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

Phone: (760) 878-0263
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E-Mail: inyoplanning@inyocounty.us

AGENDA ITEM NO.: **12** (Action Item – Public Hearing)

PLANNING COMMISSION MEETING DATE: January 27, 2021

SUBJECT: Amendment to Reclamation Plan 96-12/Keeler – MS#300 California Department of Transportation (Caltrans).

EXECUTIVE SUMMARY

The applicant has applied for an amendment to Reclamation Plan 96-12. The project proposes expanding mining operations at Keeler Pit MS #300 for continued maintenance of dirt shoulders in Inyo County. Approximately 300,000 cubic yards of material will be extracted from the site over a 30 to 50-year span in an 8.1 acre-expansion area. Mining will occur in 4 phases, entailing the creation of a dirt access road and a material extraction pit east and southeast of the existing pit. Four to six inches of topsoil will be relocated to soil berms on the north, south and east edges of the pit. The pit will be graded to ensure storm water containment (final slope configuration 3:1 or flatter). All equipment storage and operations will occur within the limits of the existing (lower) pit. A retention basin, to manage and contain all storm water, will be constructed in the lower pit. This aggregate pit is located on BLM land near Owens Lake in Inyo County with Tax Assessor Parcel Number 031-010-19. Caltrans' Current Reclamation plan allows for 4.8 acres with an estimated 120,000 cubic yards of material extraction. It was adopted in July 1997.

PROJECT INFORMATION

Supervisory District: 5

Applicants: California Department of Transportation (Caltrans).

Property Owner: Caltrans Highway Easement Deed allows for the mining and is owned by Bureau of Land Management (BLM)

Address/Community: Highway 136 at post-mile marker 15.5. The pit is approximately 3.5 miles southeast of the town of Keeler. California State Department of Transportation -District 9(CALTRANS) 500 S. Main St. Bishop, Ca 93514

A.P.N.: 031-010-19

General Plan: State and Federal Lands (SFL)

Zoning: Open Space (OS)

Surrounding Land Use:

Location:	**Use:**	**Gen. Plan Designation**	**Zoning**
Site	Mine	State And Federal Land (SFL)	Open Space with a 40 Acre minimum (OS-40)
North	Vacant Public Land	State And Federal Land (SFL)	Open Space with a 40 Acre minimum (OS-40)
East	Vacant Public Land	State And Federal Land (SFL)	Open Space with a 40 Acre minimum (OS-40)
South	Vacant Public Land	State And Federal Land (SFL)	Open Space with a 40 Acre minimum (OS-40)
West	Vacant Land	Natural resources (NR)	Open Space with a 40 Acre minimum (OS-40)

Recommended Action:

1.) Certify the Mitigated Negative Declaration of Environmental Impact pursuant to the California Environmental Quality Act, prepared for Amendment to Reclamation Plan 96-12/Keeler –MS#300 California Department of Transportation (Caltrans).
2.) Make certain Findings with respect to, and approve, Amendment to Reclamation Plan 96-12/Keeler – MS#300 California Department of Transportation (Caltrans).

Alternatives:

1.) Deny Amendment to Reclamation Plan 96-12/Keeler – MS#300 Caltrans, thereby not allowing the applicant to update its Reclamation Plan, or move forward with the proposed expansion.

2.) Continue the public hearing to a future date, providing specific direction to staff regarding what additional information and analysis is needed.

Project Planner: Ryan Standridge, Associate Planner

STAFF ANALYSIS

Background and Overview

Project Description

Inyo County Planning Commission approved Reclamation Plan 96-12 Keeler – MS#300 California Department of Transportation in July 1997. The material site was developed by Caltrans as a source of sand and gravel for road maintenance that includes 4.8 acres, with an estimated 120,000 cubic yards material extraction. The material is running low on the site and Caltrans is proposing expanding the mining operations. The proposed expansion will increase the amount of material to be extracted from the site to 300,000 cubic yards, over a 30 to 50-year span, in an 8.1 acre-expansion area. Quaternary alluvial deposits will be the source of sand and gravel. Generally, the material being mined will vary in texture from clayey gravel with sand to poorly graded sand with gravel. Mining will begin northeast of the old pit area and will be completed to a depth no greater than 50 feet. Mining will occur in 4 phases, entailing the creation of a dirt access road and a material extraction pit east and southeast of the existing pit. Four to six inches of topsoil will be relocated to soil berms on the north, south and east edges of the pit. The pit will be graded to ensure storm water containment and a retention basin will be constructed, to manage and contain all storm water. The lower pit will be the operations area for the remainder of the mining activities at the site. Material will be stockpiled, screened, and mixed within the operations area indicated on (Attachment 2). Slopes within the pit will be no steeper than 3:1 (H:V), except for minor cuts where access roads will enter the pit. These road cuts will be gravel, mulched immediately following construction, to minimize erosion. The following setbacks will be maintained during all phases of mining: 300 feet from the highway; 30 foot minimum from the bluffs associated with the two large drainage channels; and, a 30 foot minimum from the edge of the BLM easement. The proposed expansion is substantial which makes this update necessary per the County's Surface Mining and Land Reclamation Ordinance and requires approval by the Planning Commission.

Inyo County Code

Surface Mining and Land Reclamation in Inyo County is governed by Chapter 7.70 of the Inyo County Code which incorporates California's Surface Mining and Reclamation Act of 1975("SMARA", Public Resource Code Section [PRC] 271 et seq. and California Code of Regulations Section 3500 et seq.) The County is the "lead agency"(ref. PRC Section 2728) with

State Mining and Geology Board-certified surface mining and reclamation Ordinance (ref. PRC Section 2774.)

Planning Staff received a comment Letter from the California Department of Mine Reclamation, dated July 27, 2020, in response to the County's request for review of the Mine Reclamation Plan (Attachment 3). DMR staff commented on CCR Section 3503(b) by stating it requires that "Test plots be conducted simultaneously with mining…to ensure successful implementation of the revegetation plan". Caltrans conducted flora surveys on 8/18/2020 to gather data on species richness. The surveys were conducted with a sample set of 50-meter belt transects, one performed in each of the three (undisturbed) newly proposed mining phase areas, and one in a revegetated test plot area, for a total of four transects.

DMR staff also commented on the success criteria being 0.16 percent vegetative cover, but given the sparseness of the vegetative area, it is unclear if it is a quantitative measure of density. The Reclamation Plan was modified to address species richness by adding a table(2.6.1), and the reclamation plan as presented meets SMARA and Inyo County code requirements.

General Plan Consistency

The proposed project is consistent with the County General Plan designation of 'State and Federal Land' (SFL) as the SFL designation allows for Mining uses, under the approval of Bureau of Land Management (BLM) and accompanied by a reclamation plan (REC) approved by Inyo County under a Memorandum of Understanding with the BLM. The County approved the original (REC 96-12) in July 1997 with mining and excavation restricted to an excavation area of approximately 4.8- acres within an overall 84.18-acre parcel. Section 08.4.4 of the General Plan Goals and Policies states: 'protect the current and future extraction of mineral resources that are important to the County's economy while minimizing impacts on the public and the environment'. Caltrans mining currently plays a role in the County's maintenance of highway roads with local production of shale, sand and gravel crushed and screened to various sizes depending on product demand.

Zoning Ordinance Consistency

The proposed project is consistent with the County Zoning Ordinance designation of Open Space (OS) as the OS designation allows mining uses, as a conditional use, or when managed by the Bureau of Land Management with an approved plan of operations. These uses include Mining and processing of natural resources, including borrow pits. The proposed amendment consists of expanding the existing pit that is a continued mining use.

ENVIRONMENTAL REVIEW

Staff prepared a Draft Mitigated Negative Declaration and Initial Study for Amendment to Reclamation Plan 96-12/Keeler –MS#300 California Department of Transportation (Caltrans) and circulated it for a 30-day review and comment (Attachment 4). The review period closed on October 1, 2020.The Initial Study identified several potentially significant impacts: aesthetics, air quality, biological. The applicant provided information addressing these potential impacts and mitigation measures were developed to reduce the potential impacts to a level of insignificance and are included as conditions of approval for the project.

Aesthetics

- The proposed projects location is adjacent to State Scenic Highway-136 and could potentially impact the views from the highway. The mine site is partially visible from very few points along Highway 136. The existing textural contrast of the site is caused by the removal of the course-ground surface layer, and a decrease in the density the vegetation due to vegetation removal. These changes will be moderated by reclamation activities. Revegetation through naturalization and replacement of the course-ground surface rock will integrate the site with the surround area, thereby resulting in a low level of visual change to the characteristic landscape.

Air Quality

- The proposed project anticipates new disturbance of large particle greater than 10 Microns, the applicant will follow best management practices and be subject to Great Basin Unified Air Pollution Control District regulations regarding dust mitigation during operations and shall be required to obtain all necessary permits from Great Basin Unified Air Pollution Control District.

Biological

A Biological Technical Report was prepared by the applicant for the project (Attachment 5). No sensitive species were found during the 1997 or 2019 studies, the applicant proposed conducting focused surveys before disturbance occurs. The focused surveys will be a condition of approval.

Comment, California Department of Fish and Wildlife (CDFW)

CDFW staff commented that the MND does not identify what types of surveys were conducted. CDFW recommends incorporating information from the 2019 surveys into the document to provide a general description of how the surveys were conducted and to summarize survey results. Staff emailed CDFW the biological study that consisted of evaluations through nine-quad focused surveys that utilized the California Department of Fish and Wildlife (CDFW), California Natural Diversity Data Base (CNDDB), California Native Plant Society Online Inventory, U.S. Fish and Wildlife Service (USFWS) Species List, Bureau of Land Management (BLM), Special Status Animal and Plant Species Lists. The Biological technical report(Attachment 5), and MND(Attachment 4) is attached.

CDFW staff commented The MND states that lower elevation desert washes mark the site boundaries to the north and south, but it is unclear if Project activities will impact these washes. Staff emailed CDFW copies of the reclamation plan maps that clearly depict the 30 foot buffer. Caltrans will not be going into the waterways and will be contained with stakes be installed prior to disturbance occurring.

TRIBAL CONSULTATION

Prior to the Environmental review, consultation invitations were sent to the: Twenty Nine Palms Band of Mission Indians; Torres Martinez Desert Cahuilla Indians; Bishop Paiute Tribe; Fort

Independence Indian Community of Paiutes; Big Pine Paiute Tribe of the Owens Valley; Timbisha Shoshone Tribe; and, the Lone Pine Paiute-Shoshone Tribe per Tribal requests.

None of the Tribes requested consultation.

NOTICING
Amendment to Reclamation Plan 96-12/Keeler –MS#300 California Department of Transportation (Caltrans) was noticed in the Inyo Register and sent to all property owners 300-feet of the project, ten days before the Planning Commission Hearing. No public comments have been received to date.

RECOMMENDATIONS
Planning Department staff recommends the approval of Amendment to Reclamation Plan 96-12/Keeler –MS#300 California Department of Transportation with the following Findings and Conditions of Approval:

Findings:
Amendment to Reclamation Plan 96-12/Keeler –MS#300 CALTRANS

1. Based upon the Initial Study and all oral and written comments received, adopt the Mitigate Negative Declaration of Environmental Impact and certify that the provisions of the California Environmental Quality Act have been satisfied.
   [Evidence: An Initial Study and Draft Mitigated Negative Declaration of Environmental Impact were prepared and circulated for public review and comment pursuant to the provisions of the California Environmental Quality Act. The 30-day public comment period ended on October 31, 2020. Staff received 1-comment letter. The issues raised within this letter were addressed in the original Biological studies submitted by Caltrans, Staff emailed California Department of Fish and Wildlife the biological studies and no additional potentially significant environmental impacts from the proposed mining operation were determined in the course of the Initial Study and Draft Mitigated Negative Declaration of Environmental Impact circulation. Based upon the environmental evaluation of the proposed project, the Planning Department finds that the project does not have the potential to create a significant adverse impact on flora or fauna; natural, scenic and historic resources; the local economy; public health, safety, and welfare. This constitutes a Mitigated Negative Finding for the Mandatory Findings required by Section 15065 of the CEQA Guidelines.]

2. The proposed Amendment to Reclamation Plan 96-12/Keeler –MS#300 CALTRANS is consistent with the Inyo County General Plan Land Use designation of State and Federal Land (SFL).
   [Evidence: The proposed project is consistent with the County General Plan designation of State and Federal Land (SFL) as the SFL designation allows for Mining uses, under the approval of Bureau of Land Management (BLM) and accompanied by a reclamation plan (REC), approved by Inyo County, under a Memorandum of Understanding with the BLM. The County approved the original (REC 96-12) in July 1997 with mining and excavation restricted to an excavation area of approximately 4.8- acres within an overall 84.18-acre parcel. Section 08.4.4 of the General Plan Goals and Policies states: 'protect

the current and future extraction of mineral resources that are important to the County's economy while minimizing impacts on the public and the environment'. Caltrans mining currently plays a role in the County's maintenance of highway roads with local production of shale, sand and gravel crushed and screened to various sizes depending on product demand. The proposed project expansion offers local production of shale, sand and gravel and is considered a "Mining Use" No conflicts exist with policies and objectives in the other adopted elements of the General Plan.]

3. The proposed Amendment to Reclamation Plan 96-12/Keeler –MS#300 CALTRANS is consistent with the Inyo County Zoning Ordinance, which permits "Mining Uses" as a Conditional Use in the Open Space Zoning District.
   [Evidence: The proposed project is consistent with the County Zoning Ordinance designation of Open Space (OS) as the OS designation allows mining uses, as a conditional use, or when managed by the Bureau of Land Management with an approval of a plan of operation. These include Mining and processing of natural resources, including borrow pits. The proposed amendment consists of expanding the existing pit that is a continued mining use.]

4. The proposed Amendment to Reclamation Plan 96-12/Keeler –MS#300 CALTRANS is necessary or desirable.
   [Evidence: General Plan Policy ED-4.1-Support the continued operation of existing mining activities within the County as well as new mining in appropriate areas. This project is adding to an existing site and offers an essential public service by providing maintenance of highway roads with local production of shale, sand and gravel; therefore, this is a desirable use.]

5. The proposed Amendment to Reclamation Plan 96-12/Keeler –MS#300 CALTRANS is appropriately related to other uses and transportation and service facilities in the vicinity.
   [Evidence: The proposed expansion is located on an existing site currently used for a Decomposed Granite pit and all of its related uses. The project reduces the vehicle miles traveled by utilizing local resources; therefore, reducing the impact on transportation facilities and having no impact on service facilities.]

6. The proposed Amendment to Reclamation Plan 96-12/Keeler –MS#300 CALTRANS would not, under all the circumstances of this case, affect adversely the health or safety of persons living or working in the vicinity or be materially detrimental to the public welfare.
   [Evidence: The proposed expansion is approximately 3.5 miles away from the nearest town. No chemicals will be used on-site or chemical processing, only crushing and screening. There will be no chemical waste or pollution from the mining operation. The applicant shall be subject to the requirements set by the Great Basin Unified Air Pollution Control District during the operation of the site for dust mitigation, and subject to Certified Unified Program Agency requirements specified by the Inyo County Environmental Health Department.]

7. Operating requirements necessitate the Amendment to Reclamation Plan 96-12/Keeler – MS#300 CALTRANS located within the Open Space (OS-40) zoning district. *[Evidence: The proposed amendment is substantial which makes this update necessary per the County's Surface Mining and Land Reclamation Ordinance.*

CONDITIONS OF APPROVAL

Term of Plan and Timing of Reclamation

1. The term of the reclamation plan shall not exceed fifty years from the date of approval, or no later than January 27, 2071. The total amount of usable aggregate and waste material that can be removed from this pit is 300,000 cubic yards. If the 300,000 cubic yards are removed prior to the termination date, reclamation shall proceed with in six months of it. The Planning Commission may grant an extension. The applicant must first 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. Throughout the 50-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 cannot 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 due annually prior to the required yearly SMARA inspection or on the day of the inspection.

Conditions of Mitigated Negative Declaration

4. All conditions outlined in the Mitigated Negative Declaration are hereby considered conditions of this reclamation plan.
5. The 30 foot dessert wash buffer stakes must be in place prior to ground disturbance takes place.
6. The focused survey shall be conducted prior to disturbance occurring. Caltrans shall provide a copy of the report to the Lead Agency, BLM, CDFW.

Conditions of Amendment to Reclamation Plan 96-12/Keeler

7. All mining procedures and reclamation outlined in MS#300 Keeler Pit Reclamation plan revised October 27, 2020 shall be recorded by the Planning department upon approval. The recorded copy shall be the official reclamation plan that both the lead agency and operator will follow.

Financial Assurances

8. Financial assurances in the sum of $43,090.45 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

9. Financial assurances shall be recalculated each year in accordance with Section 2773. l(a)(3) of SMARA and the Inyo County Code. This shall occur at the time of annual inspection.

Release of Financial Assurances

10. 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. BLM must be present during final inspection and concur with the Lead Agency that all performance standards have been achieved.

Inyo County Road Department

11. Caltrans shall allow the Inyo County Road Department to remove material form this site. Caltrans shall be responsible for all reclamation requirements, including bonding and reporting. When the 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 taken to Caltrans each calendar quarter.

Compliance with County Code

12. The applicant/Operator shall conform to all applicable provisions of Inyo County Code, County Ordinances, State laws and regulations, and Federal laws and regulations.

Hold Harmless

13. The applicant/operator shall defend, indemnify and hold harmless Inyo County agents, officers, and employees from any claim, action or proceeding against the County or its agents, officers, or employees to attack, set aside, void or annul an approval of the county, its advisory agencies, its appeals board, or legislative body concerning Amendment to Reclamation Plan 96-12/Keeler –MS#300 CALTRANS. The County reserves the right to prepare its own defense.

