than-Significant Impact	Potentially Significant Impact	
			Mitigation Identified - Negative Declaration	No Mitigation Identified - EIR

transit capacity to meet project demand?

This project is not served by any community transit program. This project will not create any need to establish a community transit program for this area.

8. Visual Quality and Aesthetics

- a. Would the project conflict with the applicable vista protection standards, scenic resource protection requirements, and design criteria of federal, state, and local agencies? _____ X _____ _____

The borrow pit operation will be visible from Highway 136. The visual qualities and vistas protection standards of the area will not be affected by this project. Reclamation will restore the project site close to its original configuration.

- b. Does the project alter or obstruct existing public viewsheds from or across the project site, including scenic features associated with designated scenic highways? _____ X _____ _____

The project, as submitted, will alter existing public viewsheds. However, reclamation of the site will restore the landscape.

- c. Does the project change the existing visual quality and character at the project site in a manner that is inconsistent with other uses that currently exist or have been approved for the area? Are such changes attributable to project size, massing, density, landscaping, regrading, or other changes to the physical environment? X _____ _____ _____

Mining will create a visible depression. Reclamation will blend the depression with the surrounding undisturbed area. Revegetation will strive to restore the project site as close to its original configuration as possible.

- d. Does the project increase light and glare in the project vicinity so as to cause a hazard or nuisance condition? X _____ _____ _____

The nature of this project will not alter light or glare in the project vicinity.

- e. Does the project significantly reduce sunlight or introduce shadows in public areas? Would loss of sunlight or increase in shadows adversely affect sensitive species or habitats? X _____ _____ _____

The nature of this project will not alter or reduce the sunlight or introduce any shadows in the area.

9. Air Quality

- a. Would the project violate any law or regulation designed to achieve or maintain compliance with ambient air quality standards or protect against adverse health effects caused by air pollution? _____ _____ X _____

The County is a non-compliance area for PM10 emissions. Mining and reclamation activities has the potential to create dust

	No Impact	Less-than-Significant Impact	Potentially Significant Impact	
			Mitigation Identified - Negative Declaration	No Mitigation Identified - EIR

in the initial operations start-up and operation. A water truck will be present to keep the dust down while operations are being conducted.

- | | | | | |
|--|-------|---|-------|-------|
| b. Would the project violate any approved plan or policy regarding air pollution, including federal or state air quality management plans for achieving or maintaining compliance with applicable ambient air quality standards, local or regional growth or congestion management plans, and local or regional CEQA significance standards for air quality? | _____ | X | _____ | _____ |
|--|-------|---|-------|-------|

See 9a.

- | | | | | |
|--|-------|---|-------|-------|
| c. Would the project result in a net increase of any criteria pollutant for which the project area has not attained applicable federal or state ambient air quality standards? Would such a net increase exceed any of the specific parameters listed below? | _____ | X | _____ | _____ |
|--|-------|---|-------|-------|

See 9a.

- | | | | | |
|--|---|-------|-------|-------|
| d. Using the approved or established risk assessment methodologies of the air quality control agencies, would project toxic air contaminant (TAC) emissions cause a significant short- or long-term health risk? Would project TAC emissions cause an increased cancer risk of greater than ten per million? | X | _____ | _____ | _____ |
|--|---|-------|-------|-------|

The project will not cause any toxic air contaminant to be released into the air.

- | | | | | |
|--|---|-------|-------|-------|
| e. Would the project require the removal or demolition of building components containing asbestos, or the excavation or crushing of serpentine rock containing asbestos? | X | _____ | _____ | _____ |
|--|---|-------|-------|-------|

The material being mine at this site does not contain asbestos. No structures are on site and none are planned.

- | | | | | |
|--|---|-------|-------|-------|
| f. Would the project require the removal or movement of soils contaminated by hazardous materials that can cause adverse health impacts if airborne? | X | _____ | _____ | _____ |
|--|---|-------|-------|-------|

Soils to be moved in the road construction and the reclamation of said roads are not contaminated with hazardous materials. The soils do not contain any hazardous materials.

- | | | | | |
|--|---|-------|-------|-------|
| g. Would the project concentrate vehicle trips or vehicle-related emissions in a localized area (e.g., intersections, parking areas), which would cause a violation of the carbon monoxide ambient air quality standard? | X | _____ | _____ | _____ |
|--|---|-------|-------|-------|

The small nature of this project will not violate any carbon monoxide ambient air standards.

- | | | | | |
|--|---|-------|-------|-------|
| h. Does the project have the potential to cause an odor, visibility, or other problem that would create a public nuisance condition? | X | _____ | _____ | _____ |
|--|---|-------|-------|-------|

	No Impact	Less-than-Significant Impact	Potentially Significant Impact	
			Mitigation Identified - Negative Declaration	No Mitigation Identified - EIR

Because of the remote location and the nature of this operation no odors produced will create a public nuisance condition.

10. Noise and Vibration

- a. Would the project violate any established noise or vibration law, regulation, or standard? X _____ _____ _____

The project will not violate any established noise or vibration law regulation or standard. All equipment shall conform with the required standards set by both California Office of Safety and Health Administration and Mine Safety and Health Administration.

- b. Would the project cause a permanent increase in ambient noise or vibration levels that would be perceptible to humans in the project vicinity, and that is perceptibly greater than the noise or vibration levels caused by existing development in the project area? X _____ _____ _____

No permanent increase in noise will be created by this project.

- c. Would the project cause a temporary or periodic increase in ambient noise or vibration levels that would be perceptible to humans in the project vicinity, and that is perceptibly greater than the noise or vibration levels caused by existing development and activity in the project area? _____ X _____ _____

Mining and reclamation activities will cause a temporary increase in ambient noise levels. Workers in the immediate vicinity shall be required to wear hearing protection.

- d. Can the project noise and vibration level during construction activities be limited to daylight, weekday hours and be comparable to that required for construction of existing development in the project area? _____ X _____ _____

Reclamation activities may be confined to daylight hours. Mining may occur 24 hours per day. Because of the remote location of this project 24 hour operations will create in significant noise.

11. Utilities and Infrastructure

- a. *Electricity:* Will the project require expansions in existing electrical generating facilities and existing high-power transmission lines? X _____ _____ _____

This project will not require any expansion of existing electrical generating facilities (portable diesel generator).

- b. *Water:* Will the project comply with water conservation and supply requirements imposed by state and local agencies? Will the project require expansions in existing water supply treatment facilities or trunk conveyance lines? Has the water purveyor determined that it has adequate treatment facilities, conveyance capacity, and water supplies to serve project demand? Will the water supply be drawn from a groundwater basin that is overdrawn X _____ _____ _____

	No Impact	Less-than-Significant Impact	Potentially Significant Impact	
			Mitigation Identified - Negative Declaration	No Mitigation Identified - EIR

in relation to demand and historical levels?

This project will comply with water conservation requirements. The project will not expand any water supply.

- | | | | | |
|---|---|-------|-------|-------|
| c. <i>Wastewater Treatment:</i> Will the project comply with wastewater pretreatment standards enforced by federal, state, and local regulatory agencies? Will the project require expansions of the wastewater treatment facilities and trunk conveyance lines? Has the wastewater treatment provider determined that it has adequate treatment and conveyance capacity to serve project demand? | X | _____ | _____ | _____ |
|---|---|-------|-------|-------|

This project will not create any wastewater and will not require expansion of any wastewater facility.

- | | | | | |
|--|---|-------|-------|-------|
| d. <i>Solid Waste:</i> Will the project comply with state and local requirements relating to recycling, litter control, and solid waste handling? Is a landfill available with sufficient capacity to accommodate on a long-term basis (10 or more years) solid waste generated by the proposed project? | X | _____ | _____ | _____ |
|--|---|-------|-------|-------|

This project will create insignificant amounts of solid waste. It will not impact any solid waste facility.

12. Public Services

- | | | | | |
|---|---|-------|-------|-------|
| a. <i>Sheriff:</i> Will the project require additional staff or equipment to maintain acceptable service ratios, response times, or other performance objectives? | X | _____ | _____ | _____ |
|---|---|-------|-------|-------|

The project will not require additional law enforcement personnel or equipment to service this project.

- | | | | | |
|--|---|-------|-------|-------|
| b. <i>Fire:</i> Will the project require additional staff or equipment to maintain an acceptable level of service (i.e., response time, equipment capacity)? | X | _____ | _____ | _____ |
|--|---|-------|-------|-------|

This project will not require additional staff to maintain adequate fire protection.

- | | | | | |
|---|---|-------|-------|-------|
| c. <i>Schools:</i> Will the project increase the population of school-age children in a K-12 school district that is or will be operating without adequate staff, equipment, or facilities? | X | _____ | _____ | _____ |
|---|---|-------|-------|-------|

Schools will not be affected by this project.

- | | | | | |
|--|---|-------|-------|-------|
| d. <i>Parks and Recreation:</i> Will the project increase use of existing park and recreational facilities, or require the creation of new park and recreational facilities, to comply with locally adopted park and recreational service standards? | X | _____ | _____ | _____ |
|--|---|-------|-------|-------|

This project will not increase the use of any park or recreational facilities.

13. Energy

		Potentially Significant Impact			
		No Impact	Less-than-Significant Impact	Mitigation Identified - Negative Declaration	No Mitigation Identified - EIR
a.	Does the project comply with applicable laws and regulations regarding energy conservation? <i>This project will comply with all energy conservation regulations.</i>	X	_____	_____	_____
b.	Does the project require quantities of nonrenewable sources of energy in excess of quantities required by recent, similar projects? <i>This project will not require inordinate amount of nonrenewable resources.</i>	X	_____	_____	_____
c.	Do the energy suppliers have the capacity to supply the project's energy needs with existing and planned energy sources and conveyance systems? <i>Energy suppliers will have no problems in supplying this project.</i>	X	_____	_____	_____
14. Hazardous Materials					
a.	Will the project comply with applicable federal, state, and local laws, regulations, and standards relating to hazardous materials? <i>This project will not use any hazardous material, other than the usual fuel to operate mobile equipment.</i>	X	_____	_____	_____
b.	Is the soil or groundwater at the project site contaminated by hazardous materials? Is such contamination known to exist at another location that is within 2,000 feet of the project site? <i>The soil and groundwater are not contaminated with hazardous material. No such contamination is known to be located within 2,000 feet of the project site.</i>	X	_____	_____	_____
c.	Does the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? <i>This project does not use hazardous materials in the operation of mining activities.</i>	X	_____	_____	_____
d.	Does the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials to the environment? <i>This operation does not use hazardous material.</i>	X	_____	_____	_____
e.	Will the project interfere with community emergency response plans or emergency evacuation plans in the event of a reasonably foreseeable emergency situation involving a hazardous material exposure or release? <i>This project is located outside the range of any emergency response plans.</i>	X	_____	_____	_____
f.	Are there hazardous material re-use, or one or more hazardous	X	_____	_____	_____

	No Impact	Less-than-Significant Impact	Potentially Significant Impact	
			Mitigation Identified - Negative Declaration	No Mitigation Identified - EIR

waste treatment or disposal, facilities available to lawfully accept and handle hazardous wastes generated by the project?

This site will not generate any hazardous waste.

15. Mandatory Findings of Significance

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	X	_____	_____	_____
b. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one that occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future.)	_____	_____	X	_____
c. Does the project have impacts that are individually limited, but cumulatively significant when placed in the context of other reasonably foreseeable projects?	_____	X	_____	_____
d. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	X	_____	_____	_____

IV. DETERMINATION BASED ON ENVIRONMENTAL EVALUATION

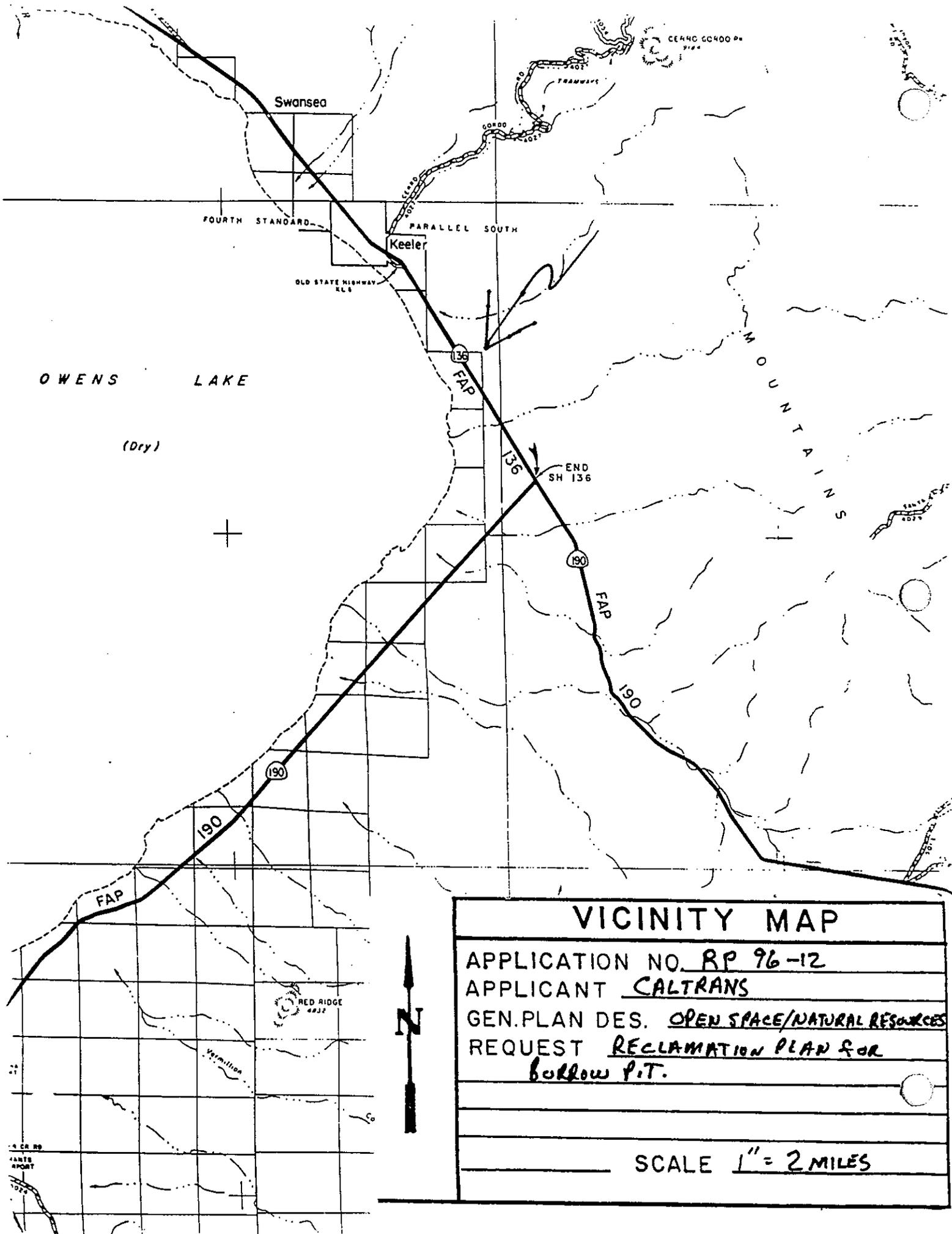
On the basis of this Initial Study evaluation:

- The proposed project is CATEGORICALLY EXEMPT from CEQA under Class(es) ____, and there are no unusual circumstances or specified statutory conditions present that render reliance on such applicable Categorical Exemption(s) unlawful.
- The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION should be prepared.
- Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described [above/in the attached list] will be a required condition of project approval, and accordingly a MITIGATED NEGATIVE DECLARATION should be prepared.
- There is substantial evidence that the proposed project may have a significant adverse impact on the environment, and an ENVIRONMENTAL IMPACT REPORT should be required.

Date: 6/5/97

Earl H. Samu
(Signature)

For _____



VICINITY MAP

APPLICATION NO. RP 96-12

APPLICANT CALTRANS

GEN. PLAN DES. OPEN SPACE/NATURAL RESOURCES

REQUEST RECLAMATION PLAN FOR
BORROW PIT.

SCALE 1" = 2 MILES



Planning Department
168 North Edwards Street
Post Office Drawer L
Independence, California 93526

Phone: (760) 878-0263
(760) 872-2706
FAX: (760) 872-2712
E-Mail: InyoPlanning@telis.org

STAFF REPORT

AGENDA ITEM NO: 8

DATE: July 23, 1997

SUBJECT: Reclamation Plan # 96-12/ Keeler Borrow Site/MS#300/
Caltrans

SUPERVISORIAL

DISTRICT:

Fifth.

APPLICATION:

Keeler Borrow Site # RP 96-12.

APPLICANT:

Caltrans District 9

500 South Main

Bishop, CA 93514

(760) 872-0784

LANDOWNER:

Department of Interior Bureau of Land Management.

LOCATION:

The project is located 2 miles south of the community of Keeler west of Highway 136 in Section 15, Township 17S, Range 38E, MDB&M.

A.P.N.:

31-010-19

ZONING:

OS-40 (Open Space - 40 acres minimum).

GENERAL PLAN:

"Open Space-Natural Resources".

SITE SIZE:

100 acres.

PROPOSAL:

The proposal is to reclaim disturbance caused by mining the borrow site at the conclusion of mining. Mine life is expected to be thirty years. This is a continuation and expansion of an existing borrow pit operation. The total disturbed acreage including expansion will not be over 4.8 acres.

PROJECT PLANNER:

Earl H. Gann, Mine Reclamation Planner.

PROJECT DESCRIPTION:

This project is an reclamation plan that will reclaim a borrow pit that occupies 4.8 acres on a 100 acre parcel. The total amount of material to be extracted over the next thirty years is 120,000

cubic yards. It is estimated that 50,000 cubic yards have been removed in the past. Material will be removed in a single phase. However, because of the nature of Caltrans operations this pit will be operated intermittently. At the conclusion of mining, reclamation will take place on the mined lands. Approval of the reclamation plan is a discretionary action by Inyo County under Section 7.70.02 of Inyo County Code and Section 2710 *et. seq.* of Public Resources Code.

SUBJECT PROPERTY AND SURROUNDING LAND USES:

Surrounding land uses are all open space and zoned as follows:

	<u>Land Owner</u>	<u>Land Use</u>	<u>Zoning</u>
<u>North:</u>	Bureau of Land Management	Open	OS-40
<u>South:</u>	Bureau of Land Management	Open	OS-40
<u>East:</u>	Bureau of Land Management	Open	OS-40
<u>West:</u>	Bureau of Land Management	Open	OS-40

STAFF ANALYSIS:

The County's comments and analysis of the submitted reclamation plan are located after the proposed reclamation plan.

Reclamation Plan (As submitted by the Applicant, written in different font)

The site will be used by CalTrans intermittently as a source of materials for road maintenance and construction. Reclamation of the site will be implemented according to the reclamation plan discussed below.

SUBSEQUENT USES

The land is zoned by Inyo County as open space, with no special land use restrictions. According to various resource maps, the site does not support any designated, critical wildlife habitat; however, the site does provide general habitat values to various wildlife species.. The site will be reclaimed to open space and wildlife habitat, which will leave the site in a productive end use that is readily adaptable to alternative end uses.

IMPACT TO FUTURE MINING

Reclamation of this site will not preclude mining at a future date. The aggregate resource likely extends beyond 100 feet deep; the current mining plan will not have exhausted on-site mineral resources.

RECLAMATION SCHEDULE

Reclamation treatments, such as material berms, will be installed during the initial site reclamation phase. Reclamation treatments such as resoiling and revegetation will be installed when final slope are present. Once reclamation treatments have implemented, those treatments will be monitored until performance standards have been met. The monitoring plan is designed to evaluate site-specific criteria for slope stability, erosion and sediment control, and resoiling and revegetation

POST-MINING ACTIVITIES and SITE CONFIGURATION

Map Sheet 4 depicts the post mining activities and reclaimed topography of the mined area. The final site configuration will, in general, be a rectangular-shaped excavated pit into the alluvial fan to the west of the wave cut terraces, no greater than 40 –feet deep, with side slopes no steeper than 3:1 (H:V). All asphaltic materials within the pit will be removed and disposed of in an appropriate off-site location. The entry to the access road will be blocked and the road will be reshaped, reclaimed, and revegetated to blend with the surrounding topography. Topsoil and vegetative debris (termed “duff”), and fines will be applied to this landform. A native seed mixture will be incorporated into the site.