ATTACHMENTS:

1. Vicinity Map
2. Reclamation Plan Maps
3. DMR Response
4. Mitigated Negative Declaration
5. Biological studies
6. Reclamation Plan

AMENDMENT REC 96-12 CALTRANS KEELER

Attachment 1

AMENDMENT REC 96-12 CALTRANS KEELER

Attachment 1

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
09	Iny	136	15.5	1	8

STATE OF CALIFORNIA

DEPARTMENT OF TRANSPORTATION

PROJECT PLANS FOR CONSTRUCTION ON

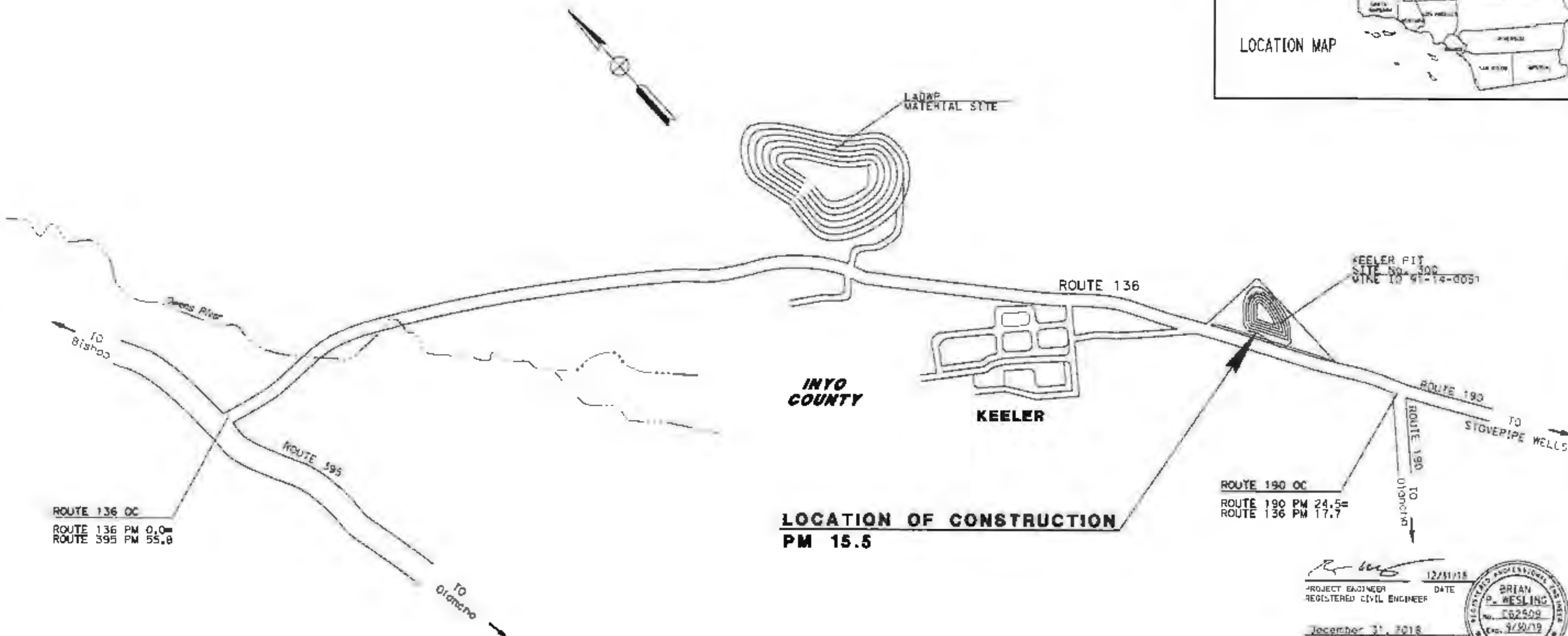
STATE HIGHWAY

IN INYO COUNTY NEAR OWENS LAKE
AT 2.6 MILES SOUTHEAST OF THE COMMUNITY OF KEELER
AT KEELER MATERIAL SITE No. 300

TO BE SUPPLEMENTED BY STANDARD PLANS DATED 2018

INDEX OF PLANS

SHEET No.	DESCRIPTION
1	TITLE AND LOCATION MAP
2-5	LAYOUT
6-7	CONSTRUCTION DETAILS



NO SCALE

PROJECT ENGINEER: FOREST BECKET
DESIGN ENGINEER: BRIAN WESLING

12/31/18
PROJECT ENGINEER
REGISTERED CIVIL ENGINEER
DATE

BRIAN P. WESLING
No. C62509
Exp. 9/30/19
CIVIL
STATE OF CALIFORNIA

December 31, 2018
PLANS APPROVAL DATE

THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF SCANNED COPIES OF THIS PLAN SHEET.

THE CONTRACTOR SHALL POSSESS THE CLASS (OR CLASSES) OF LICENSE AS SPECIFIED IN THE "NOTICE TO BIDDERS."

CONTRACT No.	09-374004
PROJECT ID	0918000071

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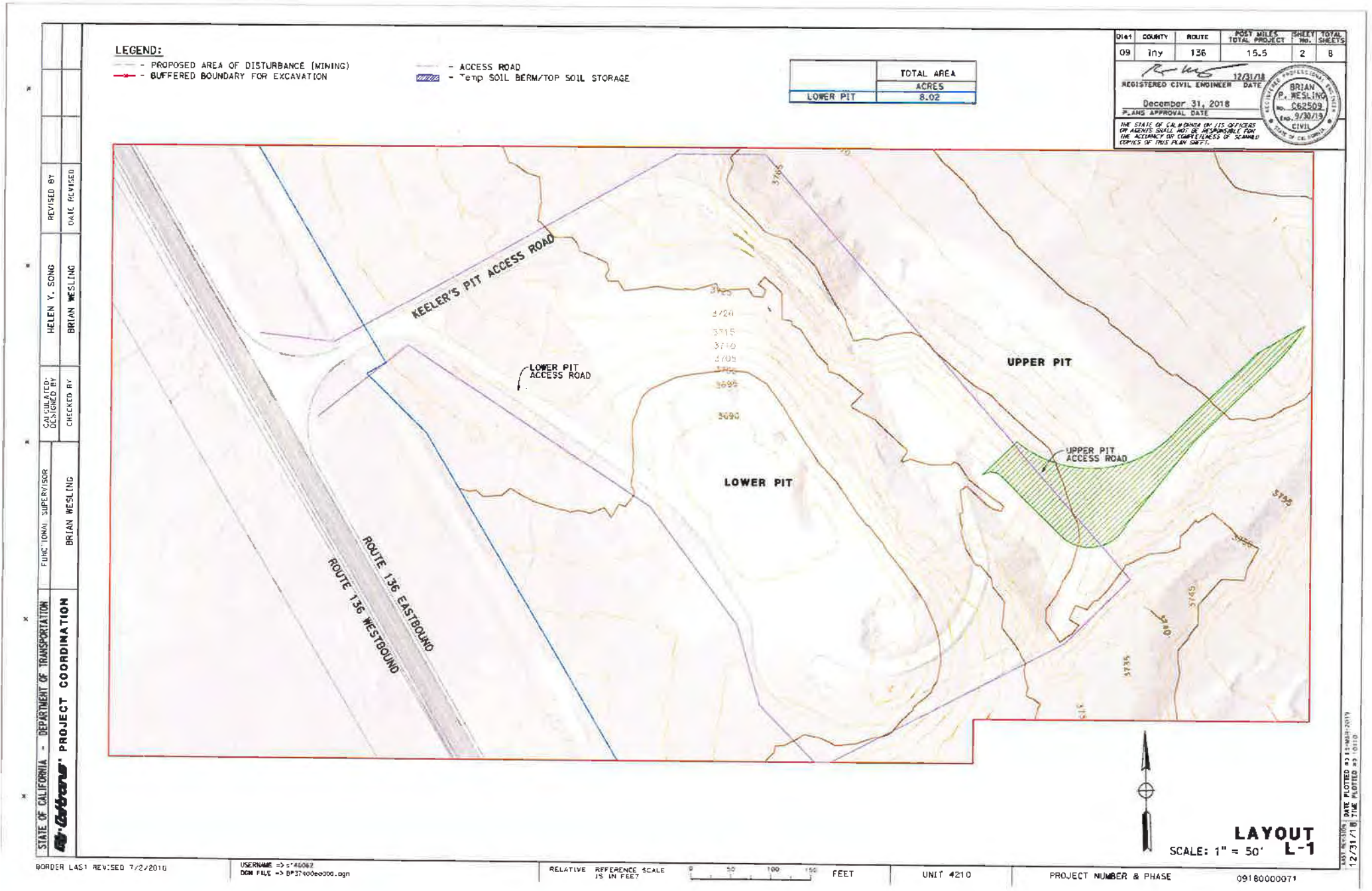
TIME PLOTTED => 10:10:47 AM
12-31-18

Attachment 1

Atachment 2


LEGEND:
PROPOSED AREA OF DISTURBANCE (MINING)
BUFFERED BOUNDARY FOR EXCAVATION
ACCESS ROAD
Temp SOIL BERM/TOP SOIL STORAGE
TOTAL AREA
ACRES
LOWER PIT
8.02
Dist
COUNTY
ROUTE
POST MILES TOTAL PROJECT
SHEET No.
TOTAL SHEETS
09
Iny
136
15.5
2
8
REGISTERED CIVIL ENGINEER
12/31/18
DATE
December 31, 2018
PLANS APPROVAL DATE
BRIAN P. WESLING No. C62509 Exp. 9/30/19 CIVIL
THE STATE OF CALIFORNIA, ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF SCANNED COPIES OF THIS PLAN SHEET.
STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION
PROJECT COORDINATION
FUNCTIONAL SUPERVISOR
BRIAN WESLING
CALCULATED-DESIGNED BY
CHECKED BY
HELEN Y. SONG
BRIAN WESLING
REVISED BY
DATE REVISED
KEELER'S PIT ACCESS ROAD
LOWER PIT ACCESS ROAD
UPPER PIT
UPPER PIT ACCESS ROAD
LOWER PIT
ROUTE 136 EASTBOUND
ROUTE 136 WESTBOUND
LAYOUT
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UNIT 4210
PROJECT NUMBER & PHASE
0918000007I
LAST REVISED
DATE PLOTTED => 31-MAR-2019
TIME PLOTTED => 07:10
12/31/18

Atachment 2

LEGEND:
— PROPOSED AREA OF DISTURBANCE (MINING) - BUFFERED BOUNDARY FOR EXCAVATION
— = ACCESS ROAD
▬ = Temp SOIL BERM/TOP SOIL STORAGE

UPPER PIT	AREA (bottom) ACRES	AREA (top) ACRES	RAW MATERIAL VOLUME CY	ESTIMATED EXCAVATION DEPTH FT
PHASE I	1.33	4.24	176,500	38
PHASE II	1.33	5.40	67,500	38
PHASE III	2.70	6.70	70,500	40
PHASE IV (FINAL)	4.11	8.10	59,250	27

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
09	Iny	136	15.5	3	8

REGISTERED CIVIL ENGINEER 12/31/18 DATE

December 31, 2018
PLANS APPROVAL DATE

BRIAN P. WESLING No. C62509 Exp. 9/30/19 CIVIL — REGISTERED PROFESSIONAL ENGINEER — STATE OF CALIFORNIA

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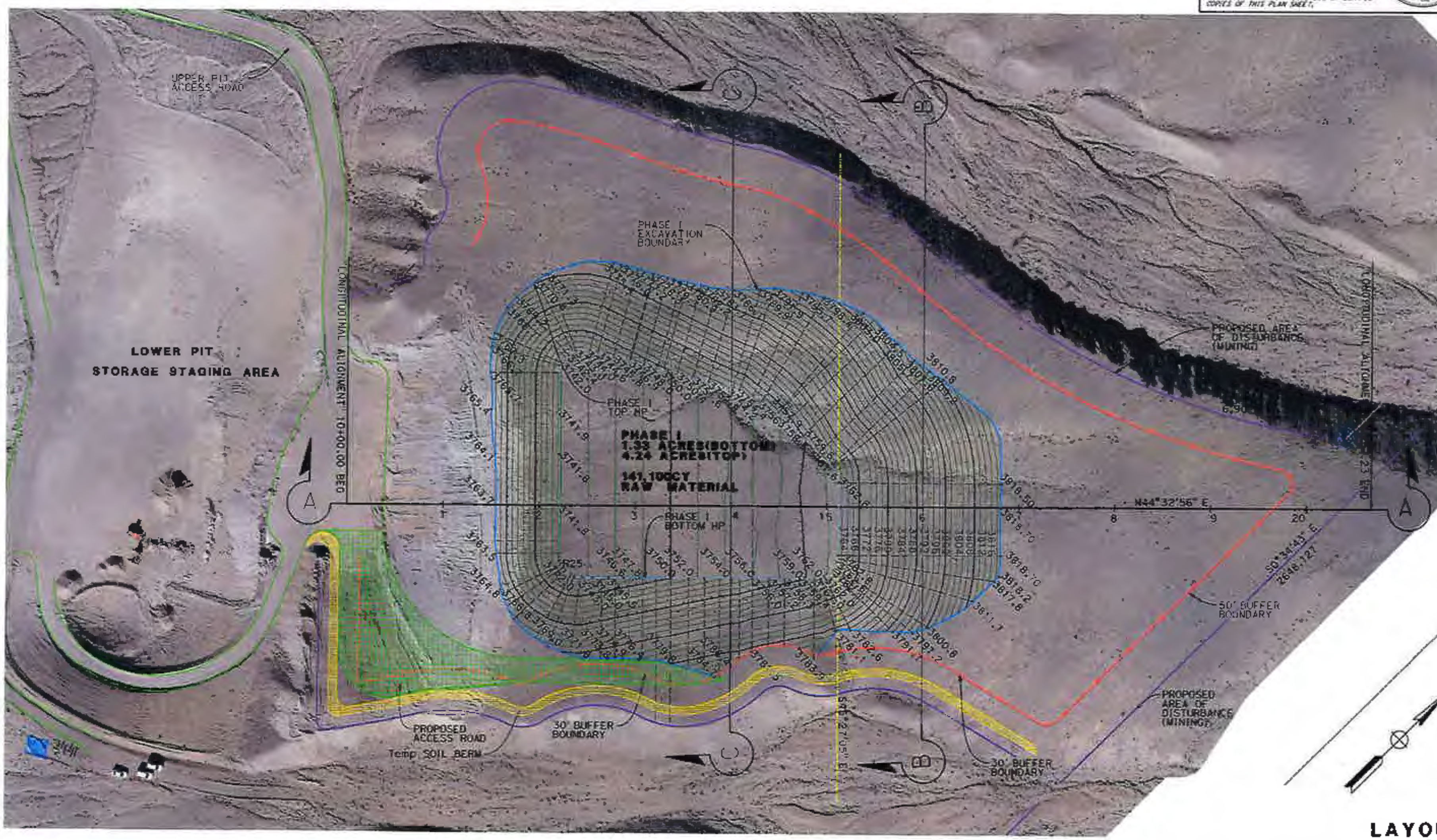

LAYOUT L-2

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION
Caltrans PROJECT COORDINATION

FUNCTIONAL SUPERVISOR: BRIAN WESLING | CALCULATED-DESIGNED BY / CHECKED BY: HELEN Y. SONG / BRIAN WESLING | REVISED BY / DATE REVISED

BORDER LAST REVISED 7/2/2010 | RELATIVE REFERENCE SCALE IS IN FEET 0 50 100 150 FEET | UNIT 4210 | PROJECT NUMBER & PHASE 0918000071

DATE PLOTTED 12/31/18

Atachment 2

LEGEND:

- PROPOSED AREA OF DISTURBANCE (MINING)
- BUFFERED BOUNDARY FOR EXCAVATION
- ACCESS ROAD
- TEMP SOIL BERM/TOP SOIL STORAGE

UPPER PIT	AREA (bottom) ACRES	AREA (top) ACRES	RAW MATERIAL VOLUME CY	ESTIMATED EXECAVATION DEPTH FT
PHASE I	1.33	4.24	176,500	35
PHASE II	1.33	5.40	67,500	36
PHASE III	2.70	6.70	70,500	40
PHASE IV (FINAL)	4.11	5.10	59,250	27

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
09	Iny	136	15.5	4	8

REGISTERED CIVIL ENGINEER 12/31/18 DATE

December 31, 2018
PLANS APPROVAL DATE

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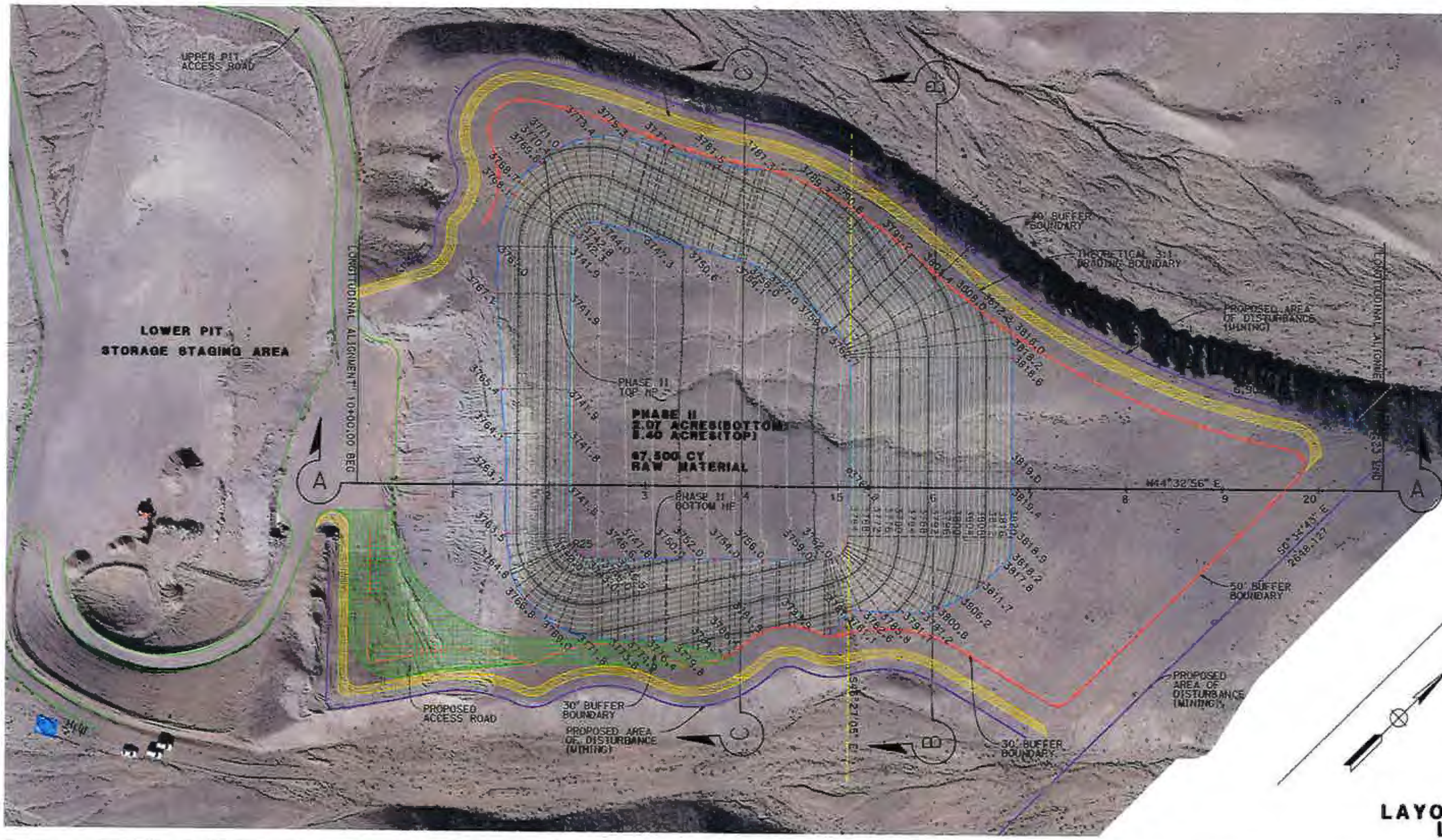
REGISTERED PROFESSIONAL ENGINEER BRIAN P. WESLING No. C62509 Exp. 9/30/19 CIVIL STATE OF CALIFORNIA



LAYOUT L-3

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION
Caltrans PROJECT COORDINATION

FUNCTIONAL SUPERVISOR: BRIAN WESLING
CALCULATED-DESIGNED BY: FELIX Y. SONG
CHECKED BY: BRIAN WESLING
REVISED BY
DATE REVISED

BORDER LAST REVISED 7/2/2010
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UNIT 4210
PROJECT NUMBER & PHASE 0318000071

Atachment 2

LEGEND:
- PROPOSED AREA OF DISTURBANCE (MINING)
- BUFFER BOUNDARY FOR EXCAVATION
- ACCESS ROAD
- TEMP. SOIL BERM/TOP SOIL STORAGE

UPPER PIT	AREA (BOTTOM) ACRES	AREA (TOP) ACRES	RAW MATERIAL VOLUME CY	ESTIMATED EXCAVATION DEPTH FT
PHASE I	1.33	4.29	76,300	38
PHASE II	1.33	5.40	67,500	38
PHASE III	2.70	6.70	70,500	40
PHASE IV (FINAL)	4.11	9.10	59,250	27

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
09	Inyo	136	19.5	5	8

12/31/18
REGISTERED CIVIL ENGINEER DATE

December 31, 2018
PLANS APPROVAL DATE

BRIAN P. WESLING No. C62509 Exp. 9/30/19 CIVIL

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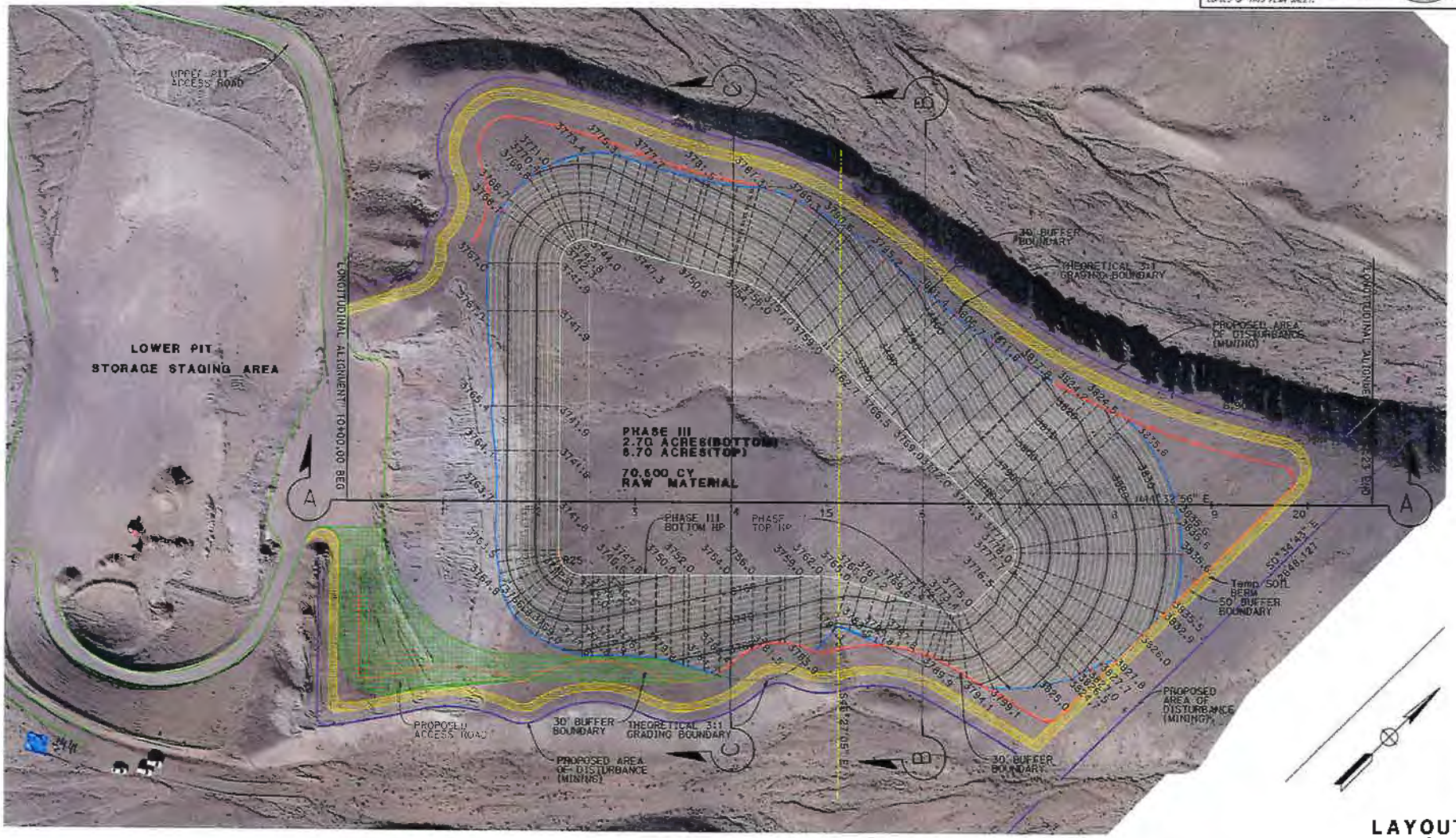

LAYOUT L-4

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION
PROJECT COORDINATION
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CALCULATED-DESIGNED BY
CHECKED BY
DETAILED BY
REVISED BY
DATE REVISED

BORDER LAST REVISED 7/2/2010
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RELATIVE REFERENCE SCALE IS IN FEET 0 50 100 150 FEET
UNIT 4210
PROJECT NUMBER & PHASE

Atachment 2

LEGEND:
- PROPOSED AREA OF DISTURBANCE (MINING)
- BUFFERED BOUNDARY FOR EXCAVATION
- ACCESS ROAD
- Temp SOIL DERIVATION SOIL STORAGE

UPPER PIT	AREA (bottom)	AREA (top)	RAW MATERIAL VOLUME	ESTIMATED EXECAVATION DEPTH
	ACRES	ACRES	CY	FT
PHASE I	1.33	4.24	176,300	36
PHASE II	1.33	5.40	67,500	36
PHASE III	2.70	6.70	70,500	40
PHASE IV (FINAL)	4.11	8.10	59,250	27

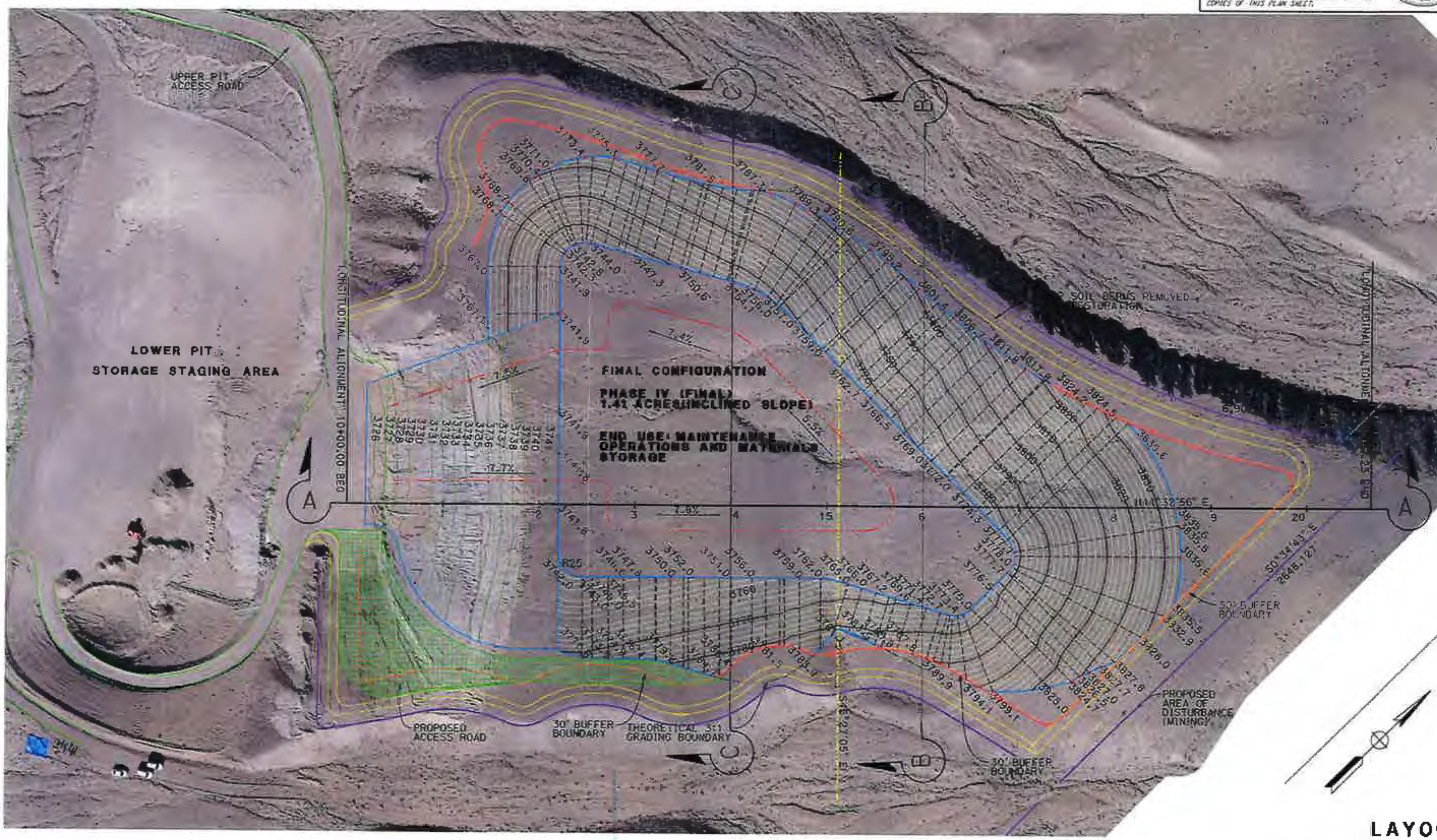
DIST	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
09	Iny	136	15.5	6	8

12/31/18
REGISTERED CIVIL ENGINEER DATE

December 31, 2018
PLANS APPROVAL DATE

REGISTERED PROFESSIONAL ENGINEER BRIAN P. WESLING No. C62509 Exp. 9/30/19 CIVIL STATE OF CALIFORNIA

THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF SCANNED COPIES OF THIS PLAN SHEET.



LAYOUT L-5

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION
Caltrans PROJECT COORDINATION

FUNCTIONAL SUPERVISOR: BRIAN WESLING | CALCULATED-DESIGNED BY: HELEN Y. SONG | CHECKED BY: BRIAN WESLING | REVISED BY | DATE REVISED

BORDER LAST REVISED 7/2/2010 | RELATIVE REFERENCE SCALE IS IN FEET 0 50 100 150 | UNIT 4210 | PROJECT NUMBER & PHASE 0918000007

DATE PLOTTED => 12/31/18

DocuSign Envelope ID: 2D1BEED8-BC31-480B-A9B7-805299F87342

Attachment 3

California
Department of Conservation
Division of Mine Reclamation

Gavin Newsom, Governor
David Shabazian, Director

July 27, 2020

Ms. Ryan Smith-Standridge
Inyo County Planning Department
168 N Edwards Street
Independence, CA 93526

Sent via email: rstandridge@inyocounty.us

Comments on Proposed Reclamation Plan Amendment
Keeler Pit (California Mine ID #91-14-0051)

Dear Ms. Smith-Standridge:

The Department of Conservation's Division of Mine Reclamation (Division) received a Reclamation Plan Amendment (RPA) for the Keeler Pit, submitted by Inyo County (County) on May 26, 2020. The County is the lead agency under the Surface Mining and Reclamation Act of 1975 (SMARA; Public Resources Code (PRC) Section 2710 et seq.). The operator, California State Department of Transportation (Caltrans), is proposing to expand mining activities by an additional 8.1 acres.

The submittal included these documents:

- Revised Keeler Pit Reclamation Plan (July 2019)
- Appendices A-G
- Biological Resource Clearance Memo (Aalbu, May 2019)
- Paleontological Report (Bowers, April 2019)

SMARA statutes (PRC Division 2, Chapter 9, Section 2710 et seq.) and associated regulations (California Code of Regulations [CCR] Title 14, Division 2, Chapter 8, Subchapter 1, Articles 1 and 9) require that specific items be addressed or included in reclamation plans. Prior to approving the amendments to the reclamation plan, please consider the following comments, which were prepared by Division staff pursuant to PRC Section 2772.1(b)(2).

Revegetation Considerations

(Refer to PRC Section 2773 and CCR Sections 3503 and 3705)

Comment 1-

CCR Section 3503(b) requires that "Test plots be conducted simultaneously with mining...to ensure successful implementation of the revegetation plan".

Division staff recommends implementing test plots on site, or provide documentation that similar species, conditions, and/or experienced professional advice waive these requirements.

Attachment 3

Ms. Smith-Standridge
Keeler Pit
July 27, 2020

Comment 2-

CCR Section 3503(m) requires "quantitative measures of vegetative cover, density, and species richness of the reclaimed mined-lands to similar parameters of naturally occurring vegetation in the area. Either baseline data or data from nearby reference areas may be used as the standard for comparison".

The RPA provides success criteria for 0.16 percent vegetative cover (RPA, pg. 32). Given the sparseness of the vegetative area, it is unclear if a quantitative measure of density is appropriate; however, species richness as a measure of success criteria should be included in the revegetation plan to ensure successful revegetation efforts. This information could be included as a plant list or table that specifies which species will be selected for seed collection or depended upon for natural recruitment. Division staff recommends updating the RPA to include this information.

The Division looks forward to the County's response to these comments and 30-day notice of intent to approve the RPA. If you have any questions on these comments, please contact us at (916) 323-9198.

Sincerely,

DocuSigned by:
Carol E. Atkins
73ECCB8738194DA...
Carol E. Atkins,
Manager
Environmental Services Unit

DocuSigned by:
29D2BE549209416
Paul Fry, PG
Manager
Engineering and Geology Unit

DocuSigned by:
Claire Meehan
7C67E0775504421
Claire Meehan
Restoration Ecologist
Environmental Services Unit

DocuSigned by
29D2BE549209416
Jacquelynn Moore
Engineering Geologist
Engineering and Geology Unit

ec:
Forest Becket, Caltrans; forest.becket@DOT.ca.gov

Attachment 3

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

Phone: (760) 878-0263
FAX: (760) 872-2712
E-Mail: inyoplanning@inyocounty.us

December 22, 2020

California Department of Conservation

Attn: Environmental Services Unit

RE: 30-DAY ADVANCE NOTICE OF INTENT TO APPROVE AMENDMENT TO RECLAMATION PLAN 96-12/KEELER –MS#300 CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS). MINE ID #91-14-0051

Pursuant to Public Resources Code (PRC) Section 2772.1(b)6(A), the County of Inyo is hereby providing advance notice to the Division of Mine Reclamation (DMR) of staff's intent to recommend approval of the Amendment to Reclamation Plan 96-12/Keeler – MS#300 California Department of Transportation (Caltrans). The applicant has applied for an amendment to Reclamation Plan 96-12. The project proposes expanding mining operations at Keeler Pit MS #300 for continued maintenance of dirt shoulders in Inyo County. Approximately 300,000 cubic yards of material will be extracted from the site over a 30 to 50-year span in an 8.1 acre-expansion area. Mining will occur in 4 phases, entailing the creation of a dirt access road and material extraction pit east and southeast of the existing pit. Four to six inches of topsoil will be relocated to soil berms on the north, south and east edges of the pit. The pit will be graded to ensure storm water containment (final slope configuration 3:1 or flatter). All equipment storage and operations will occur within the limits of the existing (lower) pit. A retention basin, to manage and contain all storm water, will be constructed in the lower pit. This aggregate pit is located on BLM land near Owens Lake in Inyo County with a Tax Assessor Parcel Number 031-010-19. County staff is in receipt and concur with DMR's July 27, 2020 letter addressing identified deficiencies to the Reclamation Plan. Caltrans has submitted the requested changes and staff is moving forward with getting the project presented to the Planning Commission for approval. The decision is anticipated to occur on January 27, 2021.

Thank you,

Ryan Kay Standridge

Ryan Standridge
Associate Planner/SMARA Coordinator, Inyo County

Planning Department
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DRAFT MITIGATED NEGATIVE DECLARATION OF ENVIRONMENTAL IMPACT AND INITIAL STUDY

PROJECT TITLE: Amendment to Reclamation Plan 96-12/Keeler –MS#300 California Department of Transportation (Caltrans).

PROJECT 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 3.5 miles southeast of the town of Keeler. 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 2). The Tax Assessor Parcel Number (APN) 031-010-19 (please see attached maps).

PROJECT DESCRIPTION: The applicant has applied for an amendment to Reclamation Plan 96-12. The project proposes expanded mining operations at Keeler Pit MS #300 for continued maintenance of dirt shoulders in Inyo County. Approximately 300,000 cubic yards of material will be extracted from the site over a 30 to 50-year span in an 8.1 acre-expansion area. Mining will occur in 4 phases, entailing the creation of a dirt access road and material extraction pit east and southeast of the existing pit. Four to six inches of topsoil will be relocated to soil berms on the north, south and east edges of the pit. The pit will be graded to ensure storm water containment (final slope configuration 3:1 or flatter). All equipment storage and operations will occur within the limits of the existing (lower) pit. A retention basin, to manage and contain all storm water, will be constructed in the lower pit.

FINDINGS:

A. The proposed project is consistent with goals and objectives of the Inyo County General Plan.

The proposed project is consistent with the County General Plan designation of 'Open Space and State and Federal Land (SFL) as the SFL designation allows for Mining uses under the approval of Bureau of Land Management accompanied by the reclamation plan(REC) approved by Inyo County under the Memorandum of understanding. The County approved the original (REC 96-12) in July 1997 with mining and excavation restricted to an excavation area of approximately 4.8 acres within an overall 84.18-acre parcel. Section 08.4.4 of the General Plan Goals and Policies states: 'protect the current and future extraction of mineral resources that are important to the County's economy while minimizing impacts on the public and the environment'. Caltrans mining currently plays a role in the County's maintenance of highway roads with local production of shale, sand and gravel crushed and screened to various sizes depending on product demand.

B. The proposed project is consistent with the provisions of the Inyo County Zoning Ordinance.

The proposed project is consistent with the County Zoning Ordinance designation of 'Open Space (OS) as the OS designation allows mining uses, as a conditional use or when managed by Bureau of Land Management an approval of a plan of operation. These include Mining and processing of natural resources, including borrow pits. The proposed amendment consists of expanding the existing pit that is a continued mining use.

C. Potential adverse environmental impacts will not exceed thresholds of significance, either individually or cumulatively.

Based on the proposed amendment to reclamation plan, the project is consistent with the requirements of Chapter 7.70 - Surface Mining and Land Reclamation of the Inyo County Code and will not exceed thresholds of significance individually or cumulatively.

D. Based upon the environmental evaluation of the proposed project, the Planning Department finds that the project does not have the potential to create a significant adverse impact on flora or fauna; natural, scenic and historic resources; the local economy; public health, safety, and welfare. This constitutes a Mitigated Negative Finding for the Mandatory Findings required by Section 15065 of the CEQA Guidelines.

Staff's assessment of the parcel described it as being mostly uniform throughout and comprised of shale, gravel, and sand. The site's vegetation is sparse and no special status species were found during the survey. Most of the site is undisturbed except for the disturbances due to the existing mining operations, which border the southernmost end of the project site and include unpaved roads, and pit.

The 30-day public & State agency review period for this Draft Mitigated Negative Declaration will expire on October 1, 2020. 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 if you have any questions regarding this project.

Cathreen Richards
Director, Inyo County Planning Department

8/31/20
Date

INYO COUNTY PLANNING DEPARTMENT

CEQA APPENDIX G: INITIAL STUDY & ENVIRONMENTAL CHECKLIST FORM

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) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) 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. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

a) Earlier Analysis Used. Identify and state where they are available for review.

b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:
   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance issues.