Slope Stability

Pit slopes for the mining phase and the final reclaimed site will not be steeper than 3:1 (H:V), or 18°, except for the minor road cuts which will be 1.75:1(H:V), or 30°. For final 3:1 (H:V) pit slopes, a static factor of safety of 1.9 is calculated. Thus, pits will be stable at the proposed angle under static conditions. However, depending on the conditions of the sediment exposed on the slope (moisture content, vegetation cover, compaction, etc.), portions of the pit slope could experience surficial failure due to seismic loading from a maximum credible earthquake on one of the active faults in the area. Any slope failures will be retained within the pit.

Final Drainage Plan and Impoundment's

Map Sheet 4 details the final drainage plan of the reclaimed site. Each of sediment berms around the pit will remain in place and will be maintained throughout the life of the permit.

Disposition of Equipment

Any equipment brought onto the site will be removed from the site following termination of mining activity. No equipment will be stored permanently on-site. At final reclamation, there will be no equipment remaining on the mined site.

RESOILING

The native soil of this site is very sandy with a large amount of coarse fraction (gravel and larger) material on the surface. The topsoil also contains native seeds and soil microorganisms. While a portion of the topsoil (the large fraction) is part of the minerals being extracted from this site, the upper six inches will be treated as an invaluable resource and salvaged, rather than as a commodity and removed from the site.

The topsoil is therefore defined as the upper six inches of the native surface. Duff is defined as the topsoil and vegetative material. Prior to mining any area that has not been previously mined (the majority of the site), the top six inches of the native surface and all existing vegetative material will be scraped off the mining area and stored in the stockpile areas or windrowed at the top of the excavation. The vegetation can either be harvested and stockpiled separately, scraped at the same time as the surface material and stockpiled together, or hydroxide, chopped, broken, or chipped and mixed into the topsoil. Any vegetative debris greater than 0.5-foot in any dimension will be stockpiled separately from the topsoil.

Fines salvaged from processing and sedimentation ponds will be used to augment the amount of growth media available for reclamation. It is estimated that approximately 3.7 acre-feet of processing fines will be available for resoiling. With an estimated 3.0 acres that have been previously disturbed, resoiling with fines will be required to be a minimum of six inches deep, but may be approximately one-foot deep.

Native surface materials will be stored in the stockpile area or windrowed at the top of the excavation area, and will be kept separate from processing and sedimentation pond fines. Native topsoils will be spread on the slopes first, with the remaining, if any spread on the pit bottom. All other areas will receive processing and sedimentation fines. These fines will be stockpiled separately from topsoil and will be placed in the stockpile area delineated on the site plans.

Prior to spreading the growth media, all compacted areas will be decompact (ripped or disced) to facilitate root growth. The topsoil that was stockpiled or windrowed on the side of the pit will then be respread to a depth of six inches over the disturbed slopes and roughened to form a variety of microsites. This can be accomplished by rough grading, imprinting, or other suitable method. Reseeding will immediately follow the spreading and roughening of topsoil. Any woody debris what was stockpiled separately, will then be distributed over the site in a random manner.

The remaining area will be resoled with sedimentation and processing fined. Immediately following the spreading of the se fines, the area will be roughened and reseeded.

REVEGATION

Revegetation treatments of will strive to achieve visual integration with surrounding vegetation and provide wildlife habitat values. Seeding of the site will take place during the fall, late October to December

Seedbed Preparation

After re-spreading the topsoil, duff, or fines, the area will be roughened to form a variety of microsites; this can be accomplished by "track walking" the site or by imprinting. The growth media will be prepared to provide a firm, but not overly compacted seedbed.

Seed Sources, Mixtures and Rates

Many Plant species are comprised of local ecotypes that are highly adapted to the local climate and edaphic conditions (Plummer et al. 1955, 1968). The Plants that will have the best chance of survival are those ecotypes that are growing on (or near) that site (Millar and Libby 1989). Besides the problem of purchasing a less adaptive ecotype, one could also cause genetic contamination of the local ecotype through interbreeding with an introduced ecotype. The best policy is to collect the material from or near the site.

Therefore, plant materials for each of the specified species should be obtained from the same region as the mine site, with the property owner's permission. For the purposes of MS #300, the collection region will be defined as Desert Saltbush Scrub (Holland 1986) vegetation types that occur within the Owens Valley, between Olancha and Big Pine.

The following seed mix is proposed for use on all areas of this site. Changes to this seed mix will only be allowed with the concurrence of Inyo County.

SCIENTIFIC NAME	COMMON NAME	PERCENT PURITY	PERCENT GERMINATION	PLS POUNDS/AC
<i>Atriplex hymenelytra</i>	Desert holly	80	40	7
<i>Kochia californica</i>	Red molly	30	40	1
<i>Atriplex confertifolia</i>	Shadscale	80	50	2

Seeding rates are given in pounds of pure live seed (PLS) per acre and are based on the above listed percent purity and germination rates. Percent pure live seed can be calculated from commercial or custom collected seed by the following formula:

$$\%PLS = \frac{\% \text{pure seed} \times \% \text{germination}}{100}$$

If seed conforming to the requirements for purity or germination is not readily available, seed not conforming to these requirements may be used provide that the application rate for such seed is increased to compensate or the lower PLS. The seed application rate can be adjusted based on the preceding formula to compensate for germination or purity below of above that specified.

Seeding Methods

Over most of the site, the seed will be broadcast and then mixed into the top ½ -inch of the substrate by either raking or dragging a chain across the seedbed, or other suitable method.

Mulches

The native vegetative debris will serve as a native mulch.

Irrigation

The species selections for this pit are native to the area and are saline, alkaline, and drought tolerant. However, many species tolerant to high levels of salt and alkali germinate only during wet years when salt/alkali content of the soil-water is significantly decreased. The use of irrigation on this site would probably aid germination; however, it would also serve to increase growth of weedy species, thereby increasing the competitive advantage of the weedy, exotic species, such as Russian thistle. Therefore, irrigation is not currently recommended for seeded areas on this site.

Plant Protection Measures

No protection will be provided for the seeded areas, except as a remedial measure.

Plant Eradication Measures

If Russian thistle invades revegetated areas to the point that it is impacting the germination and /or growth of desired species, then this invasive exotic will be manually removed from the site as a remedial measure.

EROSION AND SEDIMENT CONTROL

Erosion and sediment control will be achieved by implementation of the previously described drainage and revegetation plans. Soil berms will be constructed in conformance to the drainage plan. Resoiling and reseedling will be performed according to the revegetation plan.

PUBLIC SAFETY

The configuration of the mined lands, will not pose a hazard to the public. Hazardous materials associated with mining and processing will be stored properly on site; and prior to reclamation, will be disposed of properly off site. The steep slopes of the wave-cut terraces, as well as other steep slopes both on and of site, are natural features.

PERFORMANCE STANDARDS

The following discussion sets forth minimum site criteria, or performance standards, for the various aspects of site reclamation. Monitoring of reclamation performance standards will be conducted by a qualified individual or group of individuals, agreed upon by Caltrans and Inyo County.

Erosion and Sediment Control

Erosion and sediment control monitoring will be completed at the same time and frequency that used to vegetation monitoring is done. The results will be used to aid in identifying areas of potential failures and to require the use of remedial measures before problem areas cause widespread failures.

Sedimentation basins will be inspected following the season's first storm event or at a minimum of annually. Basins will be cleaned out as needed to maintain a minimum storage capacity.

Slope Stability

With the exception of minor road cuts, no large man-made slopes shall be steeper than 3:1 (H:V), which has been determined to exceed the slope stability standard for this material for all except the most severe earth quake events.

Revegetation

Undisturbed site-indigenous shrub cover was estimated at eight percent for perennial species and one percent for annuals. All phases of reclamation will strive to achieve this standard.

MAINTENANCE, MONITORING, and REMEDIAL MEASURES

Site maintenance and monitoring will continue until Inyo County deems reclamation complete.

Erosion and Sediment Control

All erosion and sediment control structures will be maintained and monitored annually for as long as mining and reclamation continues. This shall be done to ensure that the failure of one or more structures does not apply additional and unplanned stress on other structures.

If infilling or failure of a structure occurs, steps to repair the original structure will be taken. Infilled structures will be cleaned out.

Slope Stability

All slopes will be assessed, during annual monitoring to ensure that they are stable. If excess slope erosion is observed, or failures noted, the appropriate remedial measures will be implemented. All pit slopes will be no greater than 3:1 (H: V), except where minor road cuts occur.

Revegetation

Revegetation of the site will be monitored following implementation on each phase. Monitoring activities will take place during the peak flowering season, approximately April to May. Once the monitoring date is set, monitoring of the site during later years will occur within two weeks of that original date. This scheme will assure that the data will be comparable over time.

Revegetation monitoring will consist of visual assessments and recording the progress of reclamation with photographs. The species composition, shrub cover, and shrub density will be recorded on a County Approved Form (an example is included in Appendix B).

If it appears that the site will not meet the performance standards, then the investigator shall suggest remedial measures. Appropriate remedial measures are listed in Table 4.10-1.

Visual

The cliffs northeast of the site will be monitored annually to ensure that the appearance and structure of the cliffs are not being affected by mining or reclamation activities. The cliffs should be visually similar to the surrounding landforms, with no evidence of erosion or failures caused by mining or reclamation activities.

REPORTING

Once the reclamation activities have been completed, monitoring activities will commence and will continue until the County is satisfied that performance standards have been met. Reporting of the progress of reclamation will be transmitted to Inyo County on an annual basis. This annual report will, at a minimum consist of the name and credentials of the investigator(s), a summary, the date of the visit(s), the methods and materials used, the date collected, an analysis of the data and performance standards, and any suggested remedial measures.

INTERIM MANAGEMENT PLAN:

Section 2727.1 defines "Idle" means to curtail for a period of one year or more surface mining operations by more than (90) percent of the operations previous maximum annual mineral production, with the intent to resume those surface mining operations in the future. Section 2770(h) (1) States that within 90 days of a surface mining operation becoming idle, the operator shall submit an interim management plan to the lead agency for approval. Because of the nature of borrow pit operation, Caltrans has submitted with the reclamation plan an interim management plan. The plan basically insures that public safety and reclamation standards are maintained during these idle periods of operation. This plan should be considered integral with the proposed plan.

DEPARTMENT OF CONSERVATION - OFFICE OF MINE RECLAMATION (OMR) COMMENTS:

Pursuant to the State Mining and Reclamation Act of 1975 (SMARA), Inyo County has submitted the Reclamation Plan to OMR for a 30-day review and comment period on April 30, 1997.

Inyo County has reviewed OMR's comments (see attached) and prepared the following written responses to address the issues. Most of OMR's comments have been incorporated into the Reclamation Plan; many were incorporated prior to the receipt of comments on May 27, 1997. Comments were due May 27, 1997.

Office of Mine Reclamation Comment May 27, 1997)

1. SARA Section 2772(c)(3) requires that the reclamation plan include a termination date. The reclamation plan stated that the operation will continue for 25 years. We recommend that a termination date (month/year) be included in the reclamation plan.

County of Inyo Response June 13, 1997

1. County staff concurs. Caltrans has been working on this reclamation plan since 1992. The reason it has taken so long is Caltrans refused to pay the processing fees by the County. To facilitate the processing of these pits Inyo County Road Department agreed to pay the processing fees and gain access to this pit. If Caltrans had established a closing date in 1992 the pit would only have an effective life of 25 years. The plan is to close the site thirty years from planning commission approval. Or no later than August 31, 2027 .

Office of Mine Reclamation Comment (May 27, 1997)

2. SMARA Section 2772(c)(5) address the requirement for site maps. We recommend that the plan maps be revised to show the following features:

- The mining phases referred to in Section 4.10.3 of the plan.
- The reclamation boundaries for final project. For example, reclamation of the northern portion of the existing disturbance shown on Map Sheet 1 is not addressed in the reclamation plan.
- The location of the wave cut terrace in plan view.
- The horizontal scales for cross-sections. If the scale used on the plan view (1" = 100') pertains to the cross-sections, the setback from the wave terrace is approximately 200 feet.
- The benchmark which depth of excavation will be measured.
- The location(s) of the topsoil stockpiles. Topsoil stockpiles should not be placed in any areas that may receive concentrated run-off.

County of Inyo Response June 13, 1997

2. County staff concurs. The exact mining plan needs to be known. Admittedly, Caltrans is a little vague about the mining plan and reclamation plan. However, because of the nature of Caltrans operation at all their borrow pits, including Keeler, is on an intermittent basis. This means that nothing may be removed from this pit for several years then several thousand tons may be removed in a few weeks, with nothing removed again for several years. It is felt that this is the phased mining Caltrans is talking about in this pit.

The maps need clarification on several points. These clarifications will be addressed by conditions of approval in the recommendations in the staff report.

It has been pointed out, to the County, by Caltrans that the Department of Conservation assembled these reclamation plans in the first place, and that the maps are the maps drawn by DOC. Therefore, the inadequacies these maps can be attributed to DOC. As stated above, they will be corrected by conditions of approval in the staff report.

Office of Mine Reclamation Comment May 27, 1997

2. The reclamation plans states that potential hazards to the public are not anticipated as a result of this project. Fencing, gating, or signing are not discussed. We recommend that this site be fenced or gated to minimize public access.

County of Inyo Response June 13, 1997

2. County Staff concurs. The operation must consider the safety of the public. The hazards in a mining operation can be considerable to the unsuspecting public. However, the nature of this operation would preclude any danger to the public. While

equipment is on site Caltrans shall require security at the pit. This will also be covered in the conditions of approval.

Office of Mine Reclamation Comment May 27, 1997

4. The reclamation plan maps show the locations of grade stabilization structures and drainage diversion berms. Specifications for these proposed structures should be included in the reclamation plan and be part of an overall drainage plan for the mine site as required by SMARA Section 2773(a).

County of Inyo Response June 13, 1997

4. County Staff concurs. Caltrans shall provide specifications for the said structures. Specifications shall agree with the calculations for a 20 year one hour intensity storm flows for this site. These requirements shall be set fourth in the conditions of approval in the staff report.

Office of Mine Reclamation Comment May 27, 1997

5. SMARA Section 2773(a) establishes the mandatory requirement for performance standards for topography, erosion control, sediment control, and revegetation. No performance standards for erosion control and sediment control are provided in the plan, and table 4.10-1 states that remediation would occur if water erosion is "excessive." To be effective, this performance standard must provide quantitative measurements against which success or failure of erosion control treatments can be measured. We recommend that the reclamation plan establish erosion control objectives that reference a unit area. For example, the erosion control standard could be stated as "no rills or gullies equal to or greater than five feet in length and three inches in depth on any area larger than 20 feet X 20 feet." This level of specificity will create a 'trigger point' after which remedial measures would be implemented.

County of Inyo Response June 13, 1997

5. County Staff concurs. Reclamation standards must be a part of the reclamation plan. Plans without standards mean nothing. Revegetation standards will be outline in the conditions of approval in the staff report.

Erosion control standards an not necessary because of the arid nature of this area. Minor rills will not alter the nature of this site and in fact will help the site blend in with the surrounding area. Revegetation and mulching will help at the time of reclamation in controlling erosion. Major erosion will be controlled by the larger berms installed to keep storm flows out of the pit. The storm flows that do enter the pit will pond in the lowest part of the pit. The area of influence that can enter the pit is very small.

The location of this pit and its relation to the highway does not change. Storm flows are directed to away from the pit, to the access road's exit off the highway. This reclamation plan does not alter this in any. The only diversion is to keep the storm flows out of the pit.

Office of Mine Reclamation Comment May 27, 1997

5. Installation of stream diversion structures may be subject to a California Department of Fish and Game (DFG) Streambed Alteration Agreement pursuant to Fish and Game Code Section 1600 *et seq.* We recommend the applicant consult with DFG regarding the requirement for such an agreement.

County Response June 13, 1997

5. County Staff does not concur. The flows off the hill behind, or to the east is basically sheet flow. The suggestion that a stream alteration agreement is required is to suggest that any project regardless of location is required to have such a permit.

Office of Mine Reclamation Comment May 27, 1997

6. Depth to groundwater is not stated in the reclamation plan and should be provided. Without this information, it will not be possible to ascertain when mining depth of five feet above groundwater is reached (See Section 3.4.2.1).

County Response June 13, 1997

6. County Staff concurs. The knowledge of the depth to ground water is vital to the depth of mining when mining is not intended to go below the depth of ground water. However, groundwater is not expected to be found at the depth mining is planned.

Office of Mine Reclamation Comment May 27, 1997

7. The reclamation plan proposes to conserve the upper six inches of soil for use in reclamation, and we strongly support this proposal. We recommend that the reclamation plan describe how this material will be protected from wind and water erosion until it can be reapplied. As stated above, the plan maps should indicate the location of the topsoil Stockpile(s). We strongly recommend topsoil stockpiles be protected from inadvertent excavation or compaction by flagging, fencing, or some other long lasting and visible border. This is especially relevant to this mine site, given the proposed long-term use and critical importance of topsoil re-application for desert revegetation.

County Response June 13, 1997

7. County Staff concurs. The topsoil stockpiles will be protected from inadvertent mining of said stockpiles. Stockpiles will be clearly identified and marked so they will not be mistaken for regular material.

Office of Mine Reclamation Comment May 27, 1997

8. CCR Section 3705(I) states that "soil stabilizing practices shall be used where necessary to control erosion and for successful plant establishment." Mulching is not discussed in the

plan except as a remedial measure although site soils are susceptible to wind and water erosion. We recommend that a rock mulch be used on un-vegetated surfaces, stockpiled waste fines, and topsoil stockpiles. A mulch will protect surface from erosion until plants become established.

County Response June 13, 1997

7. County Staff does not concur. Mulching is a viable method of stabilizing the surface of the ground when the surface has been disturbed. Mulching with straw and vegetative material is viable in establishing seedlings. The use of rock mulch could be viable in more populated areas of the state. In considering the material at this site and the it is felt that rock mulch would be an expense that would not be cost effective in reducing wind erosion. The native material may blow a little but not much more than non disturbed areas.

Office of Mine Reclamation Comment May 27, 1997

9. CCR Section 3503(g) requires that revegetation be appropriate for the setting of the site, and that available research be used to address revegetation methods and the selection of species for the site. The reclamation plan proposed to re-seed the site for revegetation even though the site receives approximately three inches of rain annually. Revegetation efforts on xeric sites such as this have shown that successful revegetation requires installation of containerized plants grown from site-indigenous species rather than reliance on seed application.

We recommend that the applicant install revegetation test plots, as required under Section 3705(b), to demonstrate that seeding the site will result in successful revegetation and will meet specified performance standards. The test plots should be designed to analyze seed application strategies, e.g., imprinting, harrowing, broadcasting, ect., as well as the use of supplemental irrigation and soil amendments. Under this scenario, installation of containerized plants can be used as remediation if seeding is not successful. If used, containerized plants should be over-planted by at least 50 percent to offset plant mortality.

County Response June 13, 1997

9. County Staff does not concur. Revegetation plans propose to use a native seed mix. This has been the recommended procedure for every other reclamation plan in the County. In fact many times natural reseeding is suggested with reseeding implemented as a remedial measure.

The small size of this pit indicates that test plots are not needed. The long life of the pit also indicates that older portions of the pit will be reseeded prior to closure of the pit.

Office of Mine Reclamation Comment May 27, 1997

10. CCR Section 3705(m) requires that revegetation success be quantified by cover, density, and species-richness. Specific information on native plant density, cover, and species-richness is not given in the reclamation plan. We recognize that this site is extremely arid, has saline-

alkaline soils, and has a very sparse cover of vegetation. Based on information provided by DOC to Caltrans, live shrub cover on the site is 8 percent, perennial species density is two-four plants per 100 square feet, and species richness is two perennial species per 100 square feet. Due to the low natural plant cover, a cover performance standard would not be appropriate for this site. We recommend, therefore, the plan provide density (the number of plants per unit area) and species richness (number of different types of perennial species per unit area) performance standards. The reclamation plan should clarify proposed revegetation standards: *density* standards are stated in table 4.10-1 as percentages and Section 4.9.3 states that revegetation performance standard will be eight percent plant *cover*.

The following performance standards can be used for this site:

- A density of three perennial plants per 100 square feet.
- Perennial (herbaceous or woody) species richness of two species per 100 square feet.

County Response June 13, 1997

10. County Staff concurs. Performance standards will be set forth in the conditions of approval. The mechanism for releasing financial assurances needs performance standards to measure success of reclamation.

Office of Mine Reclamation Comment May 27, 1997

11. in addition to providing technical assistance and review of reclamation plans, the Office of Mine Reclamation is authorized to review cost estimates prior to lead agency approval of the financial assurances for reclamation per SMARA Section 2773.1. We recommend that the financial assurances estimate be revised to include the establishment and monitoring of revegetation test plots, monitoring following implementation.