Attachment 4

Planning Department
168 North Edwards Street
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INYO COUNTY PLANNING DEPARTMENT

APPENDIX G: CEQA INITIAL STUDY & ENVIRONMENTAL CHECKLIST FORM

1. **Project title:** Amendment to Reclamation Plan 96-12/Keeler –MS#300 California Department of Transportation (Caltrans).

2. **Lead agency name and address:** Inyo County Planning Department, P.O. Box L Independence, Ca 93526

3. **Contact person and phone number:** Ryan Standridge, Associate Planner, (760) 878-0405

4. **Project 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 3.5 miles southeast of the town of Keeler. 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 2). The Tax Assessor Parcel Number (APN) 031-010-19 (please see attached maps).

5. **Project sponsor's name and address:** California State Department of Transportation -District 9(CALTRANS) 500 S. Main St. Bishop, Ca 93514

6. **General Plan designation:** State and Federal Lands (SFL)

7. **Zoning:** Open Space (OS)

8. **Description of project**: The applicant has applied for an amendment to Reclamation Plan 96-12. The Project proposes expanded mining operations at Keeler Pit MS #300 for continued maintenance of dirt shoulders in Inyo County. Approximately 300,000 cubic yards of material will be extracted from the site over a 30 to 50-year span, in an 8.1 acre-expansion area. Mining will occur in 4 phases, entailing the creation of a dirt access road and material extraction pit east and southeast of the existing pit. Four to six inches of topsoil will be relocated to soil berms on the north, south and east edges of the pit. The pit will be graded to ensure storm water containment (final slope configuration 3:1 or flatter). All equipment storage and operations will occur within the limits of the existing (lower) pit. A retention basin, to manage and contain all storm water, will be constructed in the lower pit.

9. **Surrounding land uses and setting:** The Property is surrounded by Vacant Public lands.

Location:	Use:	Gen. Plan Designation	Zoning
Site	Mine	State And Federal Land (SFL)	Open Space with a 40 Acre minimum (OS-40)

North	Vacant Public Land	State And Federal Land (SFL)	Open Space with a 40 Acre minimum (OS-40)
East	Vacant Public Land	State And Federal Land (SFL)	Open Space with a 40 Acre minimum (OS-40)
South	Vacant Public Land	State And Federal Land (SFL)	Open Space with a 40 Acre minimum (OS-40)
West	Vacant Land	Natural resources (NR)	Open Space with a 40 Acre minimum (OS-40)

10. Other public agencies whose approval is required: Department of Conservation, California Department Fish and Wildlife, Bureau of Land Management.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Inyo County started the 30-day Consultation according to Public Resource code section 21080.31. by sending out a certified written notice that described the project and location. The tribes notified are as follows: Big Pine Tribe of Owens Valley, Bishop Paiute Tribe, Fort Independence Indian Community of Paiutes, Lone Pine Paiutes-Shoshone Tribe, Timbisha Shoshone tribe, Twenty-Nine Palms Band of Mission Indians, Cabazon Band of Indians. As of August 27, 2020, there has been no request formal request for a consultation submitted to the Planning Director.

Attachment 4

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics Resources	☐ Agriculture & Forestry	☒ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology /Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☒ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Ryan Standridge, Assistant Planner
Inyo County Planning Department

Date

INYO COUNTY PLANNING DEPARTMENT
ENVIRONMENTAL CHECKLIST FORM

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
I. AESTHETICS -- Would the project: a) Have a substantial adverse effect on a scenic vista?	☐	☒	☐	☐

No, the mine site is partially visible from very few points along Highway 136. The existing textural contrast of the site is caused by the removal of the course ground-surface layer, and a decrease in the density the vegetation due to vegetation removal. These changes will be moderated by reclamation activities. Revegetation through naturalization and replacement of the course ground-surface faction will integrate the site with the surround area, thereby resulting in a low level of visual change to the characteristic landscape.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

No, the proposed expansion will not damage scenic resources; there are no nearby trees rock outcroppings or historic buildings in the general area.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☒	☐	☐

No, the mine site will not substantially degrade the visual character as it is partially visible from very few points along Highway 136. 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. Reclamation activities will moderate these changes. Revegetation through naturalization and replacement of the course ground-surface faction will integrate the site with the surrounding area, thereby resulting in a low level of visual change to the characteristic landscape.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

No, the proposed expansion will not create a new source of substantial light or glare as site operations are conducted during daylight.

II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including The Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology Provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
Monitoring Program of the California Resources Agency, to non-agricultural use?				
No, the proposed expansion will not be located on farmland.				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
No, the proposed expansion will not be located on land zoned for agriculture. There are no Williamson Act contracts in Inyo County.				
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
No, the proposed expansion will not be located on forested land.				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
No, the proposed expansion will not be located on forested land.				
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒
No, the proposed location will not cause changes to the surrounding environment that could result in any losses to farmland or agricultural uses.				
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
No, although there are portions of Inyo County within non-attainment areas for Federal and State PM10 (particulate matter 10 microns or less in diameter) ambient air quality standards, the primary source for this pollution is the Owens dry lake, located approximately 4.7-miles from the project site. The proposed project anticipates new disturbance of large particle greater than 10 Microns. The applicant will be subject to Great Basin Unified Air Pollution Control District regulations regarding dust mitigation during operation and shall be required to obtain all necessary permits from Great Basin Unified Air Pollution Control District.				
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐

Attachment 4

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact

No, although there are portions of Inyo County within non-attainment areas for Federal and State PM10 (particulate matter 10 microns or less in diameter) ambient air quality standards, the primary source for this pollution is the Owens dry lake, located approximately 4.7-miles from the project site. The proposed project anticipates new disturbance of large particle greater than 10 Microns. The applicant will be subject to Great Basin Unified Air Pollution Control District regulations regarding dust mitigation during operation and shall be required to obtain all necessary permits from Great Basin Unified Air Pollution Control District.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	☒

No, although there are portions of Inyo County within non-attainment areas for Federal and State PM10 (particulate matter 10 microns or less in diameter) ambient air quality standards, the primary source for this pollution is the Owens dry lake, located approximately 4.7-miles from the project site. The proposed project anticipates new disturbance of large particle greater than 10 Microns. The applicant will be subject to Great Basin Unified Air Pollution Control District regulations regarding dust mitigation during operation and shall be required to obtain all necessary permits from Great Basin Unified Air Pollution Control District.

d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

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 and topsoil berms. The physical walls of the pit and the considerable distance to sensitive receptors will reduce the potential noise impact from mining. The nearest community is approximately 3.5 miles away.

e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

No, the proposed exponsion does not create odor affecting a substantial number of people. Also, there are no sensitive receptors near the project location. The nearest community is approximately 3.5 miles away.

IV. BIOLOGICAL RESOURCES: Would the project: a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

No, based on staff's review of the CNDDB there are no known candidate, sensitive, or threatened species on the site, and a biological and botanical study was completed on the project area for Cal Trans in 1997. An additional biological survey was also conducted on the project site in May 2019. Although no sensitive species were found during the 1997 or 2019 studies, the applicant proposed conducting focused surveys before disturbance occurs. The proposed mine areas are located at the southern end of Owens River Valley on an upland mesa/bluff, at an elevation range of 1100- 1200 meters (m), with lower elevation desert washes marking the site boundaries to the north and south. A minimum 30-foot offset boundary will be demarcated with metal stakes to buffer the edge of the bluff and provide a visual cue for excavation activities that will protect the area outside of the project boundary.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒

Attachment 4

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact

No, the proposed expansion area is not located in a National Marine Fisheries Service (NMFS) and does not include any riparian habit. Also, no impacts to riparian habitat will occur due to the proposed activities.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? ☐ ☐ ☐ ☒

No, the proposed expansion area is not located in a National Marine Fisheries Service (NMFS) and does not include any riparian habit. Also, no impacts to riparian habitat will occur due to the proposed activities

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? ☐ ☐ ☐ ☒

No, a biological study was completed in the project area. It determined that the level of disturbance from the existing mining operations and the general lack of suitable habitat within the immediate project vicinity, results in no interference with any native resident, migratory fish, or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? ☐ ☐ ☐ ☒

No, the project site will not affect trees or other biological resources. Also, Inyo County does not have a tree preservation policy or ordinance.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? ☐ ☐ ☐ ☒

No, the project site is not located on or near a conservation area and will not affect an adopted habitat conservation plan, Natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

V. CULTURAL RESOURCES: Would the project:
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? ☐ ☐ ☒ ☐

No, the original Plan (RP 96-12) was approved by the County in July 1997. An archaeological investigation was conducted in 1992 for approximately 100 Acres of land surrounding the site and again May of 2019 and both reports determined that there are no resources that would be defined per 15064.5. In the unlikely event a historical resource is found during mining activities, a condition is included that work will stop until the resource can be evaluated.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? ☐ ☐ ☒ ☐

Attachment 4

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact

No, an archaeological investigation was conducted in 1992 for approximately 100 Acres of land surrounding the site and again May of 2019 and both reports determined that there are no significant resources that would be defined per 15064.5. In the unlikely event a historical resource is found during mining activities, a condition is included that work will be stopped until the resource can be evaluated.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

No, an archaeological investigation was conducted in 1992 for approximately 100 acres of land surrounding the site and again in May 2019 and both reports determined that there are no resources that would be defined per 15064.5. In the unlikely event a historical resource is found during mining activities, a condition is included that work will stop until the resource can be evaluated. In the event that human remains or related cultural materials are encountered, Section 15064.5(e) of CEQA requires work to be stopped, and the County Coroner notified in accordance with California Health and Safety Code 7050.5. In the unlikely event human remains are found during mining activities, work will be stopped until the resource can be evaluated and appropriately handled per Chapter 9.52 of the Inyo County Code - Disturbance of Archaeological, Paleontological and Historical Features.

VI. ENERGY: Would the project: a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒

No, the site does not have buildings or power poles that require consumption of electricity therefore the proposed expansion area does not impact the consumption of energy resources during operations.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency	☐	☐	☒	☐

No, the expansion does not obstruct state or local renewable energy plans but the project site is located in a local renewable energy overlay. The proposed expansion only utilizes approximately twenty five percent of the parcel leaving the remaining seventy five percent on the west side available. However, the parcel is regulated by BLM.

VII. GEOLOGY AND SOILS: Would the project: a) Directly or indirectly cause substantial adverse effects, including the risk of loss injury, or death involving:	☐	☐	☐	☒
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				

No, the project area is not located within an Alquist-Priolo Earthquake Fault Zone.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

Ground shaking may occur anywhere in the region, due to numerous earthquake faults, regardless of whether the project site is within an identified Alquist-Priolo zone or not. However, the Uniform Building Code ensures that future structures shall constructed to required seismic standards (Level IV) to withstand such shaking, so this potential impact is considered less than significant.

iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒

Attachment 4

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
No, the project area is not within an area of soils known to be subject to liquefaction.				
iv) Landslides?	☐	☐	☐	☒
No, the project area is not subject to landslides.				
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
No, the approved RP96-12 project site is required to conform to all drainage, grading, and "Best Management Practice (BMP)" requirements as set forth by the Inyo County Public Works Department, Inyo County of Inyo Environmental Health Services Department, and other associated regulatory agencies will be written into the Conditions of Approval for the Reclamation Plan Amendment. As a result of this regulation, potential impacts are considered less than significant.				
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
No, the project is not located on a geologic unit or soil that is considered unstable.				
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒
No, the project is not located on a geologic unit or soil that is considered expansive.				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
No, the site does not have water or septic on site. The project will also will not create additional waste.				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
No, the proposed expansion of mining activities will not be located on or near any unique paleontological resources.				
VIII. GREENHOUSE GAS EMISSIONS: Would the project: a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
No, all equipment used at mining site meet California's CO2 emission requirements. No portable generators are used on-site.				
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact

No, all equipment used at mining site meet California's CO2 emission requirements. No portable generators are used on-site.

IX. HAZARDS AND HAZARDOUS MATERIALS: Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? ☐ ☐ ☐ ☒

No, Chemicals are not used on-site; no chemical processing occurs on-site only crushing and screening. There will be no chemical waste or pollution from the mining operation.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?. ☐ ☐ ☒ ☐

No, Equipment and vehicle maintenance is conducted in a separate location in a shop building on concrete floors. Maintenance and refueling comply with all rules and regulations implementing proper fueling procedures, fuel, and waste oil storage, and spill control measures and employee training per Cal Trans Emergency Response Plans and Procedures on file with the Inyo County Environmental Health Services (EHS). EHS is the Certified Unified Program Agency (CUPA) that oversees hazardous materials storage, use, generation, and disposal. EHS will continue to permit the project.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? ☐ ☐ ☐ ☒

No, the project site is not within ¼-mile of a school.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? ☐ ☐ ☐ ☒

No, the project is not located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? ☐ ☐ ☐ ☒

No, the project location is neither within an airport land use plan nor within 2-miles of a public/public-use airport. The nearest town is 3.5 miles away and will not result in a safety hazard for people residing or working in Keeler.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? ☐ ☐ ☐ ☒

Attachment 4

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact

No, the project will not interfere with the implementation of an adopted emergency plan.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires,? ☐ ☐ ☐ ☒

No, the proposed project location is not adjacent to any urbanized area and the surrounding area is BLM and DWP managed vacant land composed of shale, gravels, and sands.

X. HYDROLOGY AND WATER QUALITY: Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? ☐ ☐ ☐ ☒

No, water is supplied from the Cal Trans Independence Maintenance shop. Non-potable water is pumped into a water truck that is used for wetting down material and roads during mining activities. It is not anticipated that there will be any excess water from the wetting-down procedure as the sprayed water is absorbed by loose materials, or by the porous surface, or evaporates; therefore, no recycling is required or planned. Bottled water is provided for employees.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? ☐ ☐ ☒ ☐

No, water is supplied from the Independence Maintenance shop.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in a substantial erosion or siltation on- or off-site; ☐ ☐ ☒ ☐

No, the project site is composed of shale, gravels and sands. This material is very porous and there are no drainages or impervious surfaces on-site. Erosion is not a concern on-site. The mining site is required to conform to all drainage, grading, and "Best Management Practice" (BMP) requirements as set forth by the Inyo County Public Works Department, Inyo County of Inyo Environmental Health Services Department, and other associated regulatory agencies. As a result of this regulation, potential impacts are considered less than significant

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; ☐ ☐ ☒ ☐

No, the project site is composed of shale, gravels and sands. This material is very porous and there are no drainages or impervious surfaces on-site. Erosion is not a concern on-site. The mining site is required to conform to all drainage, grading, and "Best Management Practice" (BMP) requirements as set forth by the Inyo County Public Works Department, Inyo County of Inyo Environmental Health Services Department, and other associated regulatory agencies. As a result of this regulation, potential impacts are considered less than significant

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or ☐ ☐ ☐ ☒

No, the project site is composed of shale, gravels and sands. This material is very porous and there are no drainages or impervious surfaces on-site. Erosion is not an issue on-site.

Attachment 4

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
iv) impede or redirect flood flows?	☐	☐	☒	☐

No, no drainages or other water features were identified within the project site that would meet the definition of waters of the U.S. per the Clean Water Act. The project site is near an alluvial drainage to the North and Southside of the project area. The parallel unnamed alluvial drainage. are entirely outside (to the North and South) of the proposed project site.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

No, the project is in a minimal flood hazard area not known to be prone to seiche, tsunami or mudflows.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

No, the project site is composed of shale, gravels and sands. This material is very porous and there are no drainages or impervious surfaces on-site that cause the degrading of water quality.

XI. LAND USE AND PLANNING: Would the project:

a) Physically divide an established community?	☐	☐	☐	☒

No, the project borders vacant land owned by BLM, and DWP; therefore, will not divide a community.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

The proposed project is consistent with the County Zoning Ordinance designation of 'Open Space (OS). The OS designation allows mining use approved by the Bureau of Land Management accompanied by the reclamation plan approved by Inyo County under the Memorandum of understanding. Mining uses (Inyo County Code, Title 18, Section18.12.040 I). These include mining and processing of natural resources, including borrow pits. The proposed amendment consists of expanding the existing Keeler pit that is a continued mining use. The General Plan includes a policy that protects the current and future extraction of mineral resources that are important to the County's economy while minimizing impacts of this use on the public and the environment.

XII. MINERAL RESOURCES: Would the project: a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐

No, this project is the mining of a mineral; however, this mineral is in abundance in the area and mining this small deposit will not deplete the mineral resource. The Inyo County General Plan encourages such mining. The impact to this resource is minimal considering the significant quantities of it available within Inyo County.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☐

No, the project will have no impact on the resource.

XIII. NOISE: Would the project result in the: a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance,	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact

or applicable standards of other agencies?

No, although there may be some noise during operation, it will not increase the level of ambient noise in the project area above its current level, as it will continue to use the pit walls and berm to keep noise from carrying.

b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

No, although the mining operation requires the use of heavy construction equipment the nearest town is approximately 3.5 miles away.

c) For a project located within the vicinity of a private airstrip or, an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

No, the project is not located within an airport land use plan and is not within 2-miles of a public or public use airport.

XIV. POPULATION AND HOUSING: Would the project: a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒

No, the project is to expand mining. It does not include housing and is not an infrastructure improvement that would cause a population increase.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

No, the project is expansion of mining that will not result in a loss of housing units or result in the displacement of people.

XV. PUBLIC SERVICES: Would the project: a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection?	☐	☐	☐	☒

No, the project is an expansion of mining of shale, sands and gravel. It will not cause a high demand for additional services that could result in an overall loss in service provision.

Police protection?	☐	☐	☐	☒

No, the project is expansion of mining and is located within the jurisdiction of the Inyo County Sheriff. It will not cause high demand for additional services that could result in an overall loss in service provision.

Schools?	☐	☐	☐	☒

Attachment 4

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact

No, the project is an expansion of mining and is located within the Lone Pine Unified School District. It will not cause a high demand for additional services that could result in an overall loss in service provision.

Parks? ☐ ☐ ☐ ☒

No, the project is an expansion of mining. It will not cause a need for new or improved park facilities.

Other public facilities? ☐ ☐ ☐ ☒

No, the project is an expansion of mining. It will not cause a need for new or improved public facilities.

XVI. RECREATION: Would the project:
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? ☐ ☐ ☐ ☒

No, the project is an expansion of mining. It will not cause an increase of use to park and recreation facilities.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? ☐ ☐ ☐ ☒

No, the project is an expansion of mining. It does not include plans for new or an expansion of recreational facilities.

XVII. TRANSPORTATION:
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? ☐ ☐ ☐ ☒

No, the project is an expansion of a mining site. It will have no impact on adopted transportation plans, policies or programs.

b) Cooflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?. ☐ ☐ ☐ ☒

No, the project is consistent with CEQA Guidelines § 15064.3, subdivision (b). Caltrans's proposed expansion reduces the vehicle miles traveled by utilizing local resources with an average of 30 miles traveled versus a commercial material site with an average of 80 miles.

c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ☐ ☐ ☐ ☒

No, the project is an expansion of mining activities with a site enclosed by a berm with a gate. It will not cause a need for ony changes to the roads in the area.

d) Result in inadequate emergency access? ☐ ☐ ☐ ☒

No, the project is an expansion of a mining site. It will not create losses of emergency access.