County Response June 13, 1997

11. County Staff concurs. Financial assurances will be recalculated and reviewed prior to approval of the reclamation plan.

STAFF ANALYSIS:

Planning Department Staff has reviewed the proposed reclamation plan as well as all comments received. Along with this information and the initial study that was prepared, Staff feels that the borrow pit can be reclaimed with the recommended conditions of approval proposed below under Recommendations. This reclamation plan, with the conditions of approval, can accomplish the required reclamation under the Surface Mining and Reclamation Act of 1975 and the requirements of Chapter 7.70 of County Code (Inyo County Mine Reclamation Ordinance).

FINANCIAL ASSURANCES:

The applicant has formulated financial assurances for this reclamation plan, as required by SMARA. The Planning Department has reviewed the proposed reclamation procedures, costs and the proposed financial assurances in the amount of \$11,751.00 However, after review the

Planning Department has determined financial assurances of \$13,788.54 are required. The difference is due to Caltrans not calculating seed cost correctly. Caltrans also failed to calculate the cost of mulching the site. All labor and equipment costs used were Caltrans figures. Caltrans failed to include contingencies in their calculations.

ENVIRONMENTAL REVIEW:

An Initial Study and Draft Mitigated Negative Declaration was prepared and circulated for this project pursuant to the requirements of the California Environmental Quality Act (CEQA). To date, the only comments received have been the comments from the Office of Mine Reclamation and the Department of Transportation. Comment period ended July 8, 1997.

PUBLIC NOTICE:

Notice of this public hearing has been published in the *Inyo Register* and mailed to all property owners within 300 feet of the subject property. To date, comments have been received from the California Department of Conservation, Office of Mine Reclamation and Caltrans (see attached). These comments are attached.

RECOMMENDATION:

Staff recommends the Planning Commission **approve** Reclamation Plan # 96-12 Keeler Borrow Pit/MS #300 by taking the following actions:

- A. Based upon the Initial Study and all written and verbal comments received, adopt the Mitigated Negative Declaration of Environmental Impact and certify the requirements of the California Environmental Quality Act have been satisfied.

[Evidence: In accordance with the requirements of the California Environmental Quality Act, an Initial Study and Draft Mitigated Negative Declaration of Environmental Impact were prepared and circulated for public comment.]

- B. Find the proposed reclamation plan conforms and meets the requirements of Chapter 7.70 (Mining & Reclamation) of Inyo County Code and State Mining Reclamation Act of 1976.
- C. The site has been subject to previous surface mining activity, and any surface disturbance as a result of future reclamation measures will not result in a significant loss of native vegetation or wildlife habitat. Any degradation to vegetation and wildlife habitat as a result of project approval, as conditioned, would be less than significant, and therefore, *de minimus*.

(Evidence: Based upon past surface disturbance and the photographs entered into record, any degradation to existing vegetation and wildlife habitat from proposed reclamation measures would be less than significant and therefore de minimus, as stated in Fish and Game Code 711.4)

D. Approve Reclamation Plan No.96-12/Keeler Borrow Pit, MS #300

CONDITIONS OF APPROVAL:

Term of Plan and Timing of Reclamation

1. The term of the reclamation plan shall not exceed thirty years from the date of approval, or no later than August 31, 2027. Total amount of usable aggregate and waste material that can be removed from this pit is 120,00 cubic yards. If 120,000 cubic yards are removed prior to the termination date, reclamation shall proceed with in six months of the removal of the 120,000 cubic yards. The Planning Commission may grant an extension. The applicant must submit a complete reclamation plan application for an amended reclamation plan. To assure continued operation, the above application should be received prior to the expiration date.

Interim Management Plan

2. Through out the 30-year life of this project, the interim management plan shall be implemented during periods of "idle" operation. If zero production occurs for a period of five consecutive years, the reclamation plan shall be implemented immediately. Mining can not occur until an amended reclamation plan is submitted and approved by the Inyo County Planning Commission.

Mapping

3. Caltrans shall provide the County with a contour map with two-foot contours within three years of approval of this reclamation plan.

Salvage of Growth Media (Topsoil)

4. The top six inches (6") of growth media (topsoil), shall be collected from areas to be disturbed (Borrow pits and internal access roads). This (topsoil) shall be stockpiled in the active work site until final phase reclamation.
5. After the site is recontoured, the salvaged topsoil shall be respread to a depth of six inches over the recontoured pit. (See condition #4)

Equipment and Trash Removal

6. At the conclusion of each phase of mining and reclamation, all equipment and trash shall be removed from the area. No asphalt may be buried onsite.

Erosion Control

7. Pit slopes shall be contoured to a minimum of 1:3 (Vertical: Horizontal). These slopes shall be in established during times of intermittent operation, times the interim management plan is in affect, and during final reclamation.
8. Drainage structures are to be built as depicted on the plot map

Earthwork

8. All compacted areas shall be scarified. Road berms shall be brought back into the roadway after scarification.

Noxious Weed Control

9. During mining and reclamation activities and during idle periods noxious weeds shall be controlled on site.

Seed Sources and Mixtures

10. Seed used for revegetation shall be collected on or near the site. If sufficient seed is not available, it may be purchased. A seed mix of plant species native to the site shall be used:

Scientific Name	Common Name	PLS Pounds/acre
<i>Kochia californica</i>	Red molly	7
<i>Atriplex hymenelytra</i>	Desert holly	1
<i>Atriplex confertifolia</i>	Shadscale	2
<i>Atriplex canescens</i>	Fourwing saltbush	3
<i>Grayia spinosa</i>	Hop-sage	3
Total pounds live seed per acre		16

These native species should be obtained from seed stock found within five miles of the borrow site and within the Desert Saltbush Scrub plant community. If purchased, the seed shall be certified originating in the Owens Valley. Reseeding shall take place during the fall.

Mulching

11. A mulch of native vegetative material and straw shall be applied at a rate of 1000 lbs. per acre into the seeding program. This mulch shall be crimped into the slope to provide both wind and water erosion control and seed holding. This will enhance revegetation.

Revegetation Methods

12. After scarification, the approved seed mix shall be broadcast and then mixed into the top one-half inch (1/2") of the substrate by either raking or dragging a chain across the seedbed. This shall be done perpendicular to the slope of the pit.

Revegetation Performance Standard

13. Reclamation will not be considered successful or complete until vegetative density reaches 50 percent (number of plants per unit area) of the surrounding undisturbed land with a 70 percent diversity (species richness) of the perennial species on surrounding undisturbed land. New perennial species shall be at least two years old before considered viable plants. Cover shall be 50 percent of the surrounding undisturbed ground. This shall be verified based upon visual calculations and substantiated by past photographs of the site including off site photographs of the surrounding undisturbed lands.

Monitoring

14. From initial seeding, the project shall be monitored until performance standards are met. Remedial measures may be implemented any time to insure revegetation success. For the first two years, monitoring shall be performed twice a year.

Remedial Measures

15. If it appears the site will not meet the performance standard, the applicant shall consult with the Planning Department for recommendations on remedial measures. The remedial measures listed below shall be considered if reclamation problems are observed during annual monitoring:
 - a. Mulching and/or fertilizing to supplement growth media;
 - b. Reseeding;
 - c. Irrigation;
 - d. Planting of appropriate containerized plants and protection of these plants.
 - d. If irrigation is used the plants must make it on their own for two years.
 - e. Analysis of soil for problems;
 - f. Measures to reduce pest problems, including fencing individual plants.

Reporting and Annual Inspections

16. Each year the applicant shall file an annual mining report with the State. These reports shall be filed until financial assurances are released. Monitoring activities will continue until the County is satisfied that performance standards have been met. In accordance with SMARA Section 2774 (b), Inyo County as the Lead Agency shall inspect the site and file annual inspection reports with the State.

Inyo County Road Department

17. Caltrans shall allow Inyo County Road Department to remove material from this site. Caltrans shall be responsible for all reclamation requirements, including bonding and reporting. When Inyo County Road Department uses this pit, they shall adhere to the conditions of approval for this reclamation plan. Inyo County shall report the quantity of material to Caltrans each calendar quarter.

Reclamation Responsibility Statement

18. The applicant shall submit a notarized statement to the Inyo County Planning Department accepting responsibility for reclaiming lands as per the conditions specific herein.

Financial Assurances

19. Financial assurances in the sum of \$13,788.54 are required in the form of a surety bond, irrevocable letter of credit, cash or certificate of deposit. Government agencies may also use budget set asides, or pledge of revenue to post their financial assurances. Financial assurances shall be posted with the Inyo County Planning Department. Said assurances shall be made payable to the County of Inyo and the Director of the California Department of Conservation and The Bureau of Land Management.

Financial Assurance Recalculation

20. Financial assurances shall be recalculated each year in accordance with Section 2773.1(a)(3) of SMARA and Inyo County Code. This shall occur at the time of annual inspection.

Release of Financial Assurances

21. As required reclamation standards are achieved, that portion of financial assurances covering the completed activity may be released. The remainder of financial assurances covering revegetation and monitoring shall not be released until the revegetation performance standards is met.

Hold Harmless

22. The applicant, landowner, and operator shall defend, indemnify and hold harmless Inyo County, its agents, officers and employees from any claim, action, or proceeding against the County, its agents, officers and employees to attack, set aside, void, or annul any approval of the County, its advisory agencies, appeal boards, or its legislative body concerning Reclamation Plan No. 96-12/ Keeler Borrow Pit, MS 300.

Attachments: Vicinity Map

Department of Conservation, Office of Mine Reclamation, Comments of May 27, 1997,

Department of Transportation Comments of May 29, 1997.

Date	Reviewer	Initials
7/1/97	Project Planner	
7/1/97	Review Planner	CD
7/1/97	Planning Director	R
	Secretary	

MATERIAL SITE #300
(KEELER PIT)
RECLAMATION PLAN

OCTOBER 30, 1995

RECEIVED
95 NOV -8 AM 11:39
RIDGECREST RESOURCE AREA
RIDGECREST, CA.

California State Department of Transportation
(Caltrans) District 9
500 S. Main Street
Bishop, California 93514

TABLE OF CONTENTS

	page
1.0.0 INTRODUCTION.....	1
1.1.0 APPLICANT.....	1
1.2.0 LANDOWNER.....	1
1.3.0 OPERATOR.....	1
1.4.0 LESSEE.....	1
1.5.0 LOCATION.....	2
2.0.0 DESCRIPTION OF ENVIRONMENTAL SETTING.....	6
2.1.0 SITE ACCESS.....	6
2.2.0 TOPOGRAPHIC MAP.....	6
2.3.0 GENERAL GEOLOGY.....	6 & 9
2.4.0 GENERAL HYDROLOGY.....	12
2.5.0 SOIL RESOURCES.....	12
2.6.0 VEGETATION.....	15
2.7.0 WILDLIFE.....	18
2.8.0 AIR RESOURCES/CLIMATOLOGY.....	19
2.9.0 LAND USES AND AESTHETICS.....	20, 21
3.0.0 DESCRIPTION OF PROPOSED MINING OPERATION.....	23
3.1.0 DIMENSIONS, ACREAGE.....	23
3.2.0 INITIATION AND TERMINATION DATES.....	23
3.3.0 PRODUCTION SCHEDULE.....	23
3.4.0 MINING PLAN.....	23
3.5.0 PROCESSING EQUIPMENT.....	25
3.6.0 WATER REQUIREMENTS.....	25
3.7.0 ENERGY REQUIREMENTS.....	26
3.8.0 NOISE AND EMISSIONS.....	26
3.9.0 HOURS OF OPERATION/NUMBER OF EMPLOYEES.....	26
3.10.0 TRANSPORTATION.....	26

4.0.0 DESCRIPTION OF PROPOSED RECLAMATION.....	28
4.1.0 SUBSEQUENT USES.....	28
4.2.0 IMPACT ON FUTURE MINING.....	28
4.3.0 RECLAMATION SCHEDULE.....	28
4.4.0 POST-MINING TOPOGRAPHY.....	28
4.5.0 RESOILING.....	29
4.6.0 REVEGETATION.....	29
4.7.0 EROSION AND SEDIMENT CONTROL.....	31
4.8.0 PUBLIC SAFETY.....	31
4.9.0 PERFORMANCE STANDARDS.....	31
4.10.0 MAINTENANCE, MONITORING AND REMEDIAL MEASURES.....	33
4.11.0 REPORTING.....	33
5.0.0 COST OF RECLAMATION.....	35
6.0.0 APPLICANT STATEMENT OF RESPONSIBILITY.....	35
7.0.0 REFERENCES.....	35, 37

FIGURES

	page
1. Regional Location	3
2. Assessor's Parcel Map	4
3. Project Location and Access	5
4. Topographic Map of Project Site	7
5. Geologic Map of Project Site	10, 11
6. Geologic Cross Section	10, 11
7. Watershed Map of Project Site	13
8. Soil Map of Project Site	16
9. Grain Size Distribution Curves	17

TABLES

	page
1. 2.4-1 Calculated Peak Flows For Three Major Watersheds/Drainages Using SCS Method	14
2. 3.4-1 Calculated Onsite Total Runoff Using Rational Method For Runoff Accumulation Area (Base of Pit)	27
3. 4.6-1 Proposed Seed Mix	30
4. 4.10-1 Remedial Measures	34

PHOTOS

1. Looking Southwest Across MS #300	8
2. View of MS# 300 from Highway 136	22

MAP SHEETS

1. Existing Site Conditions
2. Initial Reclamation and Mining Plans
3. Reclamation Treatments
4. Final Site Configuration

APPENDICES

- A. COUNTY MINING/RECLAMATION PLAN APPLICATION
- B. MONITORING DATA SHEET
- C. INTERIM MANAGEMENT PLAN (IMP)

MATERIAL SITE #300 RECLAMATION PLAN

1.0.0 INTRODUCTION

Caltrans, under a permit with the Bureau of Land Management (BLM), will mine sand and gravel on federal lands near Keeler, California. The triangular site encompasses 100 acres, of which 4.8 acres will be mined in a single phase of 30 years duration, to a depth no greater than 40 feet below natural grade. This document presents a plan for reclamation of these lands.

This reclamation plan describes a process that will minimize environmental impacts during and resulting from mining, implement reclamation activities as soon as possible, and return the mined-lands to a condition suitable of supporting open space and wildlife habitat.

1.1.0 APPLICANT

California State Department of Transportation (Caltrans) District 09
500 S. Main Street
Bishop, California 93514
(619) 872-5204

1.1.1 Representative

Luis Elias, Senior Transportation Engineer
California State Department of Transportation (Caltrans) District 09
500 S. Main Street
Bishop, California 93514
(619) 872-5204

1.2.0 LANDOWNER

U.S. Department of the Interior
Bureau of Land Management (BLM)
300 S. Richmond Road
Ridgecrest, CA 93555
(619) 384-5400

1.3.0 OPERATOR

California State Department of Transportation (Caltrans) District 09
500 S. Main Street
Bishop, California 93514
(619) 872-5204

1.4.0 LESSEE

California State Department of Transportation (Caltrans) District 09
500 S. Main Street
Bishop, California 93514
(619) 872-5204

1.5.0 LOCATION

This aggregate pit is located on BLM land near Owens Lake in Inyo County. The pit is adjacent to and east of Highway 136 at post-mile marker 15.5. The pit is approximately 2.6 miles southeast of the town of Keeler. (Figure 1, Regional Location)

1.5.1 Assessor's Parcel Number

This property is also known by Assessor's Parcel Number 31-010-19 (Figure 2, Assessor's Parcel Map).

1.5.2 Township, Range, Section, Quadrangle

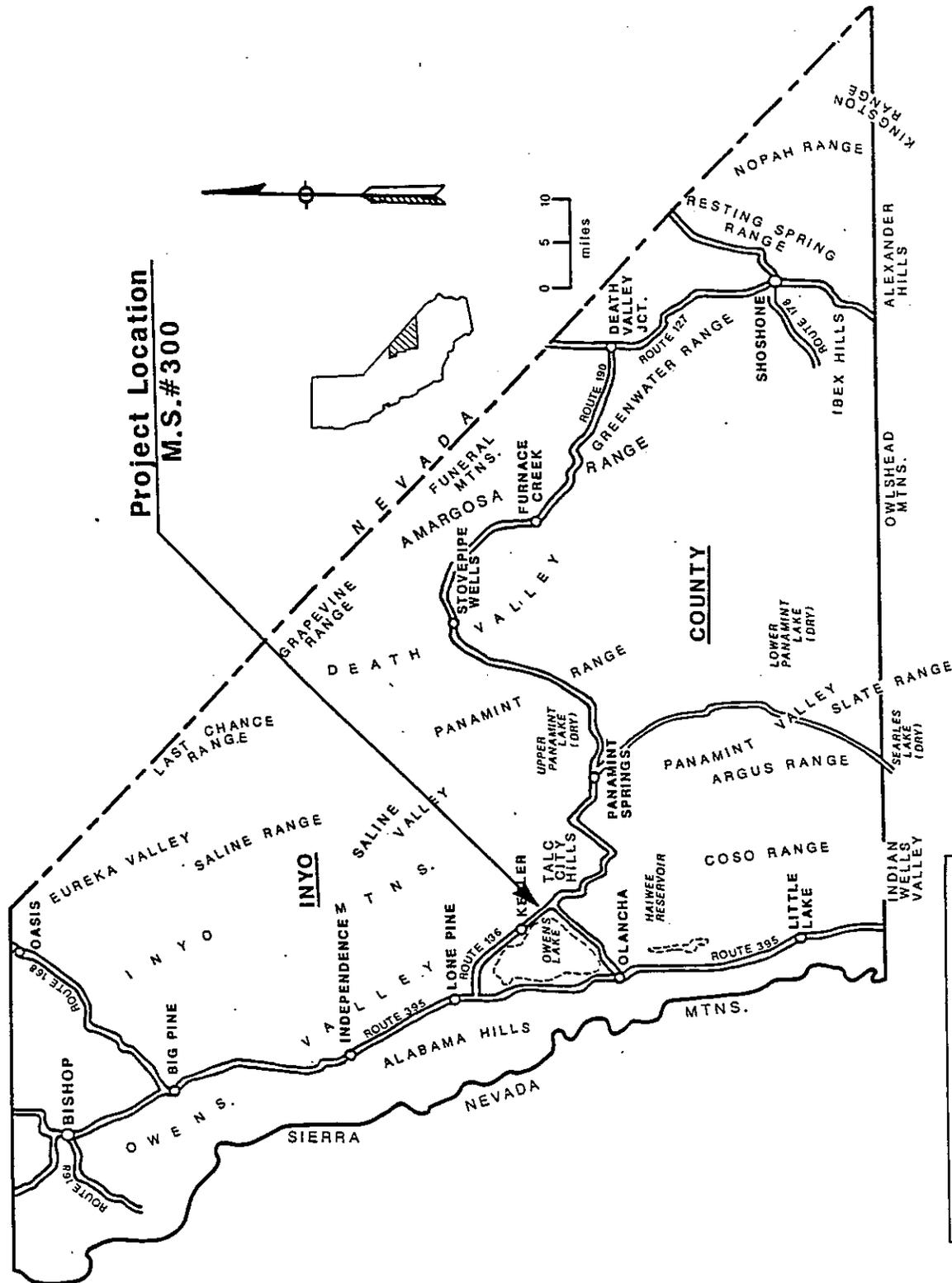
The project site is located on the Keeler, California USGS 7.5' Topographic Map in Township 17 South, Range 38 East, in the eastern 1/2 of Section 15, MDBM (Figure 3, Project Location and Access).

1.5.3 Latitude, Longitude

The center of the project site is located at latitude 36°27'30" North, longitude 117°0'30" West.

1.5.4 Claim Descriptions

This project site is known by BLM and the County of Inyo as the Keeler pit, and as State Material Site (MS) #300. The project name used for the purposes of this document will be MS #300.

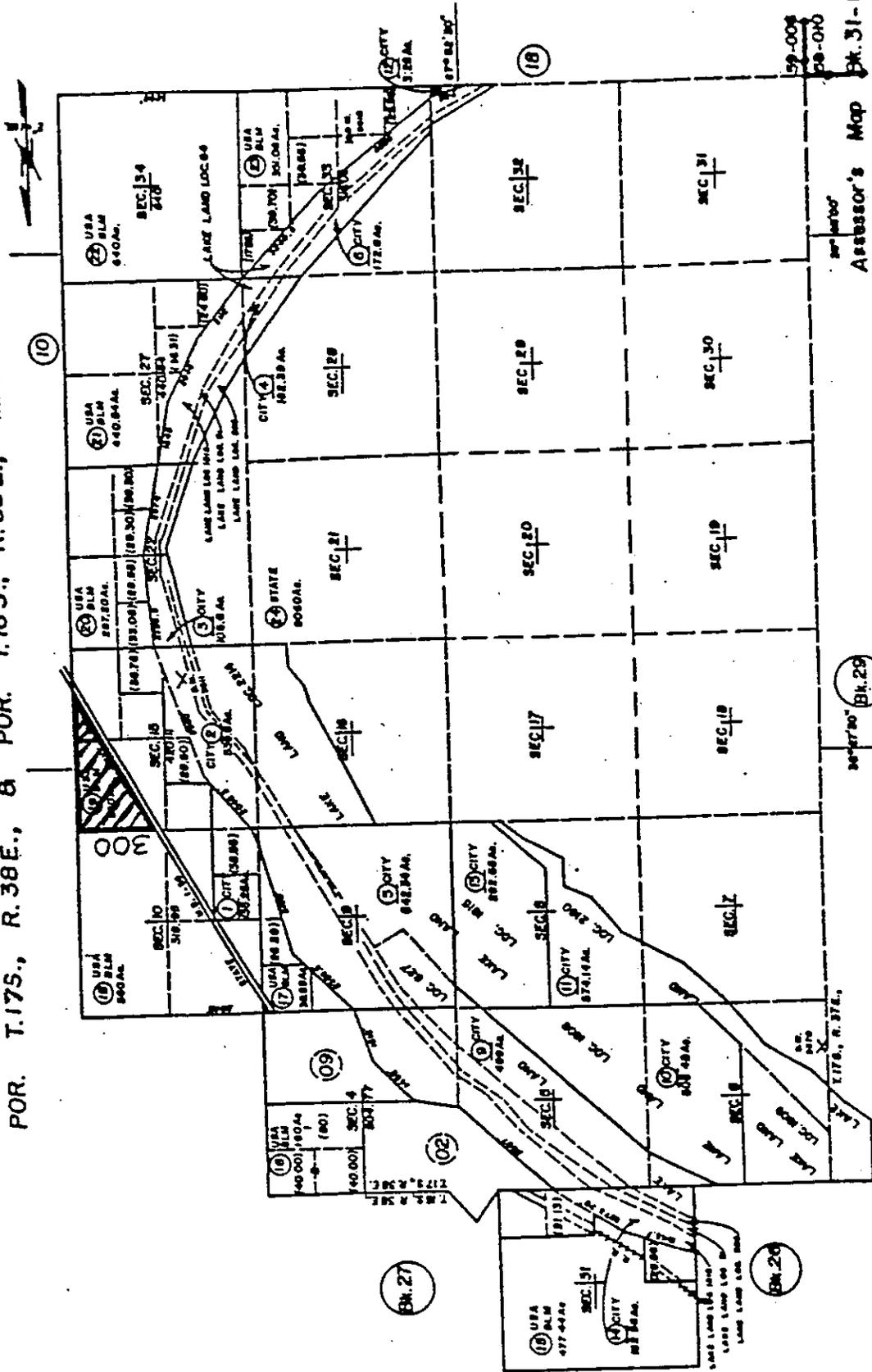


**Figure 1: Regional Location.
Caltrans Material Site #300**

TAX RATE AREA
59-006

31-01

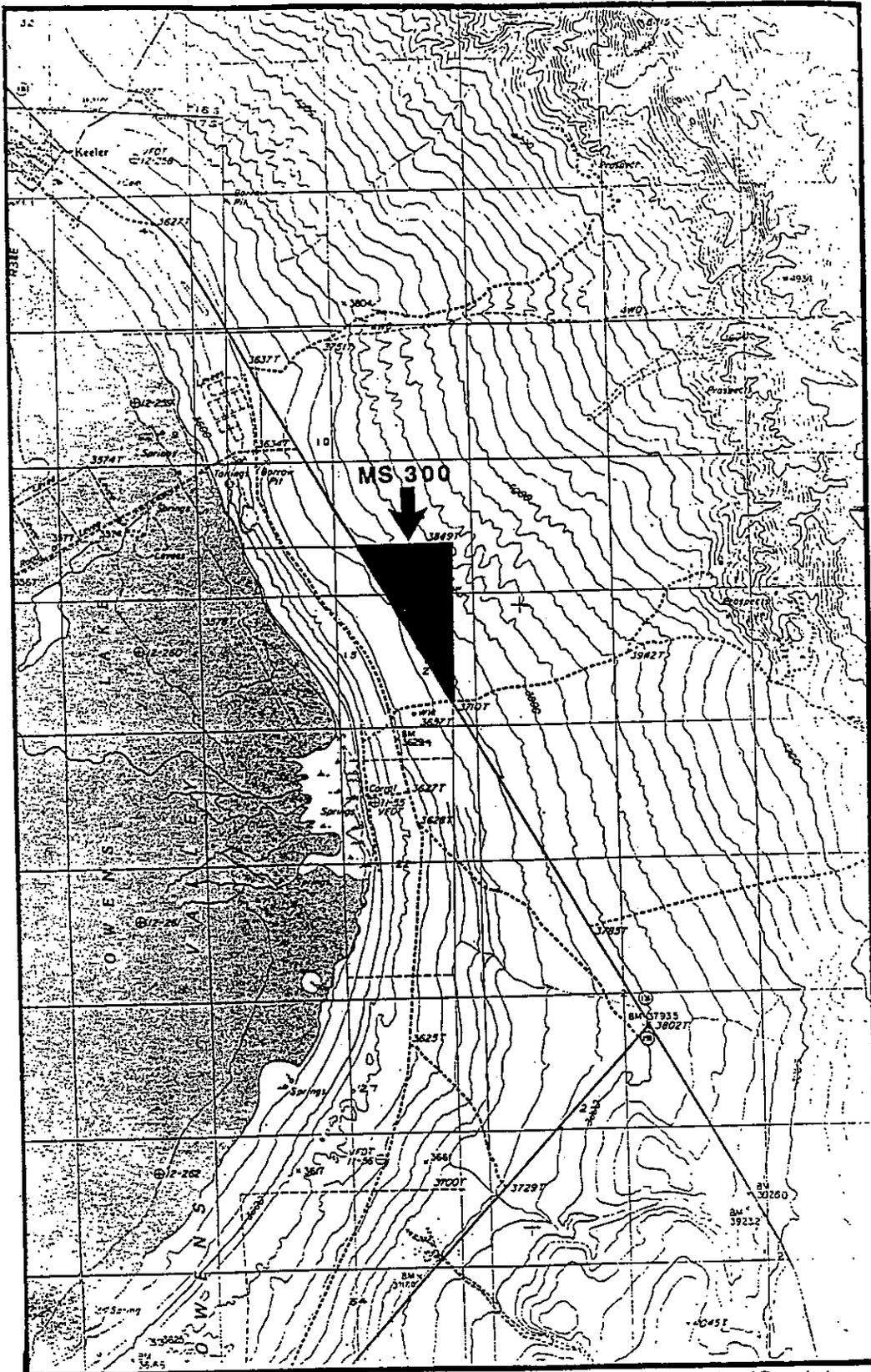
POR. T.175., R.38E., & POR. T.16S., R.38E., M.D.B. & M.



Assessor's Map
County of Inyo, Calif.
1950

NOTE - ACREAGES ARE APPROXIMATE.

Figure 2: Assessors Parcel Map.
Caltrans Material Site #300



Modified from USGS 7.5 minute Keeler, California Quadrangle (Provisional edition 1987)

**Figure 3: Project Location and Access.
Caltrans Material Site #300**

0 1 MILES



2.0.0 DESCRIPTION OF ENVIRONMENTAL SETTING

2.1.0 SITE ACCESS

Access to the site is via an unmarked dirt road leading northeast from Highway 136 at post-mile marker 15.5, approximately 2.6 miles southeast of the town of Keeler (Figure 3 - site access).

2.2.0 TOPOGRAPHIC MAP

Figure 4 depicts the site's location in the northeast portion of USGS 7.5-minute Keeler quadrangle (Provisional Edition 1987). On this map, the material site is designated by a mining symbol and the words "Borrow Pit." Because the contour interval for the topographic map is 40 feet, the excavated area of the pit is not well defined on the map. Photo 1 shows the current extraction area of the mine site.

As shown on Figure 4, the site is at the toe of an alluvial fan and has a slope of about 5° to the west-southwest. Elevations at the site range from approximately 3850 feet in the northeast to about 3670 feet in the southwest producing approximately 180 feet of relief. A break in the overall slope of the site occurs along an elevated topographic bench, or terrace, which trends northwest-southeast through the middle portion of the material site. The terraced area is entrenched by several large drainages which enter the site from the northeast.

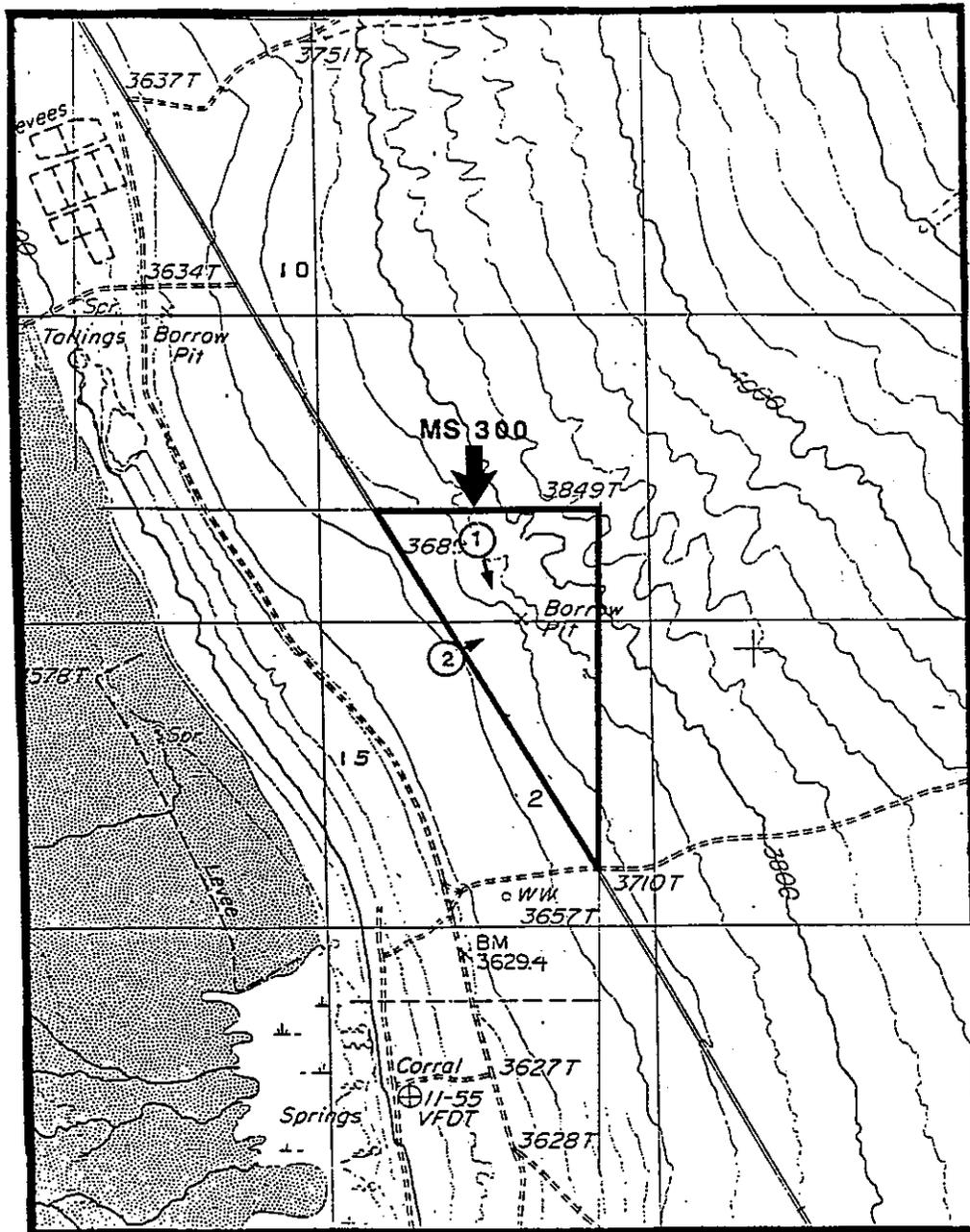
2.3.0 GENERAL GEOLOGY

The Owens Valley is a structural low, or graben, that separates the Sierra Nevada, to the west, from the Inyo Mountains, to the east (Figure 1). The edge of the dry Owens Lake bed, which is within this graben, is approximately 3/4 of a mile west of the site.

2.3.1 Site Specific Geology and Geologic Cross Section

A reconnaissance geologic assessment of the site was performed on August 25, 1992. MS #300 is located on Quaternary alluvial fan deposits formed by drainages feeding from the Inyo Mountains into the Owens Valley (Figure 5; Stinson 1977). The eastern portion of the site contains older Quaternary gravel deposits that have been dissected and eroded by the younger drainages. As evidenced by the nearly straight cut slope along the west side of the terraces, these older deposits have also been eroded by wave action from high water stands of the ancient Owens Lake (Figure 5; Stinson 1977).

Figure 6, also from Stinson (1977), is an east-west trending cross section showing the subsurface geology approximately 1/2 mile to the north of the material site. Because of the site's proximity to the cross section, this section closely represents the subsurface geology beneath the material site. As shown in this figure, the younger alluvium in the area is at least 200-feet deep and is underlain by approximately 800 feet of older alluvium and gravel deposits; the depth to bedrock (the Pennsylvanian and Permian Keeler Canyon Formation) can be extrapolated at approximately 1000 feet below the surface. Due to the proximity of the site to Owens Lake, the underlying alluvial sediments will likely contain occasional lenses of fine-grained lake deposits. Surficial gravels and boulders observed at the site are composed predominantly of black to dark-gray basalt and limestone. It can be deduced from the geologic map that the primary source rocks for the younger alluvium are the reworked sediment from the older alluvial and gravel deposits, basalt from the Triassic volcanic rocks, and limestone and shale from the Paleozoic-age Owens Valley and Keeler Canyon formations exposed in the Inyo Mountains.



Modified from USGS 7.5 minute Keeler, California Quadrangle
(Provisional edition 1987)

0 1 MILE

- ① → Photo 1 point location
- ② → Photo 2 point location



Figure 4: Topographic Map.
Caltrans Material Site #300



Photo 1: View looking southeast across MS#300.

2.3.2 Ore Body/Deposit Being Mined

This material site was developed by Caltrans as a source of sand and gravel for road maintenance. The Quaternary alluvial deposits will be the source for this sand and gravel. Generally, the material being mined varies in texture from a clayey gravel with sand [Unified Soils Classification System (USCS) designation of GC] to a poorly graded sand with gravel (USCS designation of SP)(see Section 2.5.2).

2.3.3 Slope Stability

Existing slopes at the site are generally shallow to moderate, ranging from 5° to 35° angles. The steeper slopes on the site exist along the edge of a natural wave-cut terrace in the central portion of the site. The terraced material is composed of partially cemented sands and gravels representative of the older alluvial deposits. A 20-foot mining setback from the base of all wave-cut terrace slopes will reduce the impacts of mining on the stability of these steeper slopes.

2.3.4 Seismicity

The site is within an area of active seismicity. There are several northwest and northeast trending faults to the east of the site. Because they displace the Quaternary age, basalt flow unit, they are at least Quaternary in age (Jennings 1992). They separate the valley region from the mountainous areas, so they probably have a strong vertical component of offset with east side up.

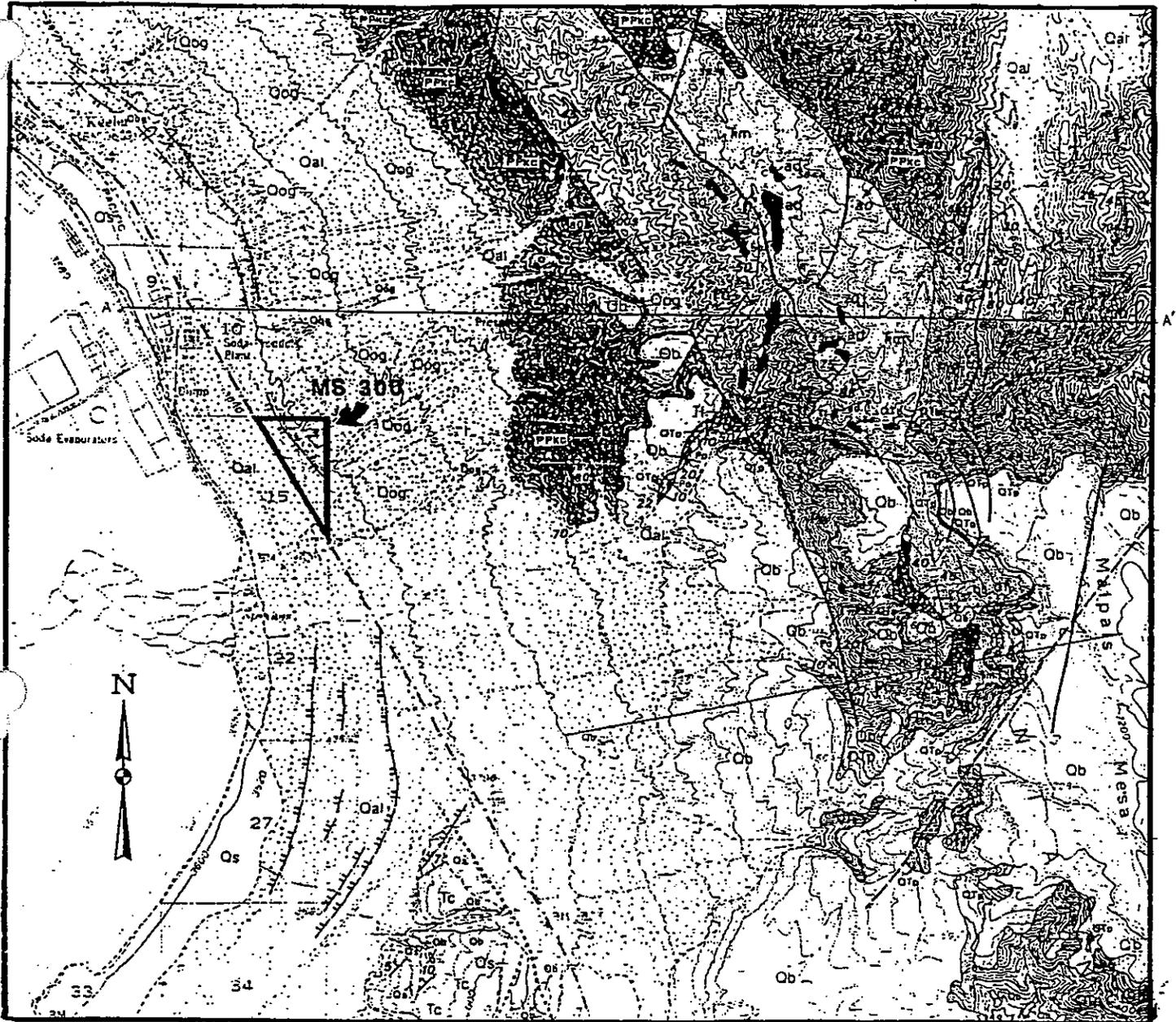


Figure 5.