XVIII. TRIBAL CULTURAL RESOURCES: Would the project:

Attachment 4

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒

No, the project site is not on Tribal lands and the project, an expansion of mining activities, consists of cinder sand and the site is completely devoid of vegetation. There are no known historical resources as defined in Section 15064.5 on the site.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

No, the proposed expansion of mining activities will not be located on Tribal land nor are there any known historical or cultural resources as defined in Section 15064.5 on the site. If cultural resources are discovered in the project area, work will be stopped and a local Tribal representative will be consulted with to determine the significance of the finding and the proper handling of the resource will be written into the Conditions of Approval for the permit.

XIX UTILITIES AND SERVICE SYSTEMS: Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒

No, all storm water received at this site will be contained on site or diverted into existing drainage channels and will not require new or an expansion of existing storm water drainage facilities.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒

Yes, the project is an expansion of mining site water use on-site is utilized to minimize dust generation. Water is supplied from the Independence Maintenance shop as needed and kept in a water truck on site.

c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒

No, the proposed project will not be serviced by a wastewater treatment facility.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact

the attainment of solid waste reduction goals?

No, the project is served by a county landfill that has the capacity to accommodate the project's solid waste disposal needs. All refuse is disposed of according to State and County regulation.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? ☐ ☐ ☐ ☒

Yes, the applicant will be required to comply with federal, state and local statues and regulations related to solid waste.

XX. WILDFIRE:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan? ☐ ☐ ☐ ☒

No, the project will not interfere with the implementation of an adopted emergency plan.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? ☐ ☐ ☐ ☒

No, the project site is comprised of shale, gravel, sand and the site's vegetation is sparse reduces the risk of wildfire.

c) Require the iostallation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? ☐ ☐ ☐ ☒

No, the project site is comprised of shale, gravel, sand and the site's vegetation is sparse with no structures that exacerbate fire risk.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? ☐ ☐ ☐ ☒

No, the project site is approximately 3.5 miles from Keeler and does not expose people or structures to significant risks.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population 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? ☐ ☐ ☐ ☒

Based on the information submitted by the applicant, the project does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population 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. The applicant had biological, and cultural studies prepared that found no significant impacts. Upon completion of mining activities, the site will be open space/habitat and will be resurfaced to blend in with the surrounding areas except the lower portion of the pit. It will remain available for stockpiling of natural materials, and be utilized as a staging area.

b) Does the project have impacts that are individually ☐ ☐ ☐ ☒

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				

The proposed expansion is located in a remote location and none of the impacts of this project will be cumulatively considerable.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

No, public access to the site will be restricted by a locked access gates to the mine site. The reclaimed 3H:1V slopes will be of sufficient low gradient as not to cause a hazard to public safety if the public illegally trespasses onto the site past the gate and signs

Attachment 4

Attachment 4

AMENDMENT REC 96-12 CALTRANS KEELER

Attachment 4

AMENDMENT REC 96-12 CALTRANS KEELER

Attachment 5

State of California
DEPARTMENT OF TRANSPORTATION

California State Transportation Agency

Memorandum

Making Conservation a California Way of Life.

To: Ben Downard
Environmental Coordinator
Local Assistance/Non-Cap Environmental
District 9

Date: May 17, 2019

File: D9/ INYO 136/ PM 15.5/ EA 09-37400
Keeler Pit Expansion/ Material Site #300

From: **DEPARTMENT OF TRANSPORTATION- District 9**
Dannique Aalbu
Environmental Planner/Biologist
District 9- Environmental

Subject: **BIOLOGICAL RESOURCES CLEARANCE MEMO**

Project Description:

The Keeler Pit Expansion (MS) #300 (Project) is located at Post Mile 15.5, approximately 2.5 miles (mi) southeast of the community of Keeler near the junction of State Route 136 and State Route 190, Inyo County, California. The California Department of Transportation (Caltrans) has an existing highway easement deed on the Bureau of Land Management (BLM) land for shale mining. The Project proposes expanded mining operations at Keeler Pit MS #300 for continued maintenance of dirt shoulders in Inyo County.

Approximately 300,000 cubic yards of material will be extracted from the site over a 30 to 50-year span, in an 8.1 acre-expansion area. Mining will occur in 4 phases, entailing the creation of a dirt access road and material extraction pit east and southeast of the existing pit. Four to six inches of topsoil will be relocated to soil berms on the north, south and east edges of the pit. The pit will be graded to ensure stormwater containment (final slope configuration 3:1 or flatter). All equipment storage and operations will occur within the limits of the existing (lower) pit. A retention basin, to manage and contain all stormwater, will be constructed in the lower pit.

General operations for the Project include:

- Boundary staking
- Access road construction (along southwest border of site)
- Berm construction using 6 inches of topsoil
- Grading
- Material extraction
- Stockpiling of natural materials (i.e. dirt and rock)
- Reclamation (end of Phase 4)

Mobile and/or stationary equipment stored and operated for the Project include:

- Graders
- Dozers
- Loaders
- Sorting grizzlies

- Excavators

Anticipated provisions to maintain environmental compliance include:

- Berm creation and grading for management of stormwater

Project Setting:

The Project is located at the southern end of Owens River Valley on an upland mesa/bluff, at an elevation range of 1100- 1200 meters (m), with lower elevation desert washes marking the site boundaries to the north and south. A minimum 30-foot offset boundary will be demarcated with metal stakes to buffer the edge of the bluff and provide a visual cue for excavation activities. The adjacent washes have cliffside crevasses and Creosote bush (Larrea tridentate) and may provide habitat for sensitive species.

Common plant species at the Project site include: Mojave cleomella (*Cleomella obtusifolia),* desert holly saltbush (*Atriplex hymenelytra),* Annual psathyrotes *(Psathyrotes annua),* velvet turtleback (*Psathyrotes ramosissima),* pebble pincushion (*Chaenactis carphoclinia),* devel's spineflower *(Chorizanthe rigida),* broad-leaf gilia *(Aliciella latiforia),* buckwheat species (*Enogonum sp.),* wire lettuce *(Stephanomeria pauciflora),* yellow cups *(Camissonia brevipes),* desert pepperweed *(Lepidium fremontii),* white bursage *(Ambrosia dumosa),* Anderson's desert thorn *(Lycium andersonii),* scale bud *(Anisocoma acaulis),* Fiddleleaf species *(Nama sp.),* and Primrose species *(Camissonia sp.);* prickly Russian thistle *(Salsola tragus)*, an invasive species, is also present. Overall vegetation cover at the site is less than 10 percent.

Wildlife species observed in the area include: rock wren (*Salpinctes obsoletus*), common raven (*Corvus corax)*, side-blotched lizard (*Uta stansburiana*), zebra-tailed lizard *(Callisaurus draconoides)*, painted lady butterfly (*Vanessa cardui)* and cabbage white butterfly (*Pieris rapae).*

Quad (s): Keeler

Methods Used (Species Lists Attached):

X California Department of Fish and Wildlife (CDFW), California Natural Diversity Data Base (CNDDB)
X California Native Plant Society Online Inventory
X U.S. Fish and Wildlife Service (USFWS) Species List
X Bureau of Land Management (BLM), Special Status Animal and Plant Species Lists

Survey Completion Date(s):

- Focused surveys for activities covered under this biological clearance memo:
  - Rare plant survey, May 9, 2019
  - General wildlife survey, May 9, 2019
- Nesting bird survey(s) (NBS) is/are required prior to ground disturbing activities
- Additional focused surveyed are required prior to each phase of the Project

Resources Evaluated: See table below. Special-status species evaluated using a nine-quad search.

Attachment 5

Common Name *Scientific Name*	Status (rank or other listing status)	Habitat Description	Elevation Range (m)	Habitat Present (Y) or Absent (N)	Rationale
Communities					
Active Desert Dunes	CDFW Ranked Community	Active desert dunes		N	Present in nine-quad search, but no active dune communities present at site
Plants					
Ripley's aliciella *Aliciella ripleyi*	2B.3	Limestone Cliffs; Mojave Desert scrub	305 - 1955	Y	**No individuals observed during field surveys in May 2019; nearest record (CNPS) 11 mi NE in Nelson Range at 1130 m**
Darwin Mesa milk-vetch *Astragalus atratus var. mensanus*	1B.1	volcanic clay, gravelly; Great Basin scrub; Joshua tree woodland; Pinyon and juniper woodland	1320 - 2315	N	No habitat present – out of elevation range
inflated Cima milk-vetch *Astragalus cimae var. sufflatus*	1B.3	Carbonate, rocky; Great Basin scrub; Pinyon and Juniper woodland	1500 - 2075	N	No habitat present – out of elevation range
Fish Slough milk-vetch *Astragalus lentiginosus var. piscinensis*	FT	Playas (alkaline)	1130 - 1300	N	No habitat present; no documented occurrences (CNPS) near site
curved-pod milk-vetch *Astragalus mohavensis var. hemigyrus*	1B.1	Carbonate; Joshua tree woodland; Mojave Desert scrub	1250 - 1620	N	No habitat present – out of elevation range
Shockley's milk-vetch *Astragalus serenoi var. shockleyi*	2B.2	Alkaline, granite alluvium; Chenopod scrub; Great Basin Scrub; Pinyon and Juniper woodland	1500 – 2320	N	No habitat present – out of elevation range
Tidestrom's milk-vetch *Astragalus tidestromii*	2B.2	carbonate, sandy or gravely; Mojave Desert scrub	600 - 1785	Y	**No individuals observed during field surveys in May 2019; nearest record (CNPS) 12 mi SE off Saline Valley Road at 1540 m**
King's eyelash grass *Blepharidachne kingii*	2B.3	Great Basin scrub	1065 - 2135	Y	**No individuals observed during field surveys in May 2019; nearest record (CNPS) 13.5 mi SE at Talk City Hills at 1620 m**
Lincoln rockcress *Boechera lincolnensis*	2B.3; BLM_S	carbonate; Mojave Desert scrub	1100 - 2705	Y	**No individuals observed during field surveys in May 2019; nearest record (CNPS) 10 mi NE in San Lucas Canyon at 1750 m**
Inyo mariposa *Calochortus excavatus*	BLM_S	alkaline, mesic. Chenopod scrub. Meadows and seeps	1150-2000	N	No habitat present; wet areas only

Attachment 5

Panamint rock-goldenrod *Cuniculotinus gramineus*	2B.3	Carbonate, rocky; Pinyon and Juniper woodland; subalpine coniferous forest	2040 – 2900	N	No habitat present – out of elevation range
Sanicle cymopterus *Cymopterus ripleyi var. saniculoides*	1B.2	gravelly, sandy, carbonate; Mojave Desert scrub	1000 - 1600	Y	**No individuals observed during field surveys in May 2019; nearest record (CNPS) 11.5 mi SW in wash at 1150m**
Parry's monkeyflower *Diplacus parryi*	2B.3	Great Basin scrub	1200 - 2600	N	No habitat present – out of elevation range
bald daisy *Erigeron calvus*	1B.1	Great Basin scrub	unknown	Y	**No individuals observed during field surveys in May 2019; nearest record (CNPS) 9 mi NW near Dolomite at 1170 m**
limestone daisy *Erigeron uncialis var. uncialis*	1B.2	Carbonate; Great Basin scrub; Pinyon and juniper woodland; subalpine coniferous forest	1900 – 2900	N	No habitat present – out of elevation range
Alexander's buckwheat *Eriogonum alexanderae*	BLM_S	shale or gravelly; Great Basin scrub; pinyon and juniper woodland	unknown	N	Presumably out of elevation range (only 2 instances record are at high elevation); no occurrences (CNPS) near site
Wildrose Canyon buckwheat *Eriogonum eremicola*	1B.3	sandy or gravelly; Pinyon and juniper woodland; upper montane coniferous forest	2200 – 3100	N	No habitat present – out of elevation range
Pinyon Mesa buckwheat *Eriogonum mensicola*	1B.3	Rocky or gravelly; Great Basin scrub; Pinyon and Juniper woodland; upper montane coniferous forest	1800 – 2805	N	No habitat present – out of elevation range
Panamint Mountains buckwheat *Eriogonum microthecum var. panamintense*	1B.3	Rocky; Pinyon and juniper woodland; subalpine coniferous forest	1890 - 3250	N	No habitat present – out of elevation range
Limestone monkeyflower *Erythranthe calcicola*	1B.3	carbonate; talus slope; Mojave Desert scrub; woodland	915 - 2165	Y	**No individuals observed during field surveys in May 2019; nearest record (CNPS) 7 mi NE near Cerro Gordo Peak at 2670 m**
Jaeger's hesperidanthus *Hesperidanthus jaegeri*	1B.2	carbonate, rocky; Great Basin scrub; Pinyon and juniper woodland; Subalpine coniferous forest	2135 - 2800	N	No habitat present – out of elevation range
Alkali ivesia *Ivesia kingii var. kingii*	BLM_S	mesic, alkaline, clay. Great Basin scrub. Meadows and seeps. Playas	1200 – 2130	N	No habitat present – out of elevation range
Sagebrush loeflingia *Loeflingia squarrosa var. artemisiarum*	BLM_S	Sandy; desert dunes. Great Basin scrub. Sonoran Desert scrub	700 - 1615	N	No individuals observed during field surveys in May 2019; nearest record (CNPS) approximately 50 mi N at 1470 m
Panamint Mountains lupine *Lupinus magnificus var. magnificus*	1B.2	Great Basin scrub; upper montane coniferous forest	1260 – 1830	N	No habitat present – out of elevation range

Attachment 5

intermontane lupine *Lupinus pusillus var. intermontanus*	2B.3	Great basin scrub (sandy)	1220 - 2060	N	No habitat present – out of elevation range
Inyo blazing star *Mentzelia inyoensis*	BLM_S	rocky, sometimes carbonate. Great Basin scrub. Pinyon and juniper woodland	1858 - 1980	N	No habitat present – out of elevation range
Watson's oxytheca *Oxytheca watsonii*	2B.2	Sandy; Joshua tree woodland; Mojave Desert scrub	1200 - 2000	N	No habitat present – out of elevation range
Amargosa beardtongue *Penstemon fruticiformis var. amargosae*	1B.3	Mojave Desert scrub	850 - 1400	Y	**No individuals observed during field surveys in May 2019; nearest record (CNPS) in Nelson range at 1920 m**
Inyo rock daisy *Perityle inyoensis*	1B.2	Great Basin scrub; pinyon and juniper woodland; rocky carbonate cliffs	1795 – 2715	N	No habitat present – out of elevation range
Inyo phacelia *Phacelia inyoensis*	BLM_S	Meadows and seeps (alkaline)	915 - 3200	N	No habitat present; wet areas only
Bailey's greasewood *Sarcobatus baileyi*	2B.3	Alkaline, dry lakes, washes, roadsides; Chenopod scrub	1500 – 1600	N	No habitat present – out of elevation range
Owens Valley checkerbloom *Sidalcea covillei*	1B.1	alkaline, mesic; chenopod scrub; meadows and seeps	1095 - 1415	Y	**No individuals observed during field surveys in May 2019; nearest record (CNPS) at meadow complex near roadside in Owens Valley at 1200 m**
Animals					
pallid bat *Antrozous pallidus*	BLM_S; CDFW_SSC	Deserts; rocky outcrops; oak and pine forests; open farmland. Roost in caves, rock crevices, mines, hollow trees, buildings		N	No individuals or sign observed during field surveys in May 2019; potential habitat in rock crevices/cliffs lining wash adjacent to site; nearest record (CNDDB) at Dirty socks springs, on SE side of Owens Dry Lake
golden eagle *Aquila chrysaetos*	BLM_S; CDFW_fully protected; USFWS_BCC	Great basin scrub; rolling foothills, mountain areas, sage-juniper flats, and desert		N	No habitat present; nearest record (CNDDB) in upper Vermillion canyon, SE of Owens Dry Lake
Inyo Mountains slender salamander *Batrachoseps campi*	BLM_S; CDFW_SSC	Riparian scrub and woodland; talus slope; wetland; moist canyons, where surface water is present		N	No habitat present; aquatic areas only
Crotch bumble bee *Bombus crotchii*	CDFW ranked species	Coastal California east to Sierra-Cascade crest and south into Mexico; food plant genera include Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum.		Y	**A small number of Eriogonum (buckwheat) species were observed during May 2019 field survey, but no individuals (Crotch bumble bee) observed**
Swainson's hawk *Buteo swainsoni*	BLM_S; USFWS_BCC	typical habitat is open desert, grassland, or cropland containing scattered, large		N	No habitat present

		trees or small groves; roost in large trees, but will roost on ground if no trees are available			
Costa's hummingbird *Calypte costae*	USFWS_BCC	Desert washes; sage scrub; dry and open habitats with variety of perennial vegetation		N	No habitat present – requires variety in perennial vegetation
western snowy plover *Charadrius alexandrinus nivosus*	FT; CDFW_SSC	Great Basin standing waters; sand shore; wetland		N	No habitat present - needs sandy, gravelly or friable soils for nesting
mountain plover *Charadrius montanus*	BLM_S; CDFW_SSC; USFWS_BCC	Chenopod scrub and valley and foothill grassland; short grasslands, freshly plowed fields, newly sprouting grain fields, and sod farms		N	No habitat present
Townsend's big-eared bat *Corynorhinus townsendii*	BLM_S; CDFW_SSC	Mesic sites; Great Basin scrub; roosts in the open, hanging from walls and ceilings		N	No habitat present; nearest record (CNDDB) at large Dolomite mine, used for roosting
Panamint kangaroo rat *Dipodamys panamintinus panamintinus*	CDFW ranked species	Great Basin scrub; Panamint Range	1400 – 2140	N	No habitat present – out of elevation range and found only in the Panamint Range
spotted bat *Euderma maculatum*	BLM_S; CDFW_SSC	Arid deserts; grasslands; mixed conifer forests; needs rock crevices in cliff or caves for roosting		N	No individuals or sign observed during field surveys in May 2019; potential habitat in rock crevices/cliffs lining wash adjacent to site; nearest record (CNDDB) on eastern end of Owens Dry Lake, south of Keeler
desert tortoise *Gopherus agassizii*	FT; ST	Mojave Desert scrub; Sonora Desert scrub; Joshua tree woodland; occurs in almost every desert environment		N	No habitat present – requires friable soil for burrow construction; creosote bush habitat with large annual wildflower blooms preferred
yellow-breasted chat *Icteria virens*	CDFW_SSC	Riparian scrub; inhabits riparian thickets of willow near watercourses		N	No habitat present – requires riparian vegetation and water
loggerhead shrike *Lanius ludovicianus*	CDFW_SSC; USFWS_BCC	Desert wash; Mojave Desert scrub; Joshua tree woodland		N	No individuals or sign observed during field surveys in May 2019; potential habitat in desert wash adjacent to site; nearest record (CNDDB) 3 mi SE of Olancha at HWY 395/190 junction
Owens Valley vole *Microtus californicus vallicola*	BLM_S; CDFW_SSC	Meadow and seep; wetland; lush grassy ground in Owens valley		N	No habitat present
western small-footed myotis *Myotis ciliolabrum*	BLM_S	Arid wooded and bushy uplands near water; seeks cover in caves, buildings, mines and crevices		N	No individuals or sign observed during field surveys in May 2019; potential habitat in rock crevices/cliffs lining wash adjacent to site; nearest record (CNDDB)

					at springs on eastern shore of Owens Dry Lake, approx. 1.5 miles SSW of Keeler
Yuma myotis *Myotis yumanensis*	BLM_S	Lower and upper montane coniferous forest; riparian forest and woodland; near water		N	No habitat present
northern sagebrush lizard *Sceloporus graciosus graciosus*	BLM_S	mountainous sagebrush and shrublands; prefers exposed areas with scattered low-growing shrubs	150 – 3200	Y	**Potential habitat present - no individuals or sign observed during field surveys in May 2019; nearest record (CNDDB) 3 mi SE of Olancha at HWY 395/190 junction; preconstruction surveys will be conducted prior to implementation of each phase of work**
Owens tui chub *Siphateles bicolor snyderi*	FE; SE	Aquatic; endemic to Owens River basin		N	No habitat present
Le Conte's thrasher *Toxostoma lecontei*	CDFW_SSC; USFWS_BCC	Open desert wash, desert scrub, alkali desert scrub, and desert succulent scrub habitats; nests in dense shrub or branched cactus in desert wash		N	No individuals or sign observed during field surveys in May 2019; potential habitat in rock crevices/cliffs lining wash adjacent to site; nearest record (CNDDB) in town of Keeler approx. 2.5 mi NW of site
least Bell's vireo *Vireo bellii pusillus*	FE; SE	Riparian forest, scrub, and woodland		N	No habitat present
Mohave ground squirrel *Xerospermophilus mohavensis*	ST; BLM_S	Endemic to Mojave Desert - open desert scrub, alkali scrub, and Joshua tree woodland; also feeds in annual grasslands		N	No habitat present– species prefers sandy to gravelly soils and avoids rocky areas

Species Status Key		
FE = Federally Endangered	SE = State Endangered	CDFW_SSC = State Species of Special Concern
FT = Federally Threatened	ST = State Threatened	1.B.1-3 = CA Native Plant Society Rank. 1B plants are rare, threatened or endangered in CA and elsewhere.
USFWS_BCC = USFWS Bird of Conservation Concern	BLM_S = BLM Sensitive Species	2.B.1-1 = CA Native Plant Society Rank. 2B plants are rare, threatened or endangered in CA but more common elsewhere.