Modified from Stinson (1977)

0 1 2 Miles

Figures 5 and 6: Geologic Map and Cross Section, Caltrans Material Site #300

*Figure 6 and Legend for both figures on following page

Legend for figures 5 and 6:

- Qal Quaternary younger alluvium
- Qs Quaternary sand dunes
- Qoa Quaternary older alluvium
- Qog Quaternary older gravel deposits
- Qb Quaternary basalt flows

- QTP Quaternary-Tertiary bedded basaltic lapilli tuff
- QTB Quaternary-Tertiary olivine basalt flows

- Tc Tertiary Coso Formation (undifferentiated sedimentary rocks)

- ad Mesozoic altered andesite porphyry dikes and associated rocks
- T_RV Triassic volcanic rocks and land-laid deposits
- T_RM Triassic marine rocks (limestone and shale)

- Po Permian Owens Valley Formation (limestone, shale, and conglomerate)
- PPKc Permian-Pennsylvanian Keeler Canyon Formation (silty and sandy limestone and shale)

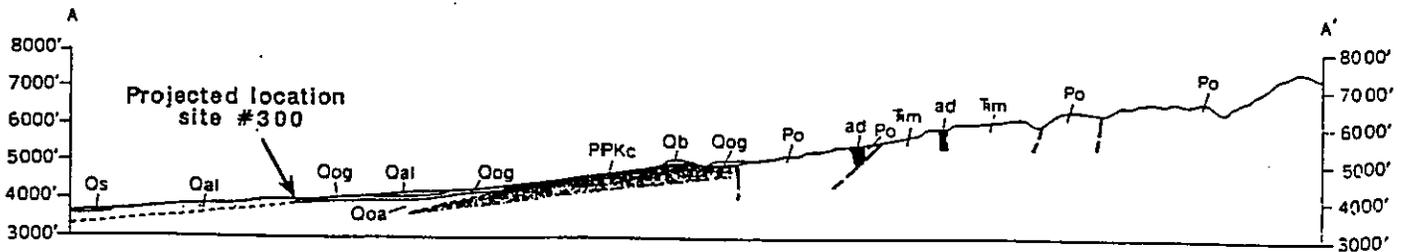
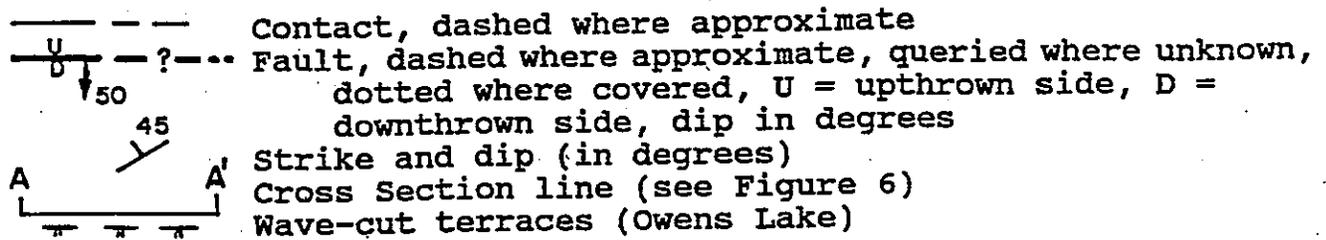


Figure 6.

Figures 5 and 6 continued from previous page

2.4.0 GENERAL HYDROLOGY

The character of the surface and ground water regimes at the site are directly related to the existing topography, geology, and climate of the region. Surface waters drain from the mountains to the northeast, across the alluvial fans where the site is located, and flow into Owens Lake. The site is located on the northeastern edge of Owens Lake, at the southern extreme of Owens Valley. As such it receives among the lowest precipitation in the Valley. The historic mean annual precipitation at Keeler is 3.1 inches per year (Vaughn 1980). Precipitation and runoff from large storm events in the region occur predominantly in the winter months.

Ground waters generally follow the flow direction of the surface waters. In alluvial fan deposits, the water-table gradient is a subtle expression of the land surface, unless there are changes in the subsurface stratigraphy or structure. The predominant source for ground water in the region is infiltration of surface water along the mountain front. Ground-water sources of less significance occur from recharge along influent, or "losing", stream drainages and from direct infiltration of precipitation.

2.4.1 Site Specific Hydrology

Figure 7 shows the three large watersheds that feed the drainages that cross the material site. All three watersheds drain from the bedrock area in the mountains approximately six miles northeast of the site. The watershed for the drainage that enters the northern half of the site, designated as Drainage 1 in Figure 7, has an area of approximately 2,562 acres. The other watershed that enters the northern half of the site, Drainage 2, has an area of approximately 1,472 acres. The watershed for the drainage that enters the site to the south, Drainage 3, has an area of approximately 1,745 acres. All three drainages typically flow only during times of intermittent, intense precipitation.

2.4.2 Area Hydrogeology

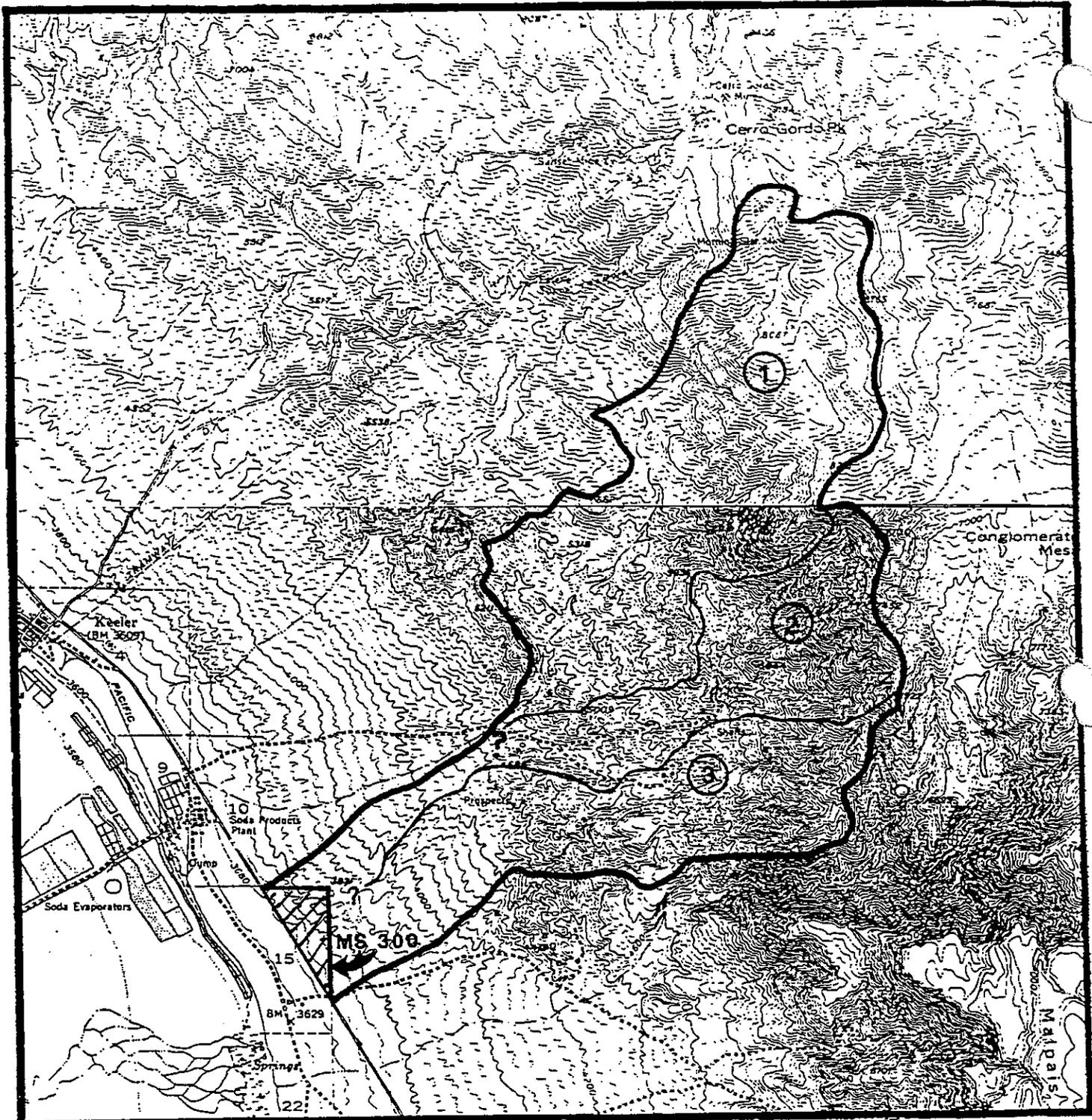
The dominant ground-water source in the area of the material site is the valley fill/alluvial deposits underlying the site. Ground-water data from Keeler, which is approximately 3 miles to the north and at a slightly lower position on the alluvial fan as the material site, is used to characterize the ground-water regime beneath the site.

2.4.3 Water and Land Uses

The land at the material site is controlled by Bureau of Land Management (BLM) for the U. S. Department of the Interior (USDI). In and around Keeler, evaporate minerals are mined by private companies along the edge of Owens Lake. Ground water in the area is presently being used by the private mining companies and the community of Keeler.

2.5.0 SOIL RESOURCES

As discussed previously, the site is located on alluvial fan deposits. Alluvial soils are controlled by the parent material in the surrounding mountains, by the age of the various depositional units of each fan, and by the grain-size distribution of the parent material deposited on the fan.



Base map modified from USGS 15-minute New York Butte (1950) and Keeler (1951) quadrangles.



- ①
 - ②
 - ③
- Watershed/Drainage Numbers



**Figure 7: Watershed Map.
Caltrans Material Site #300**

TABLE 2.4-1: CALCULATED PEAK FLOWS FOR THREE MAJOR WATERSHEDS/DRAINAGES USING SCS METHOD

DRAINAGE NUMBER (Figure 7)	WATERSHED AREA (acres)	TIME OF CONCENTRATION (hours)	PEAK FLOW - 20 YEAR STORM(1) (cubic feet per second)
1	2,562	1.98	1,198
2	1,472	1.32	708
3	1,745		
Total	5,779		1,906

(1) Peak precipitation intensities (i) were calculated using methodologies described in DWR Bulletin 195 (1976). This method uses mean annual maximum 1-hour storm as a percentage of the mean annual precipitation, and various statistical coefficients to estimate precipitation intensity for 20-year return period storm. The time of concentrating value was used in the SCS TR-55 Tabular Method (USDA-SCS 1986) for calculating peak flow. An area-weighted average runoff curve number of 80 and a Type II rainfall distribution was used.

2.5.1 Soil Map

Alluvial fans typically have coarse textured soils with little pedogenic development. The A-horizon, if present, is generally less than five inches thick and is directly underlain by a thick C-horizon, essentially unaltered alluvium. The alluvial material originates from basaltic and carbonate rock sources. A USDI-BLM Soil Survey (1983) mapped the area west of Highway 136, directly adjacent to the material site (figure 8).

2.5.2 Grain-Size Analysis of Soil Samples

Soil samples were taken during the reconnaissance geotechnical survey of the site. Figure 9 shows grain-size distribution curves from sieve analyses performed on two native soil samples, from the top of the terrace (Sample #1) and from within the wash (Sample #4), and two samples from disturbed areas, from a stockpile (Sample #2) and from within the pit (Sample #3). The samples from the wash and the stockpile are texturally similar, with gradations ranging from poorly graded sand with gravel (SP) to a well-graded sand with gravel and silt binder (SW-SM), suggesting that the stockpile material was probably mined from the wash deposits. The soil sample from the base of the existing pit is a poorly graded sand with gravel and silt binder (SP-SM). The soil sample from the terraced area to the east of the existing pit is a clayey gravel with sand (GC). Because of a textural gap between the clay and gravels in the terraced area, it is probable that the soil has been subjected to intense winnowing by wind and rain and that the sandy portion of the soil has been eroded away leaving a lag layer of compacted surface gravel. A contributing factor for this excess erosion in the terraced soil is the fact that it is older than other soils in the area, which increases its time of exposure to weathering.

The matrix portion of the site soils (sand to clay) was generally light yellowish gray in color and relatively loose. The gravel clasts ranged in color from gray to black, were predominantly angular in shape, and generally ranged in size from two to six inches.

2.5.3 Existing and Potential Erosion

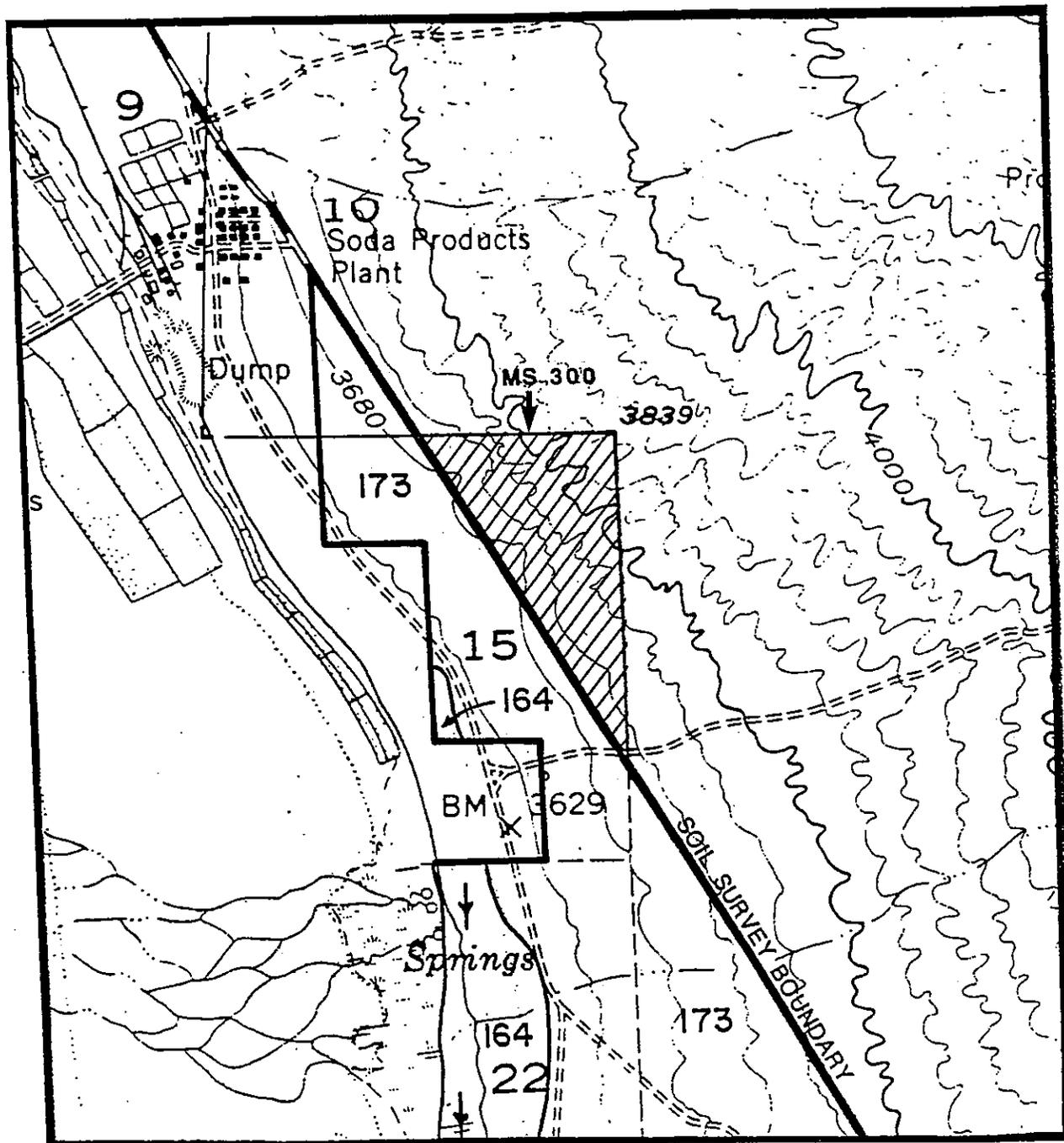
Alluvial soils in the desert region of California are generally susceptible to wind erosion due to sparse vegetative cover and lack of soil structure. The published soil survey states that the potential for soil erosion caused by wind is low.

2.5.4 Reclamation Potential

Well-developed soil horizons are not present at the site. The site consists of alluvial deposits, with coarse textured soils that have a low water-holding capacity and are high in alkali. The native soil surface contains a large amount of gravel and cobble size fragments, which will aid with erosion control. Revegetation of these soils will need to be limited to native species which are adapted to these alkaline and droughty conditions.

2.6.0 VEGETATION

The site was surveyed on May 6, 1992, and again on February 4, 1993. Standard methodologies (Mueller-Dombois and Ellenberg 1974, Nelson 1988) were used to survey the site for special plant species, to document existing vegetation, and to determine appropriate revegetation strategies. The site is located in the northern portion of the Hot Desert Floristic Province, very near to the Great Basin Floristic Province (Barbour and Major 1988). Taxonomy generally follows Munz (1959, 1968) and common names are from Jaeger (1969).



Modified from BLM (1983)

SOIL NAMES:

- 164 Victorville-Villa families complex, 0 to 2 percent slopes.
- 173 Yermo extremely gravelly sandy, 2 to 5 percent slopes.

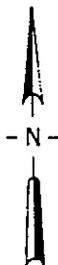
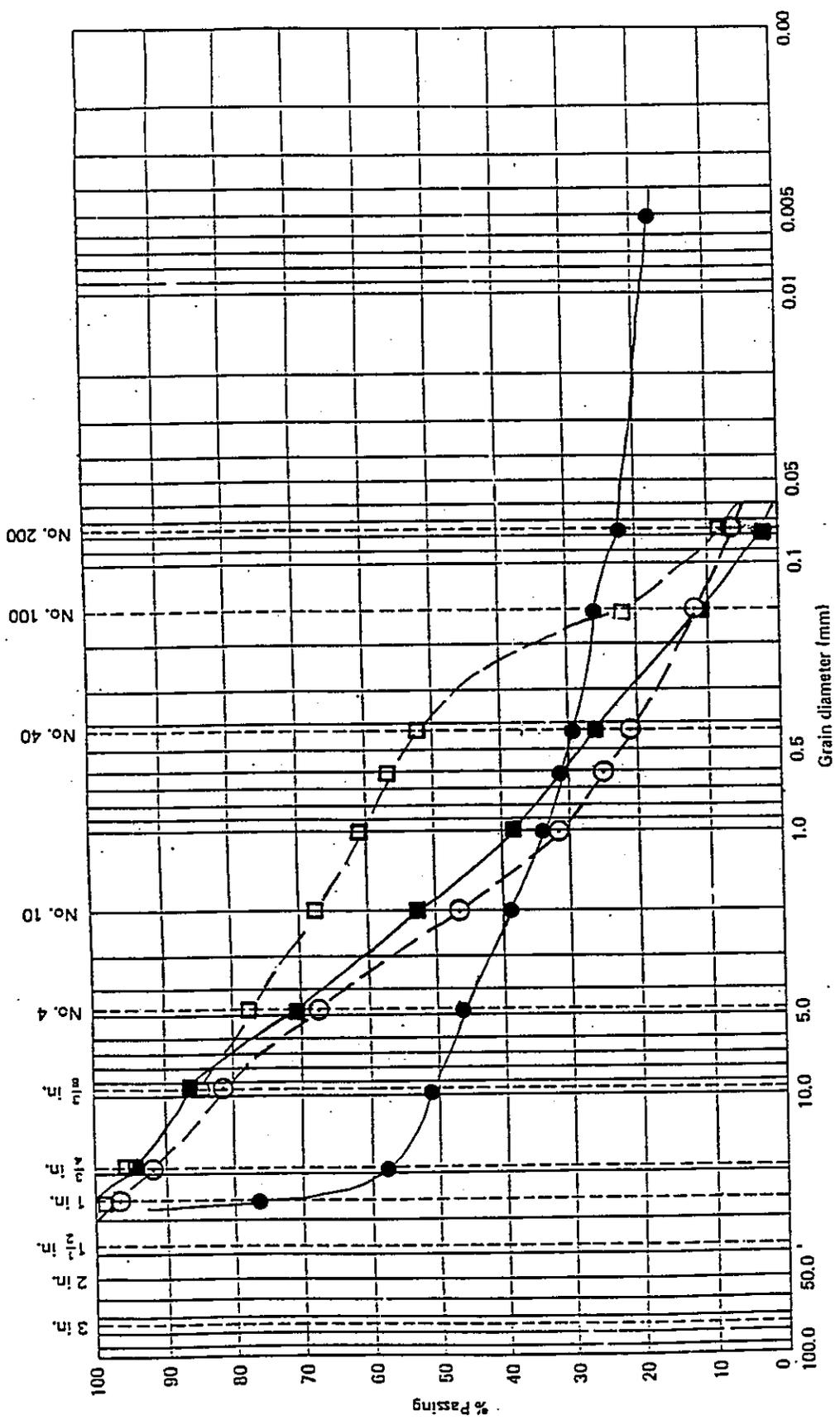


Figure 8: Map of nearby soil types.
Caltrans Material Site #300



SAMPLES WITHIN PIT:

- SAMPLE #2 (STATION E) well-graded SAND with gravel, silt binder (SW-SM)*
- SAMPLE #3 (STATION F) poorly-graded SAND with gravel, silt binder (SP-SM)*

NATIVE SURFACE SOILS:

- SAMPLE #1 (STATION M) clayey GRAVEL with sand (GC)*
- SAMPLE #4 (STATION H) poorly-graded SAND with gravel (SP)*

* Unified Soils Classification System

Figure 9: Grain size distribution curve.
Caltrans Material Site #300

2.6.1 Description of Affected Area

The extraction area occurs within a xerophytic phase of the Desert Saltbush Scrub. This xerophytic phase occurs on dry, coarse soils, and is low in stature (1-2 feet tall). Previously mined areas are devoid of vegetation, while the undisturbed portions of the site support a vegetation assemblage that is low in total cover.

The dominant feature of this site is exposed soil and coarse fragments. The undisturbed portion of the mine site is sparsely vegetated with a depauperate mixture of species, largely from the chenopod family. These species are tolerant of saline and alkaline soils.

2.6.2 Unique/Critical Communities

The California Natural Diversity Data Base (1992) does not list any unique or critical plant communities for the Keeler, 7.5' Quadrangle. No unique or critical plant communities were observed on the mine site during the survey.

2.6.3 Special Plant Species

According to the California Natural Diversity Data Base (1992), two sensitive plant species are known to occur in the vicinity of the mine site. Habitat for these two species does not exist on the site. The absence of rare, endangered, threatened, and sensitive plant species on this site was confirmed during the site visit.

2.6.4 Invasive Exotics

A limited population of Russian thistle exists on the mine site in disturbed locations.

2.6.5 Revegetation Potential

The Mojave desert environment imposes severe constraints on successful revegetation with rainfall as the primary limiting factor. It has been suggested that conditions favorable to vegetation re-establishment are infrequent, occurring during a series of wetter than normal years or during cycles of cooler and more humid climatic conditions (Zedler and Ebert 1977, Moon 1990).

Additional constraints to successful revegetation include a list of interactive factors such as herbivory, drought, soil salinity/alkalinity, desiccating and eroding winds, low soil fertility, low soil water holding capacity, and extremely hot temperatures. Normally, only a very small portion of desert plant seedlings survive to maturity.

Re-establishment of vegetation on this site will be very limited due to the alkaline and droughty nature of the soil. The coarse fragments (cobbles and gravel) present on the surface of this alluvial fan provides protection from wind and water erosion, with a negligible contribution by vegetation. Erosion control can be accomplished using the native coarse-grained soils and salvaged vegetative debris (the combination of which is termed "duff").

2.7.0 WILDLIFE

The site was surveyed on May 6, 1992, and again on February 4, 1993. Ravens and a desert tarantula (*Aphonopelma chalcodes*) were observed on the site during one of the site visits. Also, there was sign of ungulates, carnivores, and birds on the site.

2.7.1 Description of Habitats

This site contains a native Desert Saltbush Scrub plant community (Holland 1986). The site supports an assemblage of arthropods, reptiles, birds, and mammals typical of alluvial fans in the southern portions of Owens Valley. Many of the animals of the region are found both in the Great Basin and the Mojave Deserts. The mine site and the surrounding area contain habitat for lizards such as the western whiptail, desert horned lizard, side-blotched lizard, and longnosed leopard lizard, and snakes like the red coachwhip, speckled rattlesnake, and common king snake.

Birds of the region include golden eagle, red-tailed hawk, greater roadrunner, lesser nighthawk, black-throated sparrow, and common raven. In addition to those that live year-round in the area, many birds migrate through it in spring and fall.

Most desert sites contain small mammals. This site contains generalized habitat for such common mammals as California myotis, desert woodrat, Merriam's kangaroo rat, long-tailed pocket mouse, desert cottontail, black-tailed hare, coyote, bobcat, and ringtail.

2.7.2 Unique/Critical Habitats

The California Natural Diversity Data Base has no records of unique or critical habitats for the USGS Keeler, California Quadrangle (CNDDDB 1992). In addition, no unique or critical habitats were identified on the site during the site survey. However, the ancient shoreline bluffs northeast of the site are significant visual features, and may serve as incidental nesting sites for common bird species, rodents, and reptiles.

2.8.0 AIR RESOURCES/CLIMATOLOGY

The closest established weather station is located in the town of Keeler, approximately 2.6 miles northwest of the material site at an elevation of 3620 feet.

2.8.1 Precipitation

The Owens Valley is located in a transition zone between the climates of the Mojave Desert, the Great Basin, and the Sierra Nevada, with a significant influence of the Mediterranean climate of the Pacific Coast. High intensity convective thunderstorms from the Pacific Ocean approach out of the northwest during late fall and winter. The Sierra Nevada greatly reduces the moisture content of these storms; most of their moisture is deposited on the west side of the Sierra and on the crest. Approximately 80-95 percent of the total precipitation in the region falls between late October and April. Short but intense scattered summer thundershowers from the Gulf of Mexico account for the remaining 5-20 percent of the precipitation of the region. Snow contributes very little, if at all, to the total precipitation in the area of the mine site (Vaughn 1980).

The site is located on the northeastern edge of Owens Lake, at the southern extreme of Owens Valley. As such it receives among the lowest precipitation in the Valley. The historic mean annual precipitation at Keeler is 3.1 inches per year (Vaughn 1980).

2.8.2 Temperature

The monthly mean temperatures at Keeler for the months of January and July are 40 and 80 degrees Fahrenheit, respectively. The mean highest temperature is 109 degrees Fahrenheit, and the mean lowest temperature is 13 degrees Fahrenheit. The latest date of the last spring frost is April 20, and the earliest date of the first fall frost is October 15. The growing season at Keeler is 270 days. The length of the frost free season is 225 days (Vaughn 1980).

2.8.3 Air Quality

Air quality in the Owens Valley is typically excellent.

2.8.4 Prevailing Winds

Prevailing winds are from the north or south with average speeds of 5-10 mph. March and April are the windiest months. Strong gusts are common during this time. High gusts of wind can also accompany the periodic thundershowers that are seasonally common in this area (Vaughn 1980).

2.9.0 LAND USES AND AESTHETICS

Land-use on BLM lands within the Owens Valley falls under guidelines presented in the Bishop Resource Management Plan and Environmental Impact Statement (USDI 1991). This plan provides for the protection and enhancement of sensitive environmental elements in the region while allowing for resource use and development. In addition to the BLM guidelines, Inyo County classifies lands according to land-use designations.

2.9.1 Existing and Surrounding Land Uses

The mine site falls within the South Inyo Management Area, the southernmost of the nine management areas identified in the Bishop Resource Management Plan. The management theme of the South Inyo Management Area is to "manage to protect wilderness, wildlife, visual, and cultural values and to enhance recreation opportunities" (USDI 1991). Most of the management decisions for the region focus on meeting visual resource management (VRM) guidelines, protection and enhancement of wildlife habitat, protection of Owens Lake (and indigenous, sensitive wildlife), and protection of the recommended Southern Inyo Wilderness Study Area (USDI 1991). Most of the management objectives are concerned with the proposed Southern Inyo Wilderness Study Area, or with Owens Lake itself. The area of the mine site is not specifically addressed by many of the management decisions presented in this plan; the mine site does not fall within any special management areas. Sand and gravel are considered salable minerals by the BLM and mineral extraction is an allowable use in this area. The site is classed as open space by Inyo County.

As shown on the Existing Site Conditions map (Map Sheet 1), a buried cable exists between the highway and the soil berm, running parallel to both. The owner, use, and depth of the buried cable are unknown. All mining activities will be excluded from the area of the cable.

2.9.2 Visually Sensitive Areas

BLM has developed draft Visual Resource Management (VRM) standards for these BLM lands. The mining site is designated VRM III/C,L,Fg. BLM describes the objectives of the VRM III designation as follows:

"The objective of this class is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention from key observation points but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape (USDI 1991)."

Highway 136 is sparsely traveled by tourists heading toward Death Valley. Therefore, the sensitivity of the area, determined by the number of people that are likely to encounter the area and the frequency of use, is rated low (L). The scenic quality of the area is rated fair (C). The scenic and sensitive qualities of the region are concentrated in the foreground (Fg).

2.9.3 Visual Impact of Mining and Reclamation to These Uses

The mine site is partially visible from very few points along Highway 136 (Photo 2). The existing textural contrast of the site is caused by removal of the course ground-surface layer, and a decrease in the density of the vegetation due to vegetation removal. These changes will be moderated by reclamation activities.

Revegetation with native species and replacement of the course ground-surface fraction will integrate the site with the surrounding area, thereby resulting in a low level of visual change to the characteristic landscape. Reclamation will achieve visual management objectives.

At present, the access road to the pit ascends a slight rise before descending into the pit. This makes the pit nearly invisible from Highway 136 at the access point, the pit depression being below the line of sight from the highway and behind the small acclivity. The access road should be retained in its present configuration in order to assure that the pit is not exposed to direct view from the road.

Photo 2: View of MS#300 looking east from Highway 136.



3.0.0 DESCRIPTION OF PROPOSED MINING OPERATION

The type and extent of mining will affect reclamation planning. The following sections describe the mining operations and identify the aspects of the operation that are pertinent to the design of an effective reclamation plan.

3.1.0 DIMENSIONS, ACREAGE

Material Site #300 occupies approximately 100 acres on BLM land. The triangular site is 3800 feet, north to south, by 2300 feet, east to west, with the southwestern diagonal boundary along the highway. Approximately three acres in the west-central portion of the site have been disturbed during previous mining operations.

The site will be mined in a single 30-year phase with all mining activity occurring west of the ancient wave-cut terrace. As shown on Map Sheet 3, the mining area will encompass approximately 4.8 acres and will be rectangular in shape, 700-feet long and 300-feet wide. A 300-foot mining setback from the highway will be maintained to limit the visual impacts caused by mining activities and to protect the buried cable. In addition, a 20-foot mining setback from the wave-cut terrace will be maintained to reduce potential slope stability problems, to preserve the visual quality of these predominant features, and to reduce impacts to animal habitat on and around the terrace cliffs. All mining excavations will not exceed a depth of 40 feet below the natural land surface.

3.2.0 INITIATION AND TERMINATION DATES

Mining at this site will take place on an intermittent basis. The initial agreement with BLM was signed in September 1984. The termination date for this reclamation plan will be 40 years from the date of reclamation plan approval.

3.3.0 PRODUCTION SCHEDULE

Prior to 1995, it is estimated that 50,000 cubic yards of material have been removed. It is anticipated that approximately 120,000 cubic yards of minerals and waste will be extracted over the next 30 years. Waste is estimated to compose approximately five percent of the extracted volume, which is 3.7 acre-feet, resulting in approximately one-and-one-half times the amount of fines needed for reclamation resoiling to a depth of six inches. The average anticipated annual extraction volume is estimated to be 4,000 cubic yards, with a maximum annual extraction volume of 40,000 cubic yards.

After the completion of the mining phase, final site reclamation will be implemented and it is estimated that monitoring of final reclamation treatments will be completed within 5 years.

3.4.0 MINING PLAN

The site will be mined in a single 30-year phase and will operate predominantly in the central portion of the site, to the west of the wave-cut terrace. A complete description of the management of the site during idle phases, if these occur, can be found in Appendix C,

3.4.1 Initial Site Reclamation Activities

Initial site reclamation will commence after plan approval. These activities will initiate reclamation at the earliest possible time, and minimize erosion and off-site sediment discharge during the mining phase. The following reclamation activities will be implemented (see Map Sheet 2):

Drainage Control: Three material berms will be constructed on the site. As shown on Map Sheet 2, these berms are to be located: 1) across the small drainage that enters the site from the north, 2) along the northern edge of the proposed mining area, and 3) along the southern edge of the proposed mining area (the existing berm along the south side of the existing pit will be reconstructed). Waste material from the mining operation will also be used to construct the berms, bringing the berms into their final configuration. These berms will help direct runoff around the existing pit into the natural drainages to minimize erosion within the pit.

Area of Immediate Reclamation: The dirt access road that enters the material site from the south will be reclaimed. Reclamation of the dirt road will be performed by ripping the dirt road so that it is decompacted and returning the road to its natural grade by pulling the sidecast material back on the roadbed.

3.4.2 Mining Phase

Refer to Map Sheet 3 (Mining Phase) for the locations of operation facilities and other structures.

3.4.2.1 Description of Operations

Material from this site will be used for road maintenance and construction on an as needed basis. Mining will begin north of the existing pit area and will be completed to a depth of 20 feet; this portion of the pit will then become the operations area for the remainder of the mining activities at the site. Mining will then proceed in the southern portion of the mining area to a maximum depth of 40 feet below the native ground surface, which, based on best available information, is at least five feet above ground water level. If perched ground water is encountered during excavations, a new base level will be established for mining at five feet above the encountered ground water. Material will be stockpiled, screened, and mixed within the operations area indicated on Map Sheet 3. Slopes within the pit will be no steeper than 3:1 (H:V), except for minor cuts where access roads enter the pit; these road cuts will be gravel mulched immediately following construction to minimize erosion. A 300-foot setback from the highway and a 20-foot setback from the base of the wave-cut terrace will be implemented for all mining activity.

3.4.2.2 Access Road

As shown on Map Sheet 3, access to the material site will be from Highway 136 along the existing dirt access road entering the site.

3.4.2.3 Topsoil Handling

Topsoil shall be defined as the top six inches of the native soil. Topsoil shall be salvaged from all areas not previously disturbed (1.8 acres). Topsoil will be stored in the operation areas designated on Map Sheet 3, or may be placed in windrows at the top of excavation slopes. Topsoil may be mixed with existing vegetation. Topsoil and vegetation removal will not precede mining by more than one year.

3.4.2.4 Minerals, Overburden and Waste

Stockpiles of usable material will be stored within the operation area shown on Map Sheet 3. Waste fines may be stored in the operation area shown on Map Sheet 3, may be sold off-site, or may be used in the construction of the material berms. A minimum of 1.5 acre-feet of waste fines will be stockpiled for use in final resoiling. Stockpile heights will not exceed 15 feet, with slopes no greater than 2:1 (H:V).

3.4.2.5 Processing

Usable and non usable material will be separated at the screening plant and stored in the stockpile area. Usable material will be mixed on site and then transported to areas of use. Fine-grained, non usable material will be used for berm construction and in resoiling of the site during reclamation.

3.4.2.6 Water Impoundments and Diversions

The berms constructed during the initial site reclamation phase will remain in use during the mining and final reclamation phases.

The base of the pit below the operations pad will become an area of surface-water runoff accumulation for the pit area, as well as, for the terraced area directly upgradient of the pit, a watershed totaling an area of approximately 20 acres. The capacity of this accumulation area is approximately 15 acre-feet which is greater than the expected volume of discharge from a 24-hour storm with 20- and 100-year return periods.

3.5.0 PROCESSING EQUIPMENT

A portable screening operation will be moved onto the site during periods of operation. No permanent buildings or equipment will be constructed on site as part of the mining operation.

3.6.0 WATER REQUIREMENTS

Water requirements for this site will be limited to that needed for processing and for dust control. Water will be purchased from Los Angeles Water and Power and, likely, trucked to the site. Water use during intermittent operations is estimated to range from 100 gallons to 2,000 gallons per day.

3.6.1 Waste Water

The only type of waste water to be produced by this mining operation will be screening water that will be collected in the operations area and allowed to evaporate or infiltrate.

3.6.2 Drinking Water

Water will be trucked to the site from Lone Pine or Keeler to provide safe drinking water for site employees.

3.6.3 Sewage Disposal

During operations, commercial portable toilets will be brought to the site from Bishop or Ridgecrest. The commercial vendor will properly dispose of the waste.

3.7.0 ENERGY REQUIREMENTS

Electricity will be used by the plant for screening, washing, and mixing operations. When electricity is needed for processing, it will likely be provided by a diesel generator. Average diesel consumption will be 20 gal/300 cy of aggregate processed. Electricity will not be needed for reclamation activities.

3.8.0 NOISE & EMISSIONS

Mining operations may include the use of a D8, two loaders, belly dumps, bobtail trucks, a maintenance truck, and haul trucks. This aspect of the mining operation will affect noise and emissions.

3.8.1 Noise

Mineral resource extraction, hauling, screening, loading and other site activities will create noise. The noise emissions will be most heavily concentrated within the processing area of the pit, and will be shielded from surrounding receptors by the pit walls. Both the physical walls of the pit and the large distance to receivers will reduce the potential noise impact from mining.

Effective source strength of a rock plant is around 72-75 Db at 400 feet. Earth-moving activities would typically generate estimated noise levels of 75 and 80 Db at a distance of 50 feet with noise control devices for dozers and scrapers. In combination, the noise exposure at a distance of 2,000 feet would be reduced to approximately 60 Db, which is below most standards for noise-sensitive land-uses. Noise generated from the concurrent reclamation activities (grading and revegetating) will not be perceivable against the noise generated by the mining activities.

3.8.2 Dust, Odors, Vehicular Emissions

Air quality parameters that are potentially affected by aggregate mining operations are vehicular emissions and suspended particulate, or dust. Operations would not significantly increase vehicular traffic on Highway 136. Increased emissions would however emanate from the pit during the active extraction phase. However, the site will be mined in a manner that will result very nearly in the final reclaimed landform; therefore, reclamation activities will not cause an increase in vehicular emissions.

Because the soil disturbance from materials processing, extraction, and hauling is a "fresh" disturbance, the major component of the produced dust will be of large particle size (greater than 10 microns), which settles out rapidly. Best available control technology, such as maintaining a moist aggregate surface, will be used to suppress processing, extraction, and hauling dust sources. Reclamation activities, such as reseeded and resoiling with topsoil mixed with vegetative debris, will also help to control dust.

3.9.0 HOURS OF OPERATION/NUMBER OF EMPLOYEES

The hours of operation may be up to 10 hours per day during the hours of 7:00 am to 5:00 pm. It is estimated that this operation will employ 2-3 people.

3.10.0 TRANSPORTATION

During operational phases, transportation by employees to the mine site will not increase traffic on Highway 136 significantly. Transportation of aggregate resources to road construction locations may increase traffic on Highway 136. It is estimated that during mining operations, haul trucks will make approximately 1-5 round-trips/day.

TABLE 3.4-1: CALCULATED ONSITE TOTAL RUNOFF USING RATIONAL METHOD FOR RUNOFF ACCUMULATION AREA (BASE OF PIT) FOR MATERIAL SITE #300

BASIN INFORMATION		TOTAL RUNOFF PER BASIN (3) (acre-feet/storm event)	
Phase(s) (1)	Location	Storage (acre-feet) Area (acres)	Intensity (i; inches/hour) (2) 24 hour/20 year i = 0.106 24 hour/100 year i = 0.141
MP - Final	Base of Pit	15	1.26
			1.68

- (1) MP = Mining Phase; Final = Final Site Configuration (Reclamation).
- (2) Peak precipitation intensities (i) were calculated using methodologies described in DWR Bulletin 195 (1976). This method uses mean annual maximum 1-hour storm as a percentage of the mean annual precipitation, and various statistical coefficients to estimate precipitation intensity for different return periods (20 and 100 years). Units for the intensities listed are inches/hour.

(3) Total runoff is calculated using the Rational Method outlined in Goldman and others (1986; page 4.2). The formulas for the calculation are:

$$Q = C \times i \times A \quad \text{and} \quad Q_t = Q \times \text{storm duration}/43,560 \text{ (ft}^2\text{/acre)}$$

where, Q = runoff rate, cfs; Q_t = total runoff;
 C = 0.30 = averaged runoff coefficient for existing surface conditions;
 i = precipitation intensity, inches/hour; and,
 A = drainage area for particular basins or runoff accumulation areas, acres.

For a 100-year storm event, the anticipated peak flow from the small drainage that enters pit from terrace area is 5.0 cfs. This is calculated using time of concentration equal to 25 minutes [using methods in Goldman and others (1986)], a peak intensity of 1.1 inches/hour, a drainage area of 15 acres, and a C-value of 0.30.

4.0.0 DESCRIPTION OF PROPOSED RECLAMATION

4.1.0 SUBSEQUENT USES

The land is zoned by Inyo County as open space, with no special land use restrictions. According to various resource maps, the site does not support any designated, critical wildlife habitat; however, the site does provide general habitat values to various wildlife species. The site will be reclaimed to open space and wildlife habitat, which will leave the site in a productive end use that is readily adaptable to alternative end uses.

4.2.0 IMPACT ON FUTURE MINING

Reclamation of this site will not preclude mining at a future date. The aggregate resource extends beyond 100 feet deep; the current mining plan will not have exhausted on-site mineral resources.

4.3.0 RECLAMATION SCHEDULE

Reclamation treatments, such as material berms, will be installed during the initial site reclamation phase. Reclamation treatments such as resoiling and revegetation will be installed when final slopes are present. Once the reclamation treatments have been implemented, those treatments will be monitored until performance standards have been met. The monitoring plan is designed to evaluate site-specific criteria for slope stability, erosion and sediment control, and resoiling and revegetation.