Waters of the U.S. Evaluation:
Waters of the U.S. (WOUS) do not occur within the Project limits; therefore, no WOUS will be impacted by the proposed project.

Determination:
The Project is not within the jurisdiction of NMFS (National Marine Fisheries Service) and so no NMFS species list was included.

This Project will have **No Effect** on any of the special-status species in the resources evaluated below (see attached species lists).

Avoidance Measures:

- Notify Biologist 30 days prior to ground-disturbing activities
- Focused surveys for plant and animal species that do have potential habitat at the site are required prior to each phase of the Project

Rationale:
The Project site is bordered on the west by an existing Caltrans-operated scale mining pit; the existing pit site is disturbed, intermittently noisy, and does not provide suitable habitat for special-status species. Furthermore, the presence of ground-disturbing activity may deter some special-status species from entering/using the Project site.

The Project site is bordered on the north and south by lower elevation desert washes; these washes contain cliff crevasses and substantial Mojave Desert scrub vegetation, dominated by Creosote bush (Larrea tridentate). They are important in desert environments – as they intermittently hold and transport water – and, therefore, may provide suitable habitat for special-status species. A staked 30-foot offset boundary (see *Project Setting*) is planned to buffer the edge of the bluff and ensure the washes are not impacted by Project activities.

The Project site (bluff) is dominated by scale rock and contains sparse vegetation (< 10 percent). It does not provide suitable habitat for most of the special-status species that were analyzed from the nine-quad search (see table above of *Resources Evaluated*). Of the few species that do have potential to occur at the site, none were observed during the May 2019 focused survey. With the implementation of focused surveys for special-status plant and animal species prior to ground disturbance, no impacts to special-status species are expected.

If you have any questions regarding this memo, please contact Dannique Aalbu, District Biologist, at (760)872-0763 or Dannique.aalbu@dot.ca.gov.

Dannique Aalbu
Environmental Planner/Biologist
District 9- Environmental

Attachment 5

Attachments:

USFWS – Species List_Carlsbad Fish And Wildlife Office
CDFW – CNDDB Summary Table Report (nine-quad search)
CNPS – California Native Plant Society Online Inventory (nine-quad search)
BLM – Special Status Species List

MATERIAL SITE #300

(KEELER PIT)

RECLAMATION PLAN

Mine Identification # 91-14-0051

JANUARY 27, 1997

(AMENDED – October 2020)

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

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FIGURES

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MATERIAL SITE #300 RECCLAMATION 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 84.18 acres, of which 8.1 acres will be mined in four phases. Mining operations are planned to occur over 50 to 70 years, to a depth no greater than 50 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, wildlife habitat and designated end uses.

1.1.0 APPLICANT

California State Department of Transportation (Caltrans) District 09
500 S. Main Street
Bishop, California 93514
(760) 872-0601

1.1.1 Representative

Forest Becket, Senior Transportation Planner
California State Department of Transportation (Caltrans) District 9
500 S. Main Street
Bishop, California 93514
(760) 872-0681

1.2.0 LANDOWNER

U.S. Department of the Interior
Bureau of Land Management (BLM)
300 S. Richmond Road
Ridgecrest, California 93555
(760) 384-5400

1.3.0 OPERATOR

California State Department of Transportation (Caltrans) District 09
500 S. Main Street
Bishop, California 93514
(760) 872-0601

1.4.0 LESSEE

California State Department of Transportation (Caltrans) District 09
500 S. Main Street
Bishop, California 93514
(760) 872-0601

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 State Route 136 at post-mile marker 15.5. The pit is approximately 2.6 miles southeast of the town of Keeler. (Figure 1)

1.5.1 BLM Map Application and Highway Easement Deed

Caltrans submitted a BLM Map Application in 1998 and finalized a Highway Easement Deed in 2008 (Figure 2 and Attachment B). This property is also known as Assessor's Parcel Number 31-010-19.

1.5.2 Township, Range, Section, Quadrangle
The project site is located on Keeler, California USGS 7.5' Topographic Map in Township 17 South, Range 38 East, in the eastern ½ of Section 15, MDBM. (Figure 2).

1.5.3 Latitude, Longitude
The center of the highway easement is located at latitude 36°27'30" North, longitude 117°50'30" West.

1.5.4 Claim Descriptions
This project site is known by BLM and the County of Inyo as: Keeler Pit; State Material Site (MS) #300; Mine ID 91-14-0051. The project name used for the proposes of this document will be MS #300.

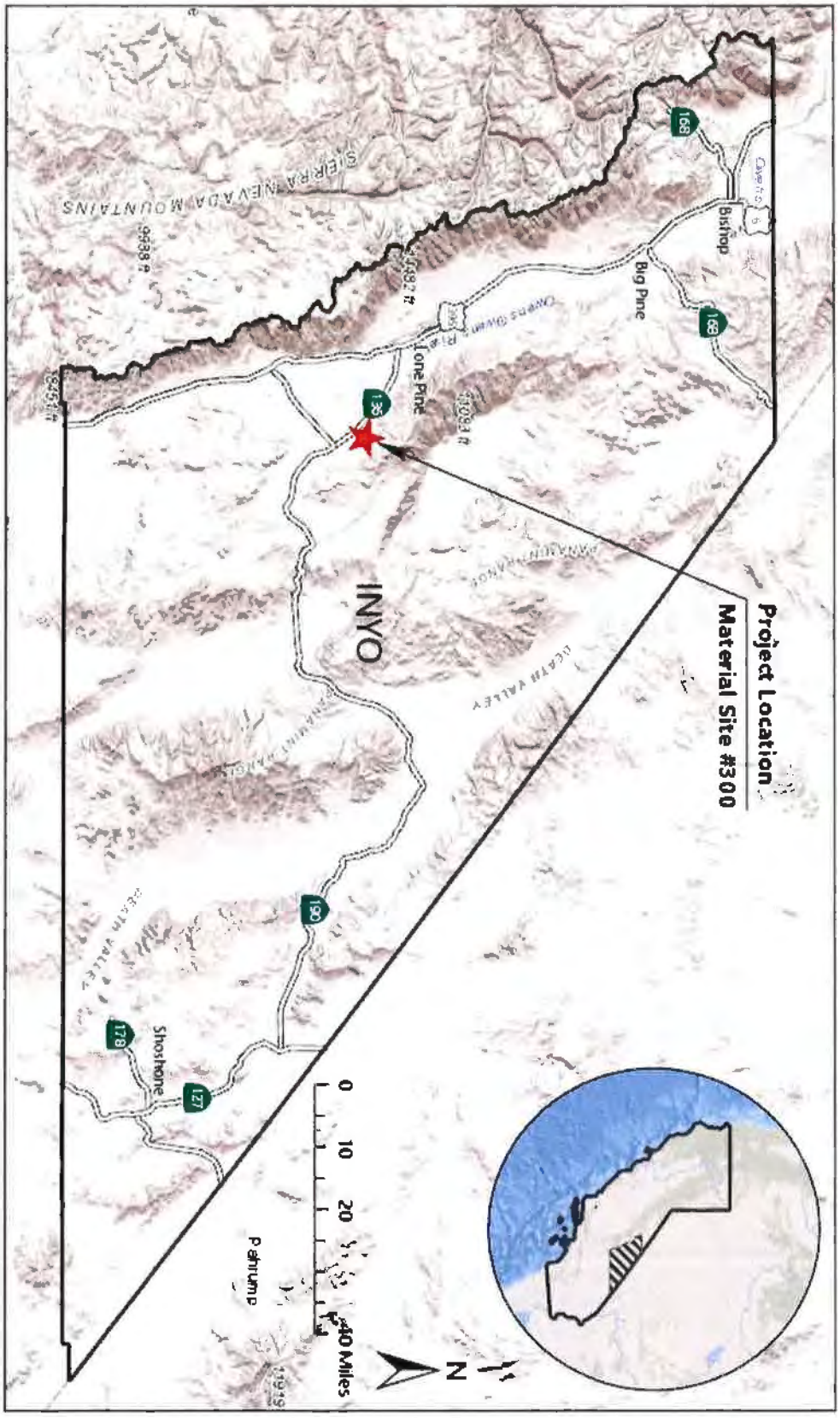
2.0.0 DESCRIPTION OF ENVIRONMENTAL SETTING

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 (Attachment C). The access to the pit from the highway is gated to control illegal dumping.

2.2.0 TOPOGRAPHIC MAP
Figure 3 depicts the site's location in the northeast portion of USGS 7.5-minute Keeler quadrangle. The proposed area to be excavated is represented on the map with a red outline.

As shown on Figure 3, MS #300 is on 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 3700 feet in the southwest producing approximately 150 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 southwest portion of the material site. The terraced area is entrenched by several large drainages which enter the site from the northeast.

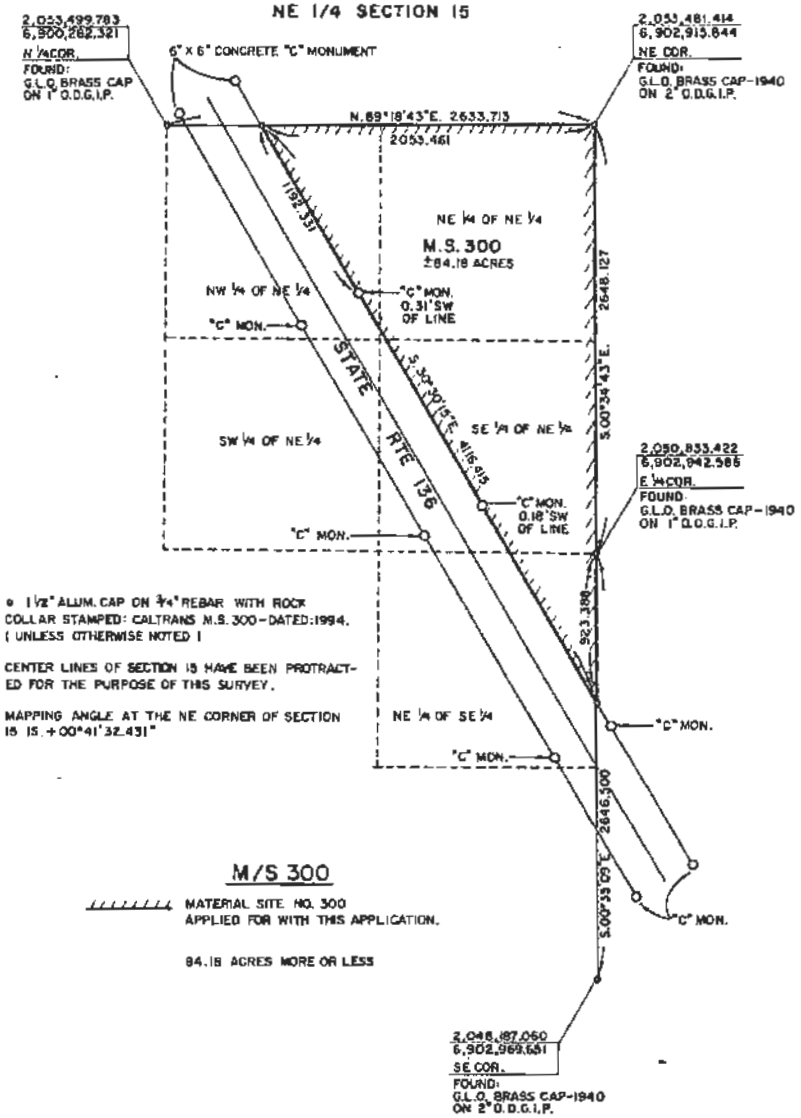
FIGURE 1 – REGIONAL LOCATION MAP OF CALTRANS MATERIAL SITE #300



Attachment 6

EXHIBIT "A"

T. 17 S., R. 38 E., M.D.M.
NE 1/4 SECTION 15



● 1½" ALUM. CAP ON ¾"ø REBAR WITH ROCK COLLAR STAMPED: CALTRANS M.S. 300 - DATED: 1994. (UNLESS OTHERWISE NOTED)

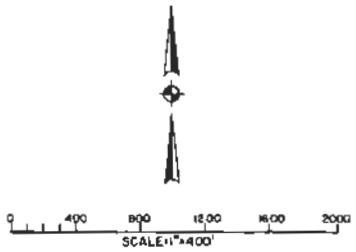
CENTER LINES OF SECTION 15 HAVE BEEN PROTRACTED FOR THE PURPOSE OF THIS SURVEY.

MAPPING ANGLE AT THE NE CORNER OF SECTION 15 IS +00°41'32.431"

M/S 300

MATERIAL SITE NO. 300 APPLIED FOR WITH THIS APPLICATION.

84.18 ACRES MORE OR LESS



CALIFORNIA COORDINATE SYSTEM (83) HPGN 1991.35 - ZONE 4
GRID BEARINGS - GRID DISTANCES IN FEET.
GRID FACTOR = 0.99977085
TO OBTAIN A GROUND DISTANCE, DIVIDE THE GRID DISTANCE BY THE GRID FACTOR.

BEARINGS AND DISTANCES SHOWN ON THIS MAP WERE DERIVED USING "GLOBAL POSITIONING SYSTEM" SURVEYING TECHNOLOGY AND ADJUSTED, USING LEAST SQUARES SOFTWARE. NO ERROR ELLIPSE (MAJOR AXIS) IS GREATER THAN 0.015 FOOT.

MONUMENTS Q 1380 (HPGN 0913) AND INDEPENDENCE NW BASE 2 (HPGN 0910) WITH NATIONAL GEODETIC SURVEYS PUBLISHED VALUES, WERE HELD AS THE BASIS FOR THIS SURVEY.

BASIS OF BEARING FOR THIS MAP IS A GRID BEARING OF S.00°34'43"E. BETWEEN FOUND MONUMENTS AT THE NE CORNER OF SECTION 15 AND E ¼ CORNER OF SECTION 15, SHOWN ON REFERENCE: U.S. GOVERNMENT PLAT APPROVED: AUGUST 20, 1969.

SURVEYOR'S STATEMENT

CHARLES ANDRUS STATES THAT HE IS BY OCCUPATION A LAND SURVEYOR EMPLOYED BY THE CALIFORNIA DEPARTMENT OF TRANSPORTATION AND THAT THE SURVEY OF THE STATE HIGHWAY MATERIAL SITE SHOWN ON THIS MAP WAS MADE BY EMPLOYEES OF SAID DEPARTMENT UNDER AUTHORITY AND THAT SUCH SURVEY IS ACCURATELY REPRESENTED ON THIS MAP.

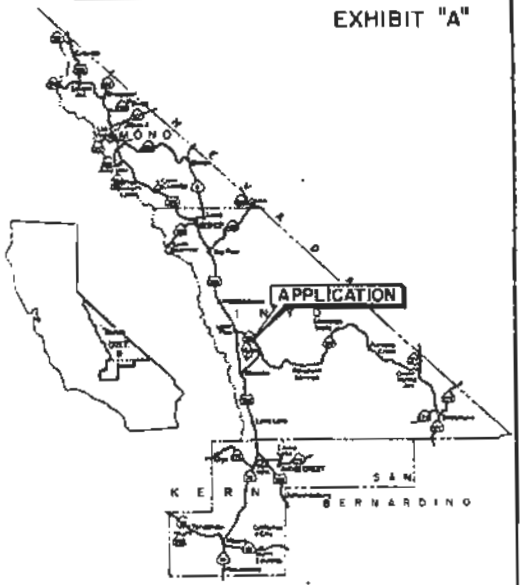
LICENSED LAND SURVEYOR — CHARLES ANDRUS — NO. 4053 — 1-6-98 — STATE OF CALIFORNIA

Charles Andrus 1-6-98
DISTRICT R/W ENGINEER — DATE
L.S. 4053

APPLICANT'S CERTIFICATE

THIS IS TO CERTIFY CHARLES ANDRUS WHO SUBSCRIBED THE STATEMENT HEREON IS THE PERSON EMPLOYED BY THE UNDERSIGNED APPLICANT TO PREPARE THIS MAP WHICH HAS BEEN ADOPTED BY THE APPLICANT AS THE FINAL LOCATION OF THE MATERIAL SITE THEREBY SHOWN AND THAT THIS MAP IS FILED AS PART OF THE COMPLETE APPLICATION, AND IN ORDER THAT THE APPLICANT MAY OBTAIN THE BENEFITS OF SECTION 317 OF THE FEDERAL HIGHWAY ACT APPROVED AUGUST 27, 1958 (72 STA. 916) AND I FURTHER CERTIFY THAT THE MATERIAL SITE HEREON DESCRIBED IS DESIRED FOR STATE HIGHWAY PURPOSES.

T. P. Hallenbeck 1-12-98
DISTRICT DIRECTOR — DATE
DEPARTMENT OF TRANSPORTATION



LOCATION MAP

MATERIAL SITE APPLIED FOR OVER AND ACROSS THE FOLLOWING UNPATENTED PUBLIC LANDS IN T. 17 S., R. 38 E., M.D.M.