4.4.0 POST-MINING TOPOGRAPHY

Map Sheet 4 depicts the post-mining and reclaimed topography for the mined area. The final site configuration will, in general, be a rectangular-shaped excavated pit into the alluvial fan to the west of the wave-cut terraces, no greater than 40-feet deep, with side slopes no steeper than 3:1 (H:V). All asphaltic materials within the pit will be removed and disposed of in an appropriate off-site location. The entry to the access road will be blocked and the road will be reshaped, reclaimed, and revegetated to blend with the surrounding topography. Topsoil and vegetative debris (termed "duff"), and fines will be applied to this landform. A native seed mixture will be incorporated into the site.

4.4.1 Slope Stability

Pit slopes for the mining phases and the final reclaimed site will not be steeper than 3:1 (H:V), or 18° , except for the minor road cuts which will be 1.75:1 (H:V), or 30° , and a maximum of 17 feet high. The angle of repose of the loose stockpile material on the site is approximately 32° . For the final 3:1 (H:V) pit slopes, a static factor of safety of 1.9 is calculated. Thus, pit slopes will be stable at the proposed angle under static conditions. However, depending on the conditions of the sediment exposed on the slope (moisture content, vegetation cover, compaction, etc.), portions of the pit slope could experience surficial failure due to seismic loading from a maximum credible earthquake on one of the active faults in the area. Any slope failures will be retained within the pit.

4.4.2 Final Drainage Plan and Impoundments

Map Sheet 4 details the final drainage plan of the reclaimed site. Each of sediment berms around the pit will remain in place and will be maintained throughout the life of the permit.

4.4.3 Disposition of Equipment

Any equipment brought onto the site will be removed from the site following termination of mining activity. No equipment will be stored permanently on-site. At final reclamation, there will be no equipment remaining on the mined site.

4.5.0 RESOILING

The native soil of this site is very sandy with a large amount of coarse fraction (gravel and larger) material on the surface. The topsoil also contains native seeds and soil microorganisms. While a portion of the topsoil (the large fraction) is part of the minerals being extracted from this site, the upper six inches will be treated as an invaluable resource and salvaged, rather than as a commodity and removed from the site.

The topsoil is therefore defined as the upper six inches of the native surface. Duff is defined as the topsoil and vegetative material. Prior to mining any area that has not been previously mined (the majority of the site), the top six inches of the native surface and all existing vegetative material will be scraped off the mining area and stored in the stockpile areas or windowed at the top of the excavation. The vegetation can be either harvested and stockpiled separately, scraped at the same time as the surface material and stockpiled together, or hydroxide, chopped, broken, or chipped and mixed into the topsoil. Any vegetative debris greater than 0.5-foot in any dimension will be stockpiled separately from the topsoil.

Fines salvaged from processing and sedimentation ponds will be used to augment the amount of growth media available for reclamation. It is estimated that approximately 3.7 acre-feet of processing fines will be available for resoiling. With an estimated 3.0 acres that have been previously disturbed, resoiling with fines will be required to be a minimum of six inches deep, but may be approximately one-foot deep.

Native surface materials will be stored in the stockpile areas or windowed at the top of the excavation area, and will be kept separate from processing and sedimentation pond fines. Native topsoils will be spread on the slopes first, with the remaining, if any, spread on the pit bottom. All other areas will receive processing and sedimentation fines. These fines will be stockpiled separately from topsoil and will be placed in the stockpile area delineated on the site plans.

Prior to spreading the growth media, all compacted areas will be decompact (ripped or disced) to facilitate root growth. The topsoil that was stockpiled or windowed on the side of the pit will then be respread to a depth of six inches over the disturbed slopes, and roughened to form a variety of microsites. This can be accomplished by rough grading, imprinting, or other suitable method. Reseeding will immediately follow the spreading and roughening of topsoil. Any woody debris that was stockpiled separately, will then be distributed over the site in a random manner.

The remaining areas will be resoiled with sedimentation and processing fines. Immediately following the spreading of these fines, the area will be roughened and reseeded.

4.6.0 REVEGETATION

Revegetation treatments of the site will strive to achieve visual integration with the surrounding vegetation and provide wildlife habitat values. Seeding of the site will take place during the fall, late October to December.

4.6.1 Seedbed Preparation

After respreading the topsoil, duff, or fines, the area will be roughened to form a variety of microsites; this can be accomplished by "track walking" the site or by imprinting. The growth media will be prepared to provide a firm, but not overly compacted seedbed.

4.6.2 Seed Sources, Mixtures and Rates

Many plant species are comprised of local ecotypes that are highly adapted to the local climate and edaphic conditions (Plummer et al. 1955, 1968). The plants that will have the best chance of survival on a site are those ecotypes that are growing on (or near) that site (Millar and Libby 1989). Besides the problem of purchasing a less adaptive ecotype, one could also cause genetic contamination of the local ecotype through interbreeding with an introduced ecotype. The best policy is to collect the material from on or near the site.

Therefore, plant materials for each of the specified species should be obtained from the same region as the mine site, with the property owners' permission. For the purposes of MS #300, the collection region will be defined as areas containing Desert Saltbush Scrub (Holland 1986) vegetation types that occur within the Owens Valley, between Olancha and Big Pine.

The following seed mix is proposed for use on all areas of this site. Changes to this seed mix will only be allowed with the concurrence of BLM.

TABLE 4.6-1: PROPOSED SEED MIX

SCIENTIFIC NAME	COMMON NAME	PERCENT PURITY (Min)	PERCENT GERMINATION (Min)	PLS POUNDS/AC
<i>Atriplex hymenelytra</i>	desert holly	80	40	7
<i>Kochia californica</i>	red molly	30	40	1
<i>Atriplex confertifolia</i>	shadscale	80	50	2
			TOTAL	10.0

Seeding rates are given in pounds of pure live seed (PLS) per acre and are based on the above listed percent purity and germination rates. Percent pure live seed can be calculated from commercial or custom collected seed by the following formula:

$$\text{PLS} = \frac{\% \text{ pure seed} \times \% \text{ germination}}{100}$$

If seed conforming to the requirements for purity or germination is not readily available, seed not conforming to these requirements may be used provided that the application rate for such seed is increased to compensate for the lower PLS. The seed application rate can be adjusted based on the preceding formula to compensate for germination or purity below or above that specified.

4.6.3 Seeding Methods

Over most of the site, the seed will be broadcast and then mixed into the top 1/2-inch of the substrate by either raking or dragging a chain across the seedbed, or other suitable method.

4.6.4 Soil Amendments and Mulches

The native vegetative debris will serve as a native mulch.

4.6.5 Irrigation

The species selections for this pit are native to the area and are saline, alkaline, and drought tolerant. However, many species tolerant to high levels of salt and alkali germinate only during very wet years when the salt/alkali content of the soil-water is significantly decreased. The use of irrigation on this site would probably aid germination; however, it would also serve to increase growth of weedy species, thereby increasing the competitive advantage of the weedy, exotic species, such as Russian thistle. Therefore, irrigation is not currently recommended for seeded areas on this site.

4.6.6 Plant Protection Measures

No protection will be provided for the seeded areas, except as a remedial measure. If predation by insects and animals impact the outcome of the seeded areas, individual shrubs will be caged as proposed in the remedial measures.

4.6.7 Plant Eradication Measures

If Russian thistle invades revegetated areas to the point that it is impacting the germination and/or growth of desired species, then this invasive exotic will be manually removed from the site as a remedial measure.

4.7.0 EROSION AND SEDIMENT CONTROL

Erosion and sediment control will be achieved by implementation of the previously described drainage and revegetation plans. Soil berms will be constructed in conformance to the drainage plan. Resoiling and reseeded will be performed according to the revegetation plan.

4.8.0 PUBLIC SAFETY

The configuration of the mined lands will not pose a hazard to the public. Hazardous materials associated with mining and processing will be stored properly on site; and prior to reclamation, will be disposed of properly off-site. The steep slopes of the wave-cut terraces, as well as other steep slopes both on- and off-site, are natural features.

4.9.0 PERFORMANCE STANDARDS

The following discussion sets forth minimum site criteria, or performance standards, for the various aspects of site reclamation. Monitoring of reclamation performance standards will be conducted by a qualified individual or group of individuals, agreed upon by Caltrans and Inyo County.

4.9.1 Erosion and Sediment Control

Erosion and sediment control monitoring will be completed at the same time and frequency that the vegetation monitoring is done. The results will be used to aid in identifying areas of potential failures and to require the use of remedial measures before problem areas cause widespread failures.

Sedimentation basins will be inspected following the season's first major storm event or at a minimum of annually. Basins will be cleaned out as needed to maintain a minimum storage capacity.

4.9.2 Slope Stability

With the exception of the minor road cuts, no large man-made slope shall be steeper than 3:1 (H:V), which has been determined to exceed the slope stability standard for this material for all except the most severe earthquake events.

4.9.3 Revegetation

Undisturbed site-indigenous shrub cover was estimated at eight percent for perennial species and one percent for annuals. All phases of reclamation will strive to achieve this standard.

4.10.0 MAINTENANCE, MONITORING, AND REMEDIAL MEASURES

Site maintenance and monitoring will continue until Inyo County deems reclamation complete.

4.10.1 Erosion and Sediment Control

All erosion and sediment control structures will be maintained and monitored for as long as mining and reclamation continues. This shall be done to ensure that the failure of one or more structures does not apply additional and unplanned stress on other structures.

If infilling or failure of a structure occurs, steps to repair the original structure will be taken. Infilled structures will be cleaned out.

4.10.2 Slope Stability

All slopes will be assessed, during annual monitoring to ensure that they are stable. If excess slope erosion is observed, or failures noted, the appropriate remedial measures will be implemented. All pit slopes will be no greater than 3:1 (H:V), except where minor road cuts occur.

4.10.3 Revegetation

Revegetation of the site will be monitored following implementation of each phase. Monitoring activities will take place during the peak flowering season, approximately April to May. Once the monitoring date is set, monitoring of the site during the later years will occur within two weeks of that original date. This scheme will assure that the data will be comparable over time.

Revegetation monitoring will consist of visual assessments and recording the progress of reclamation with photographs. The species composition, shrub cover, and shrub density will be recorded on a County Approved Form (an example is included in Appendix B).

If it appears that the site will not meet the performance standards, then the investigator shall suggest remedial measures. Appropriate remedial measures are listed in Table 4.10-1.

4.10.4 Visual

The cliffs northeast of the site will be monitored annually to ensure that the appearance and structure of the cliffs are not being affected by mining or reclamation activities. The cliffs should be visually similar to the surrounding landforms, with no evidence of erosion or failures caused by mining or reclamation activities.

4.11.0 REPORTING

Once the reclamation activities have been completed, monitoring activities will commence and will continue until the County is satisfied that performance standards have been met. Reporting of the progress of reclamation will be relayed to Inyo County on an annual basis. This annual report will, at a minimum, consist of the name and credentials of the investigator(s), a summary, the date of the visit(s), the methods and materials used, the data collected, an analysis of the data and performance standards, and any suggested remedial measures.

TABLE 4.10-1: REMEDIAL MEASURES

FEATURE	OBJECTIVES	MONITORING FREQ.	FINDINGS	ACTION
Wind Erosion	Soil stabilized, no nuisance dust from site.	Continuously during mining and reclamation implementation; annually following reclamation.	Soil drifts found behind plants and rises, blowing dust.	Consider additional soil stabilization, i.e., straw or rock mulching and revegetation.
Water Erosion	Soil stabilized, no evidence of rilling or gulying equal to or greater than a Class 3.	After first major storm event (>0.5 inch rain in a 24-hour period) following construction; once a year during annual monitoring of reclamation.	Rilling or gulying or erosion judged to be excessive.	Repair area, consider additional stabilization (waterbars, berms, diversion channels, rock lining, or mulches).
Slope Stability	No evidence of slope failures.	Monitor continuously during mining operations; and annually during reclamation.	Slope failures, slumping.	Reconstruct slope, lessen angle of slope, and implement erosion control measures.
Sedimentation	Little accumulation of sediment in basins (pit); basins maintain adequate capacity.	After first major storm event (>0.5 inch rain in a 24-year period) following construction; annually during reclamation.	Sedimentation basins filling up; diminished capacity.	Clean out basin; analyze watershed for source of sediment; implement erosion control measures to correct problem.
Invasion by Russian thistle or other invasive exotics	No interference with establishment of native vegetation.	Once per year, note areas of infestation of Russian Thistle or other species.	Infestation of exotics interfering with establishment of native vegetation.	Apply weed eradication measures: hand-pulling, hand-cutting, and possibly hand-applied herbicide.
Revegetation	Perennial density averages 8%. Annual density averages 1%.	Annually following implementation.	Significantly below objectives.	Consider reseeding; analyze soil for problems; analyze for pest problems (consider fencing individual plants).
Resoiling	Decompacted native soils or fines respread to a depth of 6 inches.	Monitor during implementation.	Fines absent from substrate surface or a compacted substrate.	Respread additional fines; rip or disc site to alleviate compaction.

5.0.0 COST OF RECLAMATION

A reclamation cost estimate is provided on Page 7 of Appendix A.

6.0.0 APPLICANT STATEMENT OF RESPONSIBILITY

An Applicant Statement of responsibility can be found on Page 10 of Appendix A.

7.0.0 REFERENCES

Barbour, M.G. and J. Major, eds. 1988. Terrestrial Vegetation of California. California Native Plant Society Special Publication Number 9.

Blankenship, T. 1986. Inyo-White Mountain Deer Herd Management Plan. California Department of Fish and Game, U.S. Forest Service, U.S. Bureau of Land Management.

California Department of Fish and Game (CDFG). 1986. Owens Valley Tule Elk Habitat Management Plan. California Department of Fish and Game, Region 5, Wildlife Management, Bishop.

California Department of Fish and Game (CDFG). 1989. Memorandum on status of populations of bighorn sheep in California.

California Natural Diversity Data Base (CNDDDB). 1991. List of special animals (revised August 1991). California Natural Heritage Division, California Department of Fish and Game, Sacramento.

California Natural Diversity Data Base (CNDDDB). 1992. "Rarefind" computer printout for the Keeler, California 7.5-minute quad. California Natural Heritage Division, California Department of Fish and Game, Sacramento. December 23, 1992 edition.

Carver, G.A. 1970. Quaternary Tectonism and Surface Faulting in the Owens Lake Basin, California. University of Nevada, Reno, Mackay School of Mines Technical Report AT-2.

Dixon, R.M. 1990. Air-earth interface model for ecosystem restoration and maintenance. Pages 172-181 in *Proceeding of the Fourth Annual Conference of the Society for Ecological Restoration*, Oakland, California, January 16-20, 1989.

El-Ghonemy, A.A., A. Wallace, and E.M. Romney. 1980. Socioecological and soil-plant studies of the natural vegetation in the northern Mojave Desert-Great Basin interface. *Great Basin Naturalist Memoirs* 4:71-86.

Goldman, S.J., K. Jackson, and T.A. Bursztynsky. 1986. *Erosion and Sediment Control Handbook*. McGraw-Hill Book Company; New York.

Holland, R.F. 1986. Preliminary descriptions of the Terrestrial Natural Communities of California. Department of Fish and Game Report.

Jaeger, E.G. 1969. *Desert Wild Flowers*. Stanford University Press, Stanford California.

Jennings, C.W. 1992. Preliminary Fault Activity Map of California. California Division of Mines and Geology Open-File Report 92-03 (Scale 1:750,000).

Joyner, W.B. and D.M. Boore. 1982. Measurement, Characterization, and Prediction of Strong Ground Motion in *Earthquake Engineering and Soil Dynamics II - Recent Advances in Ground-Motion Evaluation*, ASCE Geotechnical Special Publication No. 20 (pages 43-102).

Kay, B.L. 1979. Summary of revegetation attempts on the second LA Aqueduct. U.C. Davis Agronomy and Range Service Mojave Revegetation Notes, No. 22.

Kay, B.L., Graves, W.L., and J.A. Young. 1988. Long-term storage of desert shrub seed. Mojave Revegetation Notes, UC Davis Agronomy and Range Science No. 23.

Laudenslayer, W.F., W.E. Grenfell, Jr., and D.C. Zeiner. 1991. A check-list of the amphibians, reptiles, birds, and mammals of California. California Fish and Game 77(3): 109-141.

Lee, W.T. 1906. Geology and Water Resources of Owens Valley, California. U.S. Geological Survey Water-Supply Paper 181.

MacMahon, J.A. 1992. The Audubon Society Nature Guides. Deserts. Alfred A. Knopf, Inc., New York, 638 pp.

Millar, C. I., and W. J. Libby. 1989. Disneyland or native ecosystem: genetics and the restorationist. Rest. & Mgmt. Notes 7 (1): 18-24.

Moon, B. 1990. Personal communication with Gail Newton

Mueller-Dombois, D. and H. Ellenberg. 1974. Aims and Methods of Vegetation Ecology. John Wiley & Sons, Inc., NY, NY.

Munz, P. 1959. A California Flora. University of California Press, Berkeley, California.

Munz, P. 1968. Supplement to A California Flora. University of California Press, Berkeley, California.

Nelson, J.R. 1988. Rare plant field survey guidelines Pages iii-iv In Inventory of Rare and Endangered Vascular Plants of California. California Native Plant Society, Special Publication No. 1, Fourth Edition.

Oakshott, G.B., R.W. Greensfelder, and J.E. Kahle. 1972. 1872 - 1972 . . . One-hundred Years Later (1872 Owens Valley Earthquake). California Geology March 1972 (pages 55-61).

Plummer, A.P., A.C. Hull, Jr., G. Stewart, and J.H. Robertson. 1955. Seeding rangelands in Utah, Nevada, southern Idaho, and western Wyoming. USDA Handbook 71.

Plummer, A.P., D.R. Christenson, and S.B. Monsen. 1968. Restoring big game range in Utah. Utah Division of Fish and Game, Pub. 68-3.

Racine, D., T. Blankenship, D. Koch. 1988. Owens Valley Tule Elk Management Unit Management Plan. Summary and Supplement to the Owens Valley Tule Elk Management Plan. California Department of Fish and Game, Bishop. 48 pp.

St. John, Ted. 1993. Personal communication with Gail Newton.

State of California, Department of Water Resources (DWR). 1976. Bulletin 195.

Stinson, M.C. 1977. Geology of the Keeler 15' Quadrangle, Inyo County, California. California Division of Mines and Geology Map Sheet 38 (Scale 1:62,500).

Thompson, T.H., J. Nuter, W.R. Moyle, Jr., and L.R. Woolfenden. 1984. Maps Showing Distribution of Dissolved Solids and Dominant Chemical Type in Ground Water, Basin and Range Province, Southern California. U.S. Geological Survey Water-Resources Investigations Report 83-4116-C.

U. S. Department of Agriculture, Soil Conservation Service (USDA-SCS). 1986. Urban Hydrology for Small Watersheds. SCS Technical Release (TR) 55.

U. S. Department of Interior, Bureau of Land Management (USDI-BLM). 1983. Soil Inventory of Benton-Owens Valley Area, Inyo and Mono Counties, California. BLM Bishop Office.

U.S. Department of Interior, Bureau of Land Management (BLM). 1991. Bishop Resource Management Plan and Environmental Impact Statement. Bishop Office.

Vaughn, D.E. 1980. Soil inventory of the Benton-Owens Valley area, Inyo and Mono Counties, California. U.S. Department of the Interior, Bureau of Land Management.

Webb, R.H., J.W. Steiger, and E.B. Newman. 1988. The response of vegetation to disturbance in Death Valley National Monument, California. US Geological Survey Bullentin, 1793.

Zedler, P.H. and T.H. Ebert. 1977. Shrub seedling establishment and survival following an unusual September rain in the Colorado Desert. Bulletin Ecological Society of America, 58:47.

Zeiner, D.C., W.F. Laudenslayer, Jr., and K.E. Mayer, Eds. 1988. California's Wildlife, vol. 1-3. California Department of Fish and Game, Sacramento.

**APPENDIX A
COUNTY OF INYO
MINING RECLAMATION PLAN APPLICATION**

PLEASE PRINT OR TYPE INFORMATION DATE 10-30-95 USE ADDITIONAL SHEETS IF NECESSARY

This application is for a: (check the appropriate box(es))

<input type="checkbox"/> Mining Operation	<input checked="" type="checkbox"/> Sand/Gravel Pit	<input checked="" type="checkbox"/> Screening Plant
<input type="checkbox"/> Milling Operation	<input type="checkbox"/> Concrete Batch Plant	<input type="checkbox"/> Asphalt Batch Plant
<input type="checkbox"/> Exploration	<input type="checkbox"/> Other (describe)	

1. APPLICANT

Name: California Dept. of Transportation (Caltrans) Phone: (619) 872-5204

Address: 500 South Main Street

City: Bishop State: California Zip: 93514

2. REPRESENTATIVE

Name: Luis Elias Phone: (619) 872-5204

Caltrans District 09

Address: 500 South Main Street

City: Bishop State: California Zip: 93514

3. LANDOWNER

Name: U.S. Dept. of Interior, Bureau of Land Mgmt. (BLM) Phone: (619) 384-5400

Address: 300 S. Richmond Road

City: Ridgecrest State: California Zip: 93555

4. OPERATOR

Name: California Dept. of Transportation (Caltrans) Phone: (619) 872-5204

Address: 500 S. Main Street

City: Bishop State: California Zip: 93514

5. LESSEE

Name: California Dept. of Transportation (Caltrans) Phone: (619) 872-5204

Address: 500 S. Main Street

City: Bishop State: California Zip: 93514

6. ASSESSOR'S PARCEL NO(S): 31-010-19

Section(s): E1/2 of Section 15 Township(s): 17S Range(s): 38E

Latitude: 36° 27' 30"N

Longitude: 117° 0' 30"W

7. CLAIM DESCRIPTION(S)	Name	TYPE	RECORDED		BLM ID #
		(lode,placer,millsite)	VOL	PG	
	State Material Site #300 or Keeler Pit	Borrow Pit (Placer)			

8. GEOLOGY

Describe the geologic setting of the area with a more detailed geologic description of the mineral deposit to be mined and principle minerals or rock types present. If referenced in a geologic report please attach a copy.

See Section 2.3.0

9. ENVIRONMENT

Give a description of the environmental setting of the site and the surrounding areas.

Describe existing land use, topography, vegetation, wildlife, ground water and surface water characteristics, average rain fall and other factors pertaining to the environment.

See Section 2.0.0

10. MINING OPERATION

A. Proposed Starting Date: Originally permitted in 1984, restart 1995

B. Name of Mine or Project: State Material Site #300 or Keeler Pit

C. Minerals to be Mined: Sand and gravel

D. Maximum Total Yearly Production: ORE: 39,000 yd³ WASTE: 1,000 yd³ TOTAL: 40,000 yd³

E. Estimated Mine Life: 30 yrs Estimated Time to Complete Reclamation: 40 yrs

F. Operation is: Continuous Intermittent: X Seasonal:

G. Operation is: New Site In Operation: Inactive: X

H. Days per Week: 5 Daily Operation Hours: 7am to 5pm Starting Time: 7am

I. Estimated Number of Employees: 2-3 Number of Shifts Per Day: 1

J. Type of Housing (if needed): None

11. MINE DIMENSIONS

Highest Elevation: 3850' Overall Slope: Angle 3°

Maximum Depth: 40' Maximum Slope Angle: 3:1 (H:V)

Maximum Length: 700' Maximum Width: 300'

Angle of Repose for Native or Host Material: 32°

Bench Height: Bench Width:

12. SIZE OF OPERATION (in Acres)

Owned _____	Leased _____	100 (mine only 4.8) _____
Patented _____	Sub-leased _____	
Unpatented 100 _____	Other _____	
Total Acres: 100 _____	To be Reclaimed: _____	4.8 _____

13. MINE WASTE (See Map Sheets for phases)
 Describe waste piles, stockpiles, tailings ponds, other ponds, and leach pads.
 Answer for EACH pile, pond or pad where appropriate.

Highest Elevation: 3800' Overall Slope Angle: 3:1 (H:V)

Maximum Height: 15' Surface Area of Ponds: 1.3 acres

Maximum Length: 200' Depth of Ponds: 20'

Maximum Width: 70'

14. TYPE OF OPERATION

Open Pit	Single Bench
Borrow Pit _____ X	Multibench
Gravel/Sand Pit _____ X	Underground
Clay Pit	Hardrock
Hill Top	Waste Dump
Side Hill	Tailings Pond
Shovel/Truck	Quarry
Dragline	Other (describe)

15. OTHER CONSTRUCTION

Access Roads	Plant Site (portable)
Asphalt Batch Plant (port)	Screening (portable) _____ X
Bathroom (Dry)	Settling Ponds
Blasting	Sheds
Concrete Batch Plant	Shops
Conveyors	Stockpiles _____ X
Crushers (portable)	Tailings Dams
Explosive Storage	Tanks (asphalt & diesel)
Office Site (portable)	Water Wells
On-Site Living	Waste Dumps
Sewage Disposal	Other (describe)

16.	PROCESSING	<p>A. Check Box(es) that Describe Operation:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">Crushing (portable)</td> <td style="width: 50%;">Amalgamation</td> </tr> <tr> <td>Milling</td> <td>Concrete Batch</td> </tr> <tr> <td>Washing <input checked="" type="checkbox"/></td> <td>Asphalt Batch (portable)</td> </tr> <tr> <td>Flotation</td> <td>Precipitate</td> </tr> <tr> <td>Heap Leaching</td> <td>Hand Sort</td> </tr> <tr> <td>Sizing</td> <td>Smelting</td> </tr> <tr> <td>Other (describe)</td> <td>Temporary Screening Plant (portable) <input checked="" type="checkbox"/></td> </tr> </table> <p>B. List Chemicals Used in the Processing</p> <p>none</p>		Crushing (portable)	Amalgamation	Milling	Concrete Batch	Washing <input checked="" type="checkbox"/>	Asphalt Batch (portable)	Flotation	Precipitate	Heap Leaching	Hand Sort	Sizing	Smelting	Other (describe)	Temporary Screening Plant (portable) <input checked="" type="checkbox"/>
Crushing (portable)	Amalgamation																
Milling	Concrete Batch																
Washing <input checked="" type="checkbox"/>	Asphalt Batch (portable)																
Flotation	Precipitate																
Heap Leaching	Hand Sort																
Sizing	Smelting																
Other (describe)	Temporary Screening Plant (portable) <input checked="" type="checkbox"/>																
17.	ACCESS	<p>Describe existing routes to the operation site. Entrance road at PM 15.5 on Highway 136</p> <p>Describe any proposed new access roads to be constructed. None</p> <p>See Section 1.5.0</p>															
18.	AIR QUALITY	<p>List Number and Types of Vehicles and Equipment Associated with the Project:</p> <p>See Section 3.8.0</p>															
19.	WATER QUALITY/SUPPLY:	See Section 3.6.0															
	Source of Fresh Water	Water truck, Keeler or Lone Pine															
	Gallons per Day Fresh	During screening = 2,000 gallons/day															
	Gallons per Day Recycled	None															
	Total Gallons Used per Day	2,000 gallons/day															
	Chemicals Used	None															
	Method of Chemical Disposal	None															
	Proposed Sewage System	Portable toilets, Commercial Vendor															
20.	ENERGY:	See Section 3.7.0															
	To be Consumed by the Project/Month																
	ELECTRICITY	Diesel Generator (see below)															
	NATURAL GAS	None															
	OTHER FUELS (type)	Diesel, average 40 gallons per month															

21.

Describe the site alterations that will be produced by your proposed project. For instance, describe topographic changes, storm flows that will have to be channelized, lengths of new roads and/or easements and other such changes:

See Section 3.0

22.

If your project requires any permits from other agencies, please identify the agency and type of permits. Some of the Agencies or department that you may have to obtain permits from are listed below:

- Great Basin Unified Air Pollution Control District
- Lahontan Regional Water Quality Control Board
- County Environmental Health Department
- County Building and Safety Department
- County Road Department
- Bureau of Land Management Mining Permit
- California Department of Fish and Game
- Inyo National Forest
- Inyo County Reclamation Plan Approval

23.

HAZARDOUS WASTES; AIR QUALITY; AND HAZARDOUS MATERIALS

Pursuant to Section 65962.5(e) of the California Government Code the project site is _____

is not identified on the latest list prepared by the Secretary of Environmental Affairs as a hazardous waste site.

Pursuant to Section 65850.2(a)(1) of the California Government Code the applicant will _____

will not need to comply with Sections 25505, 25533, and 25534 of the California Health and Safety Code requiring a hazardous material business plan; hazardous materials registration forms; and the preparation of a Risk Management and Prevention Program (RMPP), respectively, and the requirements for a permit for construction or modification from the Great Basin Unified Air Pollution Control District.

Pursuant to Section 65850.2(a)(2) of the California Government Code the applicant will _____

will not handle acutely hazardous materials as defined by Section 25500 et. seq. of the California Health and Safety Code. If "will" is checked then a notice of requirement to comply with or determination of exemption for a Risk Management and Prevention Program (RMPP) from the Inyo County Environmental Health Department shall be attached to this application pursuant to Section 65850.2(b) of the California Government Code.

Pursuant to Section 65850.2(b) of the California Government code the applicant shall attach certification from the Great Basin Unified Air Pollution Control District that the project is in compliance with any disclosures required by Section 42303 of the California Health and Safety Code concerning information needed by them to determine air pollution resulting from the project.

24. PROPOSED OR POTENTIAL USE OF THE LAND AFTER RECLAMATION

See Section 4.0.0:

25. METHODS OF RECLAMATION: See Section 4.0.0

Backfilling	_____	Rehabilitation of drainage	_____X
Stabilization of slopes	_____X	Equipment and refuse removal	_____X
Resoiling and revegetation	_____X	Mitigate Hazards	_____
Soil Augmentation	_____	Other (describe)	_____

26. TIMING OF RECLAMATION

Check One

_____X Mining and Reclamation is done simultaneously.

_____ Reclamation will be done after mining complete.

State sequence of mining and reclamation.

See Section 3.0.0

27. RECLAMATION COST ESTIMATE SUMMARY SHEET MINING AND MILLING OPERATIONS

Section 2773.1 of the Surface Mining and Reclamation Act (SMARA) requires that financial assurance be established for each surface mining operation to ensure reclamation is performed in accordance with the surface mining operation's approved reclamation plan. The assurance is to be reviewed on an annual basis to account for new lands disturbed, inflation, and reclamation of lands completed in accordance with the approved reclamation plan.

Please provide an estimate of the actual cost of reclamation of your operation based on existing and/or anticipated disturbance resulting from your operation. This estimate should show a detailed break-down of cost to include, but not be limited to the following items:

A. Earthwork/Recontouring

	Manpower ¹	Equipment	Materials
1. Roads	\$95.39	\$251.99	\$0
2. Pits, Adits/Trenches	\$128.38	\$212.55	\$0
3. Process Ponds	\$0	\$0	\$0
4. Heaps	\$157.79	\$376.32	\$0
5. Dumps (waste + landfills)	\$0	\$0	\$0
6. Tailings	\$0	\$0	\$0
7. Buildings and Equipment	\$0	\$0	\$0
8. Drainage Control Plan	\$909.99	\$898.07	\$440.00
9. Misc. (remove fence)	\$301.44	\$73.20	\$500.00
Subtotal	\$1,592.99	\$1,812.13	\$940.00

B. Revegetation/Stabilization

1. Roads	\$0	\$0	\$0
2. Pits, Adits/Trenches	\$1,750.00	\$540.00	\$1,290.00
3. Process Ponds	\$0	\$0	\$0
4. Heaps	\$0	\$0	\$0
5. Dumps (waste + landfills)	\$0	\$0	\$0
6. Tailings	\$0	\$0	\$0
7. Buildings and Equipment	\$0	\$0	\$0
8. Drainage Control Plan	\$377.42	\$139.86	\$150.00
9. Misc. (describe)	\$0	\$0	\$0
10. Monitoring (post reclamation)	\$0	\$0	\$0
Subtotal	\$2,127.42	\$679.86	\$1,440.00

¹County construction cost must use California prevailing wage law. Wage rates must include FICA, and other required coverage and benefits covering your work force.

27. RECLAMATION COST ESTIMATE SUMMARY SHEET MINING AND MILLING OPERATIONS (cont)

C. Detoxification/Disposal of Wastes

	Manpower ¹	Equipment	Materials
1. Process Ponds	\$0	\$0	\$0
2. Heaps	\$0	\$0	\$0
3. Dumps (waste + landfills)	\$0	\$0	\$0
4. Tailings	\$0	\$0	\$0
5. Drainage Control Plan	\$0	\$0	\$0
6. Misc. (describe)	\$0	\$0	\$0
7. Monitoring (post reclamation)	\$300.00	\$256.00	\$0
Subtotal	\$300.00	\$256.00	\$0

D. Removal

1. Structures	\$0	\$0	\$0
2. Equipment	\$0	\$0	\$0
3. Facilities	\$0	\$0	\$0
Subtotal	\$0	\$0	\$0

E. Insurance (on site liability (1.5%))	\$137.23
F. Contract Administration (15%)	\$1,372.26
G. Bond (performance & payment) (1.5%)	\$137.23
H. Profit (10%)	\$914.84

I. Grand Total	\$11,709.96
J. Remarks	

* All reclamation costs are to be calculated as third party contracts (the County will put the reclamation contracts out to bid in case of operator default). If you seek a bond reduction based upon your own "in house" equipment and personnel, submit a second cost analysis and a written request for the reduction to the County.

28. TYPE OF FINANCIAL ASSURANCE (check one):

- Surety Bond
- Irrevocable Letter of Credit
- Trust Funds (Cash)
- California Department of Transportation-Budget Set Aside

29. RECLAMATION COST ESTIMATE FOR EXPLORATION OPERATIONS

A. Earthwork/Recontouring

	Manpower	Equipment	Materials
Roads	\$ _____	\$ _____	\$ _____
2. Drill Pads	\$ _____	\$ _____	\$ _____
3. Trenches	\$ _____	\$ _____	\$ _____
Subtotal	\$ _____	\$ _____	\$ _____

B. Revegetation/Stabilization

1. Roads	\$ _____	\$ _____	\$ _____
2. Drill Pads	\$ _____	\$ _____	\$ _____
3. Trenches	\$ _____	\$ _____	\$ _____
4. Monitoring (if required) (post reclamation)	\$ _____	\$ _____	\$ _____
Subtotal	\$ _____	\$ _____	\$ _____

C. Insurance (on site liability) (1.5%) \$ _____

D. Contract Administration (15%) \$ _____

E. Bond (performance & payment) (1.5%) \$ _____

F. Profit (10%) \$ _____

G. Total \$ _____

H. Grand Total \$ _____

Remarks

All reclamation costs are to be calculated as third party contracts (the County will put the reclamation contracts out to bid in case of operator default). If you seek a bond reduction based upon your own "in house" equipment and personnel, submit a second cost analysis and a written request for the reduction to the County.

30. TYPE OF FINANCIAL ASSURANCE (check one):

_____ Surety Bond

_____ Irrevocable Letter of Credit

_____ Trust Funds (Cash)

X Not Applicable

31. NOTIFICATION OF RESPONSIBILITY

I, The SMARA Coordinator, the undersigned representing (the) California Dept. of Transportation,

(state agency) legal holder of the possessory interest, mineral and/or surface rights

to the property commonly known as the Material Site #300 located in Township 17S

Range 38E Section(s) 15 (MDBM), do hereby acknowledge to abide by the

Reclamation Plan as submitted with the application.



Luis Elias, SMARA Coordinator

October 30, 1995

Date

Individual Acknowledgment

Corporation Acknowledgment

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

No. 5907

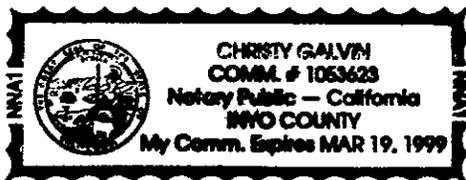
State of California

County of Inyo

On Oct. 30, 1995 before me, Christy Galvin, Notary Public
DATE NAME, TITLE OF OFFICER - E.G., "JANE DOE, NOTARY PUBLIC"

personally appeared Guis Elias
NAME(S) OF SIGNER(S)

personally known to me - **OR** - proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



WITNESS my hand and official seal.

Christy Galvin
SIGNATURE OF NOTARY

OPTIONAL

Though the data below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent reattachment of this form.

CAPACITY CLAIMED BY SIGNER

- INDIVIDUAL
- CORPORATE OFFICER

TITLE(S)

- PARTNER(S) LIMITED
- ATTORNEY-IN-FACT GENERAL
- TRUSTEE(S)
- GUARDIAN/CONSERVATOR
- OTHER: _____

DESCRIPTION OF ATTACHED DOCUMENT

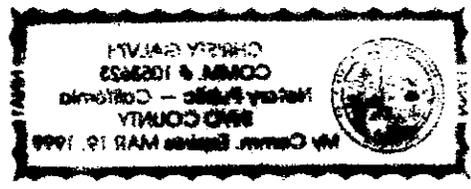
Reclamation Plan
TITLE OR TYPE OF DOCUMENT

37 pages plus attachment
NUMBER OF PAGES

10/30/95
DATE OF DOCUMENT

SIGNER IS REPRESENTING:
NAME OF PERSON(S) OR ENTITY(IES)

SIGNER(S) OTHER THAN NAMED ABOVE



32. APPLICANTS CERTIFICATION OF FILING: (Legal owner of the property must sign)

NOTE: If more than one person is involved in the ownership of the property or mineral rights a separate page must be attached to this application which lists the names and addresses of all persons having interest in the ownership of the property or mineral rights.

All applicants for surface mining permits who are not also the recorded owner(s) of the property must submit a signed statement by the property/mineral rights owner(s) authorizing them to act on their behalf.

I certify under penalty of perjury that I am the owner of record, or as noted below and the owner of record has knowledge of and consents to the proposed surface mining reclamation plan application for this property. I further certify that the information contained is true and correct to the best of my knowledge.

_____ Owner or Possessory Interest or Mineral Rights

_____ Legal Owner(s) (all individual owners must sign as their names appear on the deed to the land)

_____ Corporate Officer(s) empowered to sign for the Corporation.

_____ Owner's legal Agent having Power of Attorney for this action (a Certified Power of Attorney document must accompany the application form).

Date 11/7/95

Lee Delaney
Signature

Lee Delaney
Print Name

Bureau of Land Management
Company

Individual Acknowledgment

Corporation Acknowledgment

U. S. Department of the Interior, Bureau of Land Management

NOTE:

THIS APPLICATION REQUIRES A PUBLIC HEARING BEFORE THE INYO COUNTY PLANNING COMMISSION. YOU OR A REPRESENTATIVE MUST BE PRESENT TO ANSWER ANY QUESTIONS. FAILURE TO APPEAR MAY RESULT IN THE PUBLIC HEARING BEING CONTINUED OR THE APPLICATION DENIED.

APPENDIX B

REVEGETATION MONITORING, SAMPLE DATA SHEET

Name _____ Date _____ Site # _____
Plot Size _____ Plot Number _____ Photo # _____
Treatment Received (i.e., type of mulch, resoiled?) _____

Plot Data: Total Plant Cover _____ Percent Bare Ground _____
Percent Litter _____ Percent Exposed Gravel or Cobble _____

Taxa:

Shrubs	Percent Cover	Number (density)	Height/Vigor

Herbs	Percent Cover	Number (density)	Height/Vigor

Notes:

APPENDIX C

INTERIM MANAGEMENT PLAN (IMP)

RESPONSIBLE PERSON/PARTY:

Luis Elias, Senior Transportation Engineer
California State Department of Transportation (Caltrans)
District 09
500 S. Main Street
Bishop, California 93514
(619) 872-5204

SUMMARY

The purpose of an Interim Management Plan (IMP) is to prevent or minimize adverse environmental effects from an idle mining operation and to ensure that residual hazards to the public health and safety are eliminated while the mine is idle.

Idle Plan

The mining operation is carefully designed such that an idle period can be easily integrated into the site's management. The erosion control and drainage plan for the initial site reclamation phase and mining phase will also serve to protect the site during idle periods. Within 90 days of this operation becoming idle, Caltrans shall contact Inyo County requesting initiation of an idle period of up to five years in duration. If Caltrans plans to extract or transport minerals from the site during an idle period (which may not exceed 10 percent of the operation's previous maximum annual mineral production), the following information will be transmitted with the request for idle status:

- A description of any equipment, structures, and other facilities that will remain on-site while the operation is idle.
- The estimated annual production of overburden, mining waste, and ore while the operation is idle.
- A description of surface mining operations that will be conducted while the operation is idle.

Upon the County's approval of idle status, the following annual monitoring activities will be implemented:

- verification that all erosion control and drainage control structures have been installed for the initial site reclamation phase and the mining phase, as per Section 3.0 of the reclamation plan;
- cleaning out of sediment basins, run-off retention areas, straw check dams, and ditches;
- clearing out of the up-gradient sides of the soil berms;
- maintenance of emplaced fill and fill slopes on site;
- maintenance and management of stockpiles; and,
- appropriate, off-site disposal of any illegally dumped materials found on the site.