NE ¼ OF NE ¼ OF SECTION 15 (WITHIN)
NW ¼ OF NE ¼ OF SECTION 15 (WITHIN)
SE ¼ OF NE ¼ OF SECTION 15 (WITHIN)
NE ¼ OF SE ¼ OF SECTION 15 (WITHIN)

FILED 3-10, 1998 IN STATE HIGHWAY MAP BOOK NO. 4 AT PAGE 12 OF THE INYO COUNTY RECORDS AT THE REQUEST OF THE CALIFORNIA DEPARTMENT OF TRANSPORTATION IN COMPLIANCE WITH SECTIONS 128 AND 129 OF THE STREETS AND HIGHWAYS CODE.

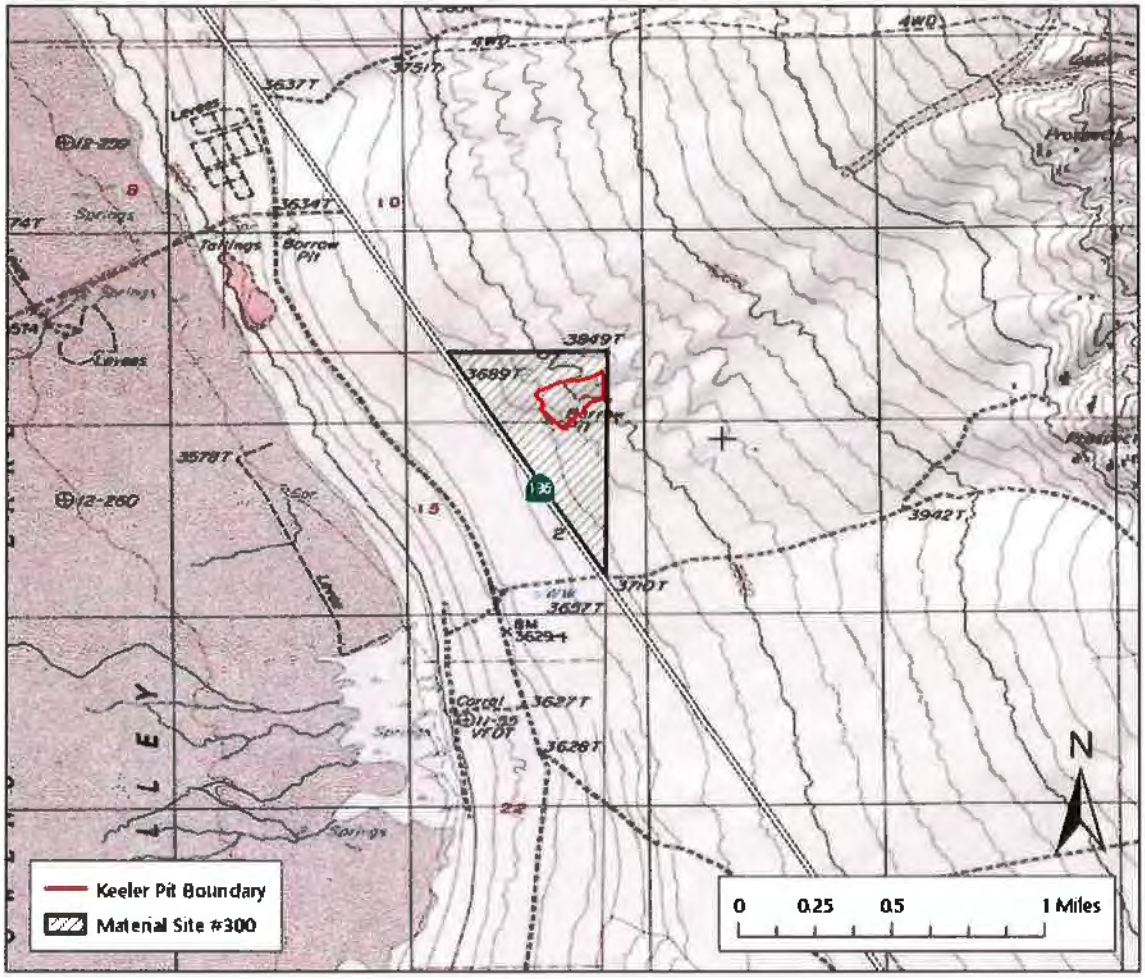
STATE OF CALIFORNIA

DEPARTMENT OF TRANSPORTATION

B. L. M. MAP APPLICATION

ONE OF ONE MAP SHEET SHOWING UNPATENTED LANDS IN T. 17 S., R. 38 E., M.D.M. EAST OF F.A.P. 136, STATE HIGHWAY 136, INYO COUNTY, P.M. 15.6 ON THE FEDERAL AID SYSTEM THROUGH WHICH A STATE HIGHWAY MATERIAL SITE AS DELINEATED IS REQUESTED IN ACCORDANCE WITH PROVISIONS OF TITLE 23 U.S.C. 317.

FIGURE 3 - TOPOGRAPHIC MAP OF PROJECT SITE



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 ¾ 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 4, Stone 2009.). 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 4). It can be deduced from 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 formation exposed in the Inyo Mountains (Figures 4 and 5).

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).

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 southwest portion of the site. The terraced material is composed of partially cemented sands and gravels representative of the older alluvial deposits. A minimum 30-foot offset boundary will be clearly demarcated with metal stakes to ensure a buffer from the edge of the bluffs and to provide a visual cue for excavation activities.

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).

FIGURE 4 - GEOLOGIC MAP OF PROJECT SITE

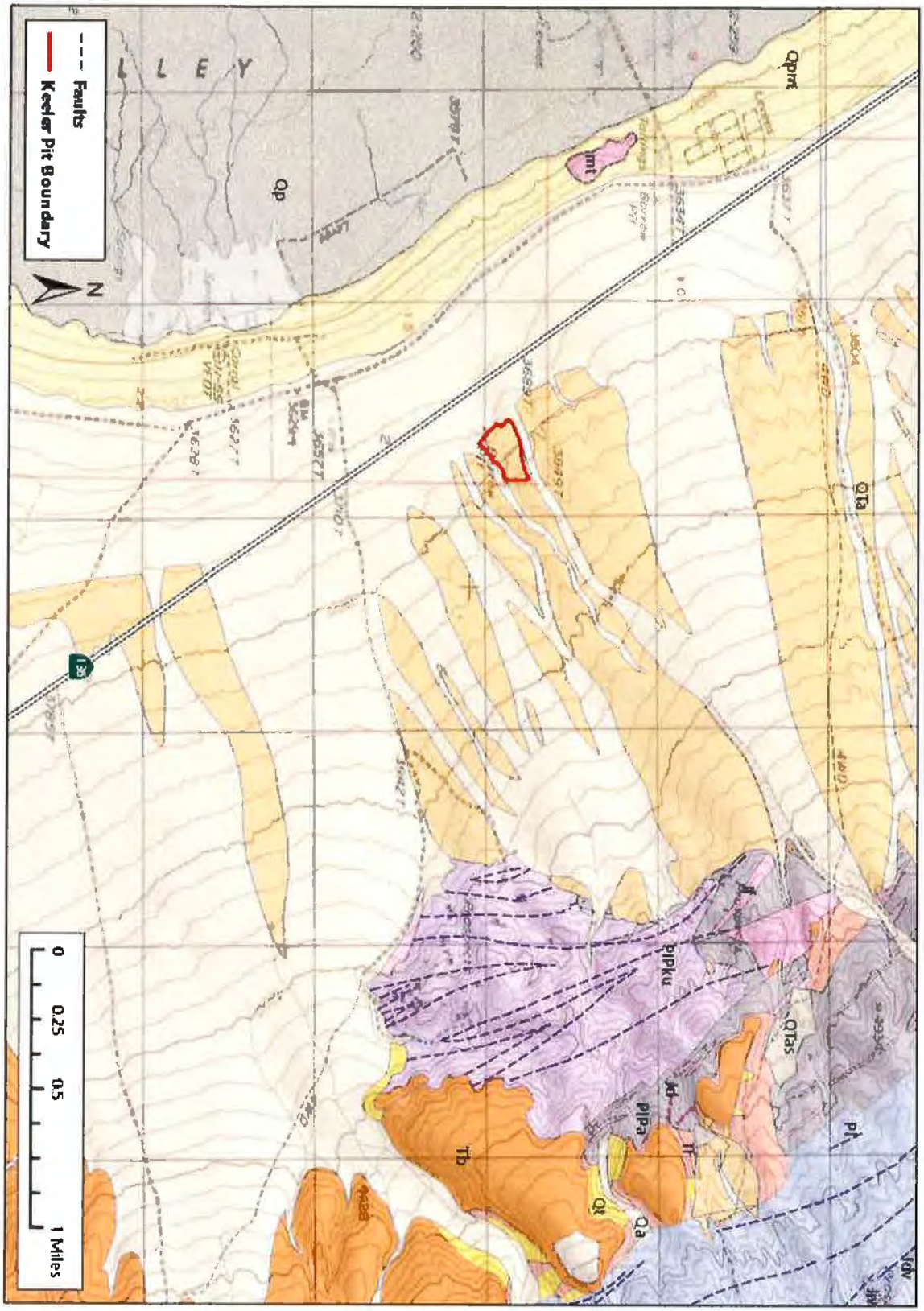
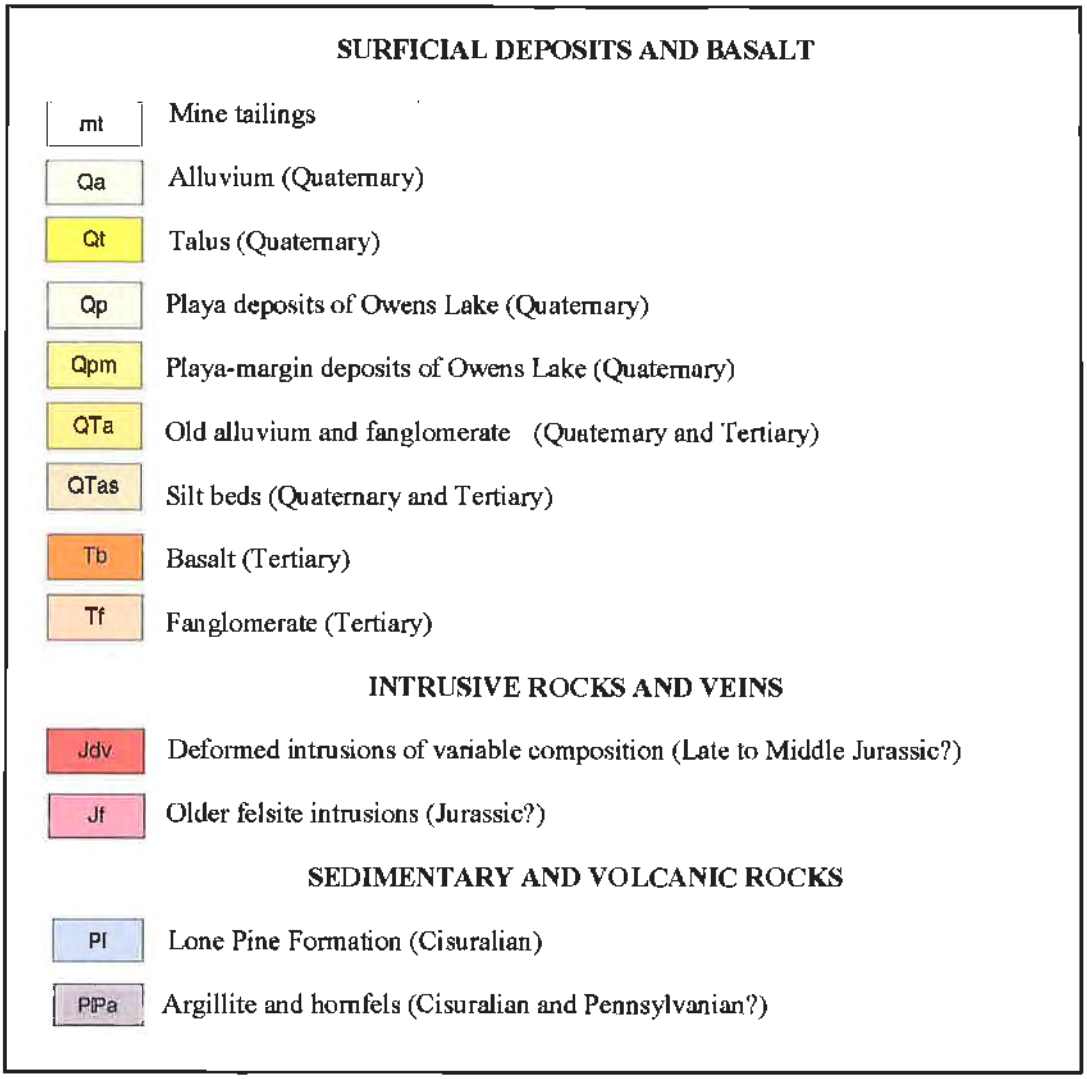


FIGURE 5 - KEY FOR GEOLOGIC MAP



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 towards Owens Lake. Only prolonged periods of moderate or heavy precipitation events produce enough runoff to offset soil infiltration rates. This 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 5.0 inches per year (Hollett 1991). Precipitation and runoff from large storm events in the region occur predominantly in the winter months.

Ground water generally follows the flow direction of the surface waters. In alluvial fan deposits, the water-table gradient is 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 6 shows the three large watersheds that feed the drainages that cross the material site. All three watersheds drain from the bed rock area in the mountains approximately six miles northeast of the site. The watershed for the drainage (Figure 6) that enters the northern half of the site, designated as Drainage 1, has an area of approximately 4,450 acres. The other watershed that enters the southeastern half of the site, Drainage 2, has an area of approximately 355 acres. The watershed for the drainage that enters the site to the south, Drainage3, has an area of approximately 1,115 acres. All three drainages typically flow only during times of intermittent, intense precipitation.

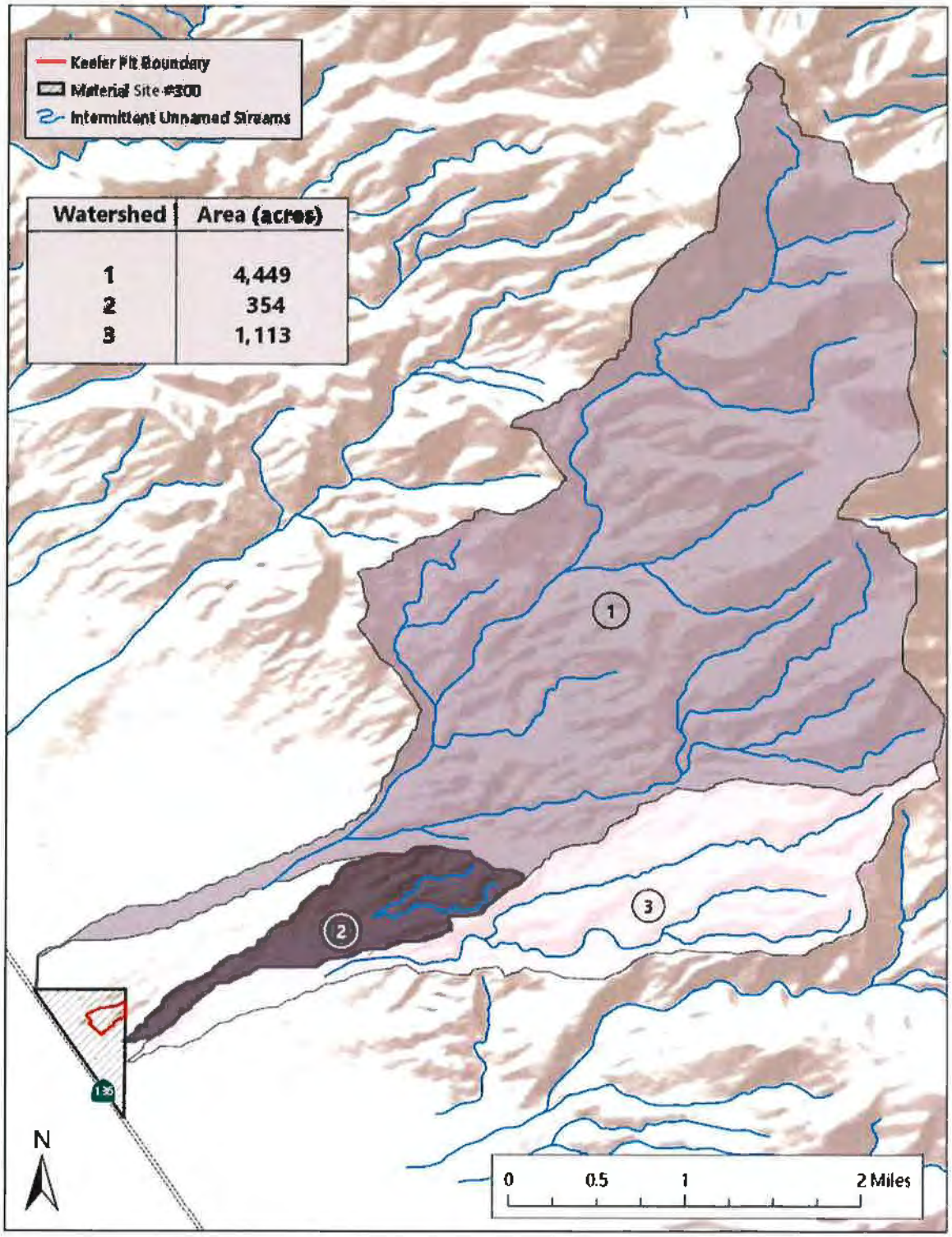
2.4.2 Area Hydrogeology

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). Along the edge of Owens Lake evaporate minerals and sand/gravel are mined by private companies and the Los Angeles Department of Water and Power (LADWP). Ground-water in the area is presently being used by the private mining companies, the community of Keeler, and LADWP.

FIGURE 6 - WATERSHED MAP OF PROJECT SITE



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.

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 7).

2.5.2 Grain-Size Analysis of Soil Samples

Soil samples were taken during the reconnaissance geotechnical survey of the site. Figure 8 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 lower 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. Evidence of native species re-establishment in disturbed areas exists on site. It is assumed that wind dispersal of seeds from the surrounding vegetation will aid in revegetation efforts.

FIGURE 7 - SOIL MAP OF PROJECT SITE

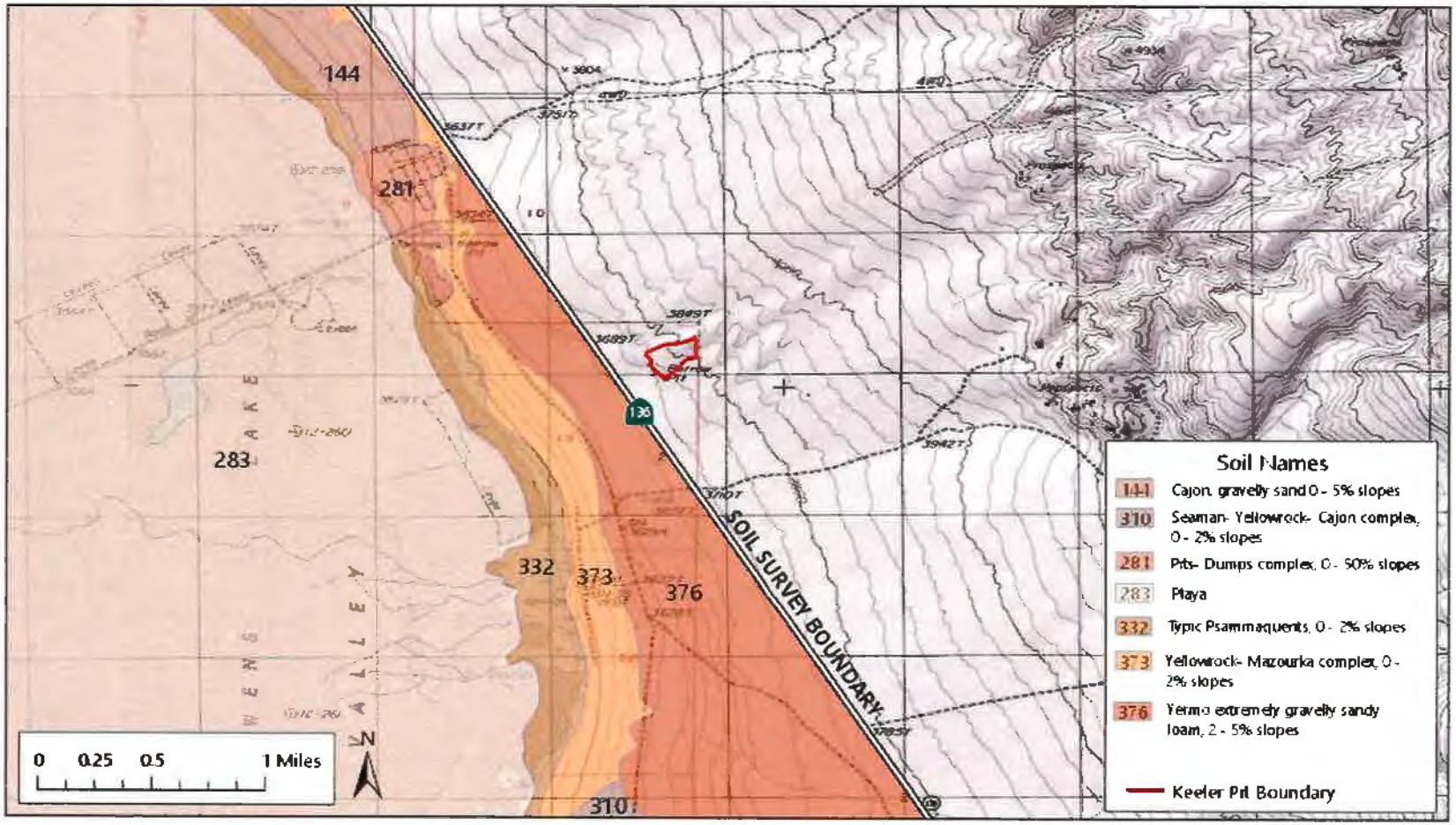
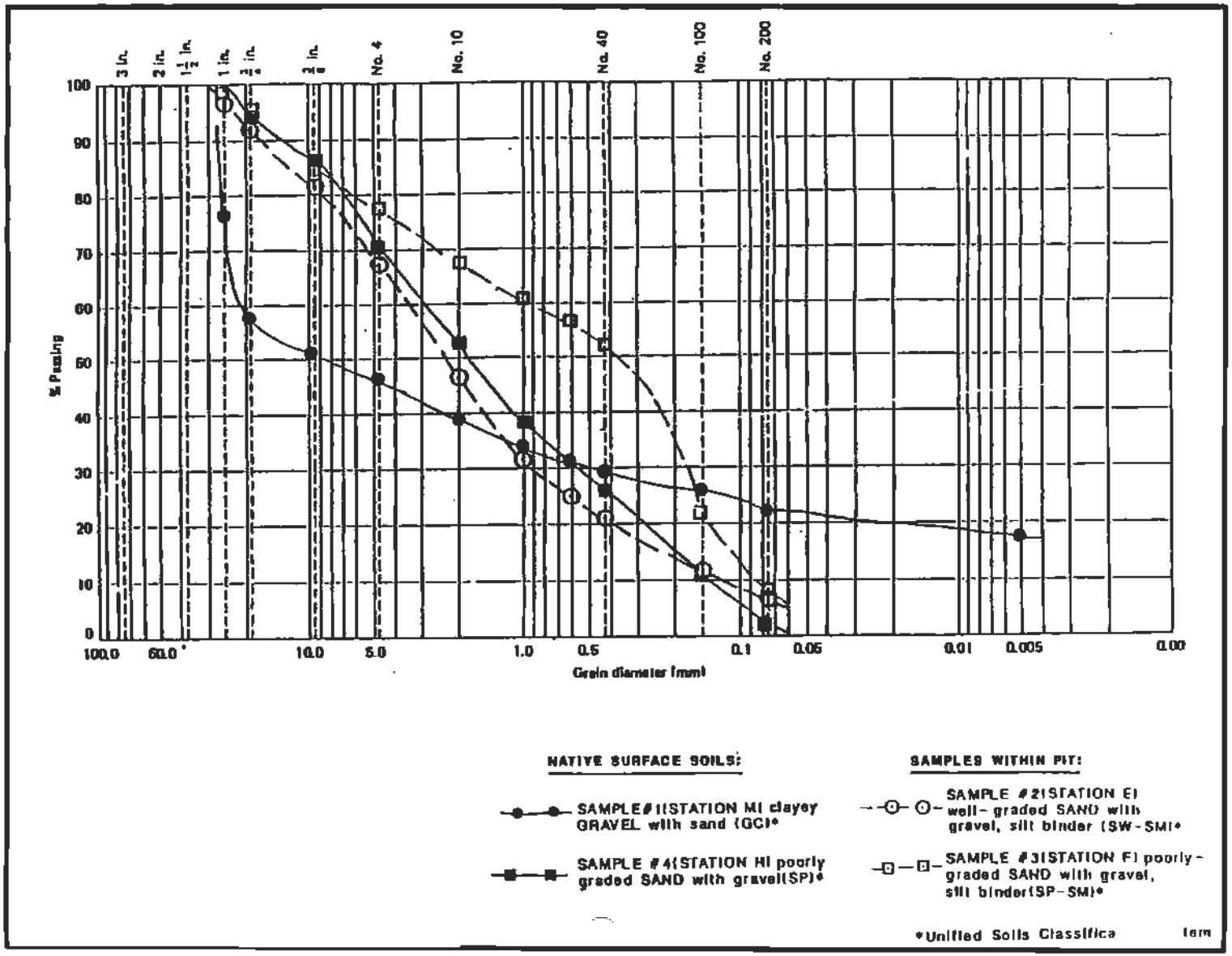


FIGURE 8 – GRAIN SIZE DISTRIBUTION CURVES



2.6.0 VEGETATION

The site was surveyed on May 9, 2019. Standard methodologies 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).

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 depauperated mixture of species, largely from the chenopod family. These species are tolerant of saline and alkaline soils.

Baseline vegetation coverage analysis was performed via aerial surveillance drone photogrammetry digital analysis in 2017 (Appendix F, Towill). Data clearly showed a very sparse vegetation coverage of 0.32% for the newly proposed mining area, with a confidence rating of 80%. Pedestrian site surveys also supported these findings.

Additional flora surveys were conducted on 8/18/2020 to gather data on species richness to address the Department of Conservation Division of Mine Reclamation comments dated 7/27/2020. Site surveys were conducted with a sample set of 50-meter belt transects, one performed in each of the three (undisturbed) newly proposed mining phase areas, and one in a revegetated test plot area, for a total of four transects. Species richness was concluded to be three species per 50 square meters in sparsely vegetated sample areas. It should be noted that sample data was taken from areas that did show vegetation, while large undisturbed areas where completely void of vegetation. See table 2.6.1 for details

2.6.2 Unique/Critical Communities

The California Natural Diversity Data Base (CNDDB 2019) and California Native Plant Society (CNPS 2019) were referenced for unique/critical plant communities for the Keeler, 7.5' Quadrangle, as well as the surround eight quadrangles. No unique or critical plant communities were observed on the mine site during the survey (Aalbu 2019).

2.6.3 Special Plant Species

According to the CNDDB (2019) and CNPS (2019), several sensitive plant species are known to occur near the mine site. Habitat for nine of these species exist on the site. The absence of rare, endangered, threatened, and sensitive plant species on this site was confirmed during the site visit (Aalbu 2019).

2.6.4 Invasive Exotics

A limited population of Russian thistle (*Salsola tragus*) exists on the mine site in disturbed locations.

2.6.5 Revegetation Potential

The Mojave Desert environment imposes severe constraints on successful revegetation with rain fall 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 cycle of cooler and more humid climatic conditions (Zedler and Ebert 1977).

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").

TABLE 2.6.1 – Plant Species Richness Survey

Keeler Pit Expansion

Flora Survey

Participants: Dannique Aalbu, Forest Becket

8.18.20 *note: some species of perennials were not identified because of lack of flowers and features. Not optimum survey timing

Test Plot: On Slope between current pit and antipated expansion area (Post-excavation test plot)

Species Observed

common name	**scientific name**
desert holly	Atriplex hymenelytra
Mojave cleomella	Cleomella obtusifolia
black greasewood	Sarcobatus vermiculatus

Plot 1: Pit Expansion Area, Phase 1		**Plot 2: Pit Expansion Area, Phase 2**		**Plot 3: Pit Expansion Area, Phase 3**	
common name	**scientific name**	**common name**	**scientific name**	**common name**	**scientific name**
desert holly	Atriplex hymenelytra	desert holly	Atriplex hymenelytra	desert holly	Atriplex hymenelytra
Mojave cleomella	Cleomella obtusifolia	spiny saltbush	Atriplex confertifolia	Mojave cleomella	Cleomella obtusifolia
rigid spiny herb	Chorizanthe rigida	rigid spiny herb	Chorizanthe rigida	rigid spiny herb	Chorizanthe rigida

Richness(N) = 3 for all plots

2.7.0 WILDLIFE

The site was surveyed on May 9, 2019. Wildlife species observed in the site area include: rock wren (*Salpinctes obsoletus*), common raven (*Corvus corax*), side-blotched lizard (*Uta stansburiana*), zebra-tailed lizard (*Callisaurus draconoides*), painted lady butterfly (*Vanessa cardui*) and cabbage white butter fly (*Pieris rapae*).

2.7.1 Description of Habitats

This site contains a native Desert Saltbush Scrub pant 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.

2.7.2 Unique/Critical Habitats

The CNNDB (2019) lists 'Active Desert Dunes' as a CDFW Ranked Community found within the nine quadrangle search. No active dune communities were present at the site(Aalbu 2019). No other unique or critical habitats were identified on the site during the site survey.

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. Approximately 80-95 percent of the total precipitation in the region falls between late October and April. Snow contributes very little, if at all, to the total at 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 5 inches per year (Hollett 1991).

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 area is typically excellent, with visibility exceeding 70 miles most of the time. However, strong dust storms occur in the region due to the exposure of erodible sediments on the valley floor. Air quality can be greatly reduced in the area of the mine site during periods of high winds.

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 (Vaughn 1980).

2.9.0 LAND USES AND AESTHETICS

MS#300 falls under BLM guidelines presented in the BLM Desert Renewable Energy Conservation Plan (DRECP), Land Use Plan Amendment (2016). This plan provides for the protection and enhancement of sensitive environmental elements in the region while allowing for resources use and development. This plan defines Conservation Management Actions (CMAs) for species and plant communities. In addition to the BLM guidelines, Inyo County classifies lands according to land-use designations.

2.9.1 Existing and Surrounding Land Uses

The site is classified as open space by Inyo County. Caltrans and BLM finalized a Highway Easement Deed in 2008 for sand and gravel material extraction (Attachment B) at MS #300. Using the website mapping tools under BLM's DRECP Site Survey Analyst (<https://drecp.databasin.org/>, June 2019) the following CMAs were identified:

TABLE 2.9.1 – BLM SPECIES / COMMUNITIES

Species / Community	CMAs	Field Survey Results
Burrowing owl *(Athene cunicularia)*	AM-RES-BLM-1	Absent
Golden eagle *(Aquila chrysaetos)*	AM-RES-BLM-1, AM-RES-BLM-ICS-9	Absent
Mohave ground squirrel *(Xerospermophilus mohavensis)*	AM-RES-BLM-1 AM-RES-BLM-ICS-14 AM-RES-BLM-ICS-15 AM-RES-BLM-ICS-16 AM-RES-BLM-ICS-17	Absent
Owens Valley checkerbloom *(Sidalcea covillei)*	AM-RES-BLM-1 AM-RES-BLM-PLANT-1	Absent
Pallid bat *(Antrozous pallidus)*	AM-RES-BLM-1	Absent
Swainson's hawk *(Buteo swainsoni)*	AM-RES-BLM-1	Absent
Townsend's big-eared bat *(Corynorhinus townsendii)*	AM-RES-BLM-1	Absent
Willow flycatcher *(Empidonax traillii extimus)*	AM-RES-BLM-1	Absent
Yellow-billed cuckoo *(Coccyzus americanus occidentalis)*	AM-RES-BLM-1	Absent
Lower Bajada and Fan Mojavean – Sonoran Desert Scrub	AM-RES-BLM-1	Absent
Shadscale – Saltbush Cool Semi-Desert Scrub	AM-RES-BLM-1	Marginal
Southwestern North American Salt Basin and High Marsh	AM-RES-BLM-1	Absent

2.9.2 Visually Sensitive Areas

Under BLM guidelines the mining site is designated VRM Class III (C, L, Fg). BLM describes the objective of the VRM Class 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 (BLM 2016)."

State Route 136 has low vehicle traffic volumes with an average of 600 vehicles a day passing the site. 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. The existing textural contract 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 through naturalization and replacement of the course ground-surface faction will integrate the site with the surround area, thereby resulting in a low level of visual change to the characteristic landscape. Reclamation will achieve visual management objectives.

The pit is only visible from State Route 136 for approximately 2,000 feet of the highway. Most motorist would only be able to see the pit and access roads for less than 25 seconds if traveling at the posted speed limit of 65 mph. There are no highway pullouts, parking areas or identified recreational staging areas within the viewshed of the pit.

3.0.0 DESCRIPTION OF PROPOSED MINING OPERATION

3.1.0 DIMENSIONS / ACREAGE

Material Site #300 occupies 84.18 acres on BLM land (Figure 2 and Appendix B). The triangular site is approximately 3800 feet, north to south, by 2300 feet, east to west, with the southeastern diagonal boundary along the highway. Approximately nine acres in the west-central portion of the site have been used for previous mining operations and access roads.

The site will be mined in four phases over a duration of 50 to 70 years. As shown on MS #300 Plan Sheets (Appendix C), the mining area will encompass approximately 8.1 acres and be 850-feet northeast to southwest and 500-feet northwest to southeast. A minimum 30-foot setback from the two large drainage channels (north and south) and BLM easement boundary will be maintained throughout all phases of mining. All mining excavation will not exceed a depth of 50-feet below the natural grade.

3.2.0 INITIATION AND TERMINATION DATES

Mining at this site will take place on an intermittent basis with mining beginning upon approval of the reclamation plan and finalization of the environmental document. The termination of mining activities at the new pit will occur after Phase IV is complete. Based on current Caltrans Maintenance material needs it would take approximately 50 to 70 years to reach the end of Phase IV.

3.3.0 PRODUCTION SCHEDULE

Caltrans Maintenance requires sand and gravel mined from this site throughout the year. Mining activities will occur in four phases, with a total estimated production volume of 373,00 cubic yards (CY). Historic mining production logs show an average use of 5,000 CY annually. Emergency road repairs due to flood and/or landslide damage can significantly increase production. Based on the last 20 years of mining this site, little to no waste is anticipated during production.

After the completion of the mining phases, final site reclamation will commence.

3.4.0 MINING PLAN

A new 8.1 acre mining pit will be established northeast of the old pit. This new site will be mined in four phases; see Appendix C and D for greater detail. The old pit will be used for material processing, stockpiling, and equipment storage. A complete description of the management of the site during idle phases, if these occur, can be found in Appendix D – Operations Plan.

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 minimized erosion and off-site sediment discharge during the mining phase. The following reclamation activities will be implemented:

Drainage Control: The old pit will continue to be self-draining. Current material berms established during operations of the old pit will be maintained. The old pit berms prevent offsite natural drainage from entering the pit, reducing slope erosion. Waste material may be used to maintain these berms. The new pit will be self-draining until completion of Phase IV, where the old pit will be the drainage catch basin for the new pit.

Topsoil Berms

At the new pit, approximately six inches of topsoil will be collected and stored in berms along the edges of the new pit. This topsoil storage will occur during phases I, II and III (Appendix C and D).

Area of Immediate Reclamation: At the end of Phase IV mining activities topsoil berms established during previous phases will be spread over the new pit slopes. The access road to the new pit will be de-compacted with the remainder of topsoil berms being spread.

3.4.2 Mining Phase

Refer to Plan Sheets (Appendix C) for the location of new pit, access roads and storage areas.

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 northeast of the old pit area and will be completed to a depth no greater than 50 feet. The old pit will be the operations area for the remainder of the mining activities at the site. Material will be stockpiled, screened, and mixed within the operations area indicated on Plan Sheets. 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. The following setbacks will be maintained during all phases of mining: 300 foot from the highway; 30 foot minimum from the bluffs associated with the two large drainage channels; 30 foot minimum from the edge of the BLM easement.

3.4.2.2 Access Road

As shown on plan sheets, access to the material site will be from State Route136 along the existing dirt access road entering the site, which is gated. An access road to the new pit will be established from the upper terrace prior mining activities.

3.4.2.3 Topsoil Handling

Topsoil shall be defined as the sop six inches of the native soil. Topsoil shall be salvaged from all areas not previously disturbed (8.1 acres). Topsoil will be stored in soil berms at the top of excavation slopes (Appendix D). 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 usable material, overburden and waste material will be stored within the operation area. Waste fines may be used in the construction of the material berms that protect the old pit. 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 offsite to areas of use. Fine-grained, non-usable material will be used for berm construction and re-soiling of the site during reclamation.

3.4.2.6 Water Impoundments and Diversions
The existing material berms at the old pit will be maintained during the mining and final reclamation phases. These berms are to prevent off-site drainage, from the two large drainage channels, into the old pit.

During phases I through III the base of the new pit will become an area of surface-water runoff accumulation for the pit area. Phase IV will re-slope the new pit to drain into the old pit.

The 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.

3.4.2.7 Test Plots for Revegetation
Final slopes in the lower (original) pit will be used as test plots during mining operations in the new phases, to inform future soil treatments and revegetation efforts. Different slope/soil preparations will be used to identify which methods best capture and propagate naturally dispersed native seed. Options for ripping, contouring, rock mulching, and topographic undulating will be experimented with to identify best practices for site specific applications.

3.5.0 PROCESSING EQUIPMENT
A portable screening operation will be moved onto the site during periods of operation, which primarily constitutes screening grizzlies, a bulldozer, and a loader. No permanent buildings or equipment will be construed 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. A water truck with pump and sprayer is used on the site during screening operations. The water truck transports water supplied from the Caltrans Independence Maintenance Yard.

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
Drinking water will only be available on the site by employees that bring their own water jugs filled from offsite sources.

3.6.3 Sewage Disposal

If needed 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 NOISE & EMISSIONS

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

3.7.1 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 and topsoil berms. 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 50 feet with noise control devices for dozers and scrapers. In combination, the noise exposure at 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 will not be perceivable against the noise generated by the mining activities.

3.7.2 Dust, Odors, Vehicular Emissions

Air quality parameters that are potentially affected by aggregate mining operations are vehicular emissions and suspended particulate (dust). Mining operations would not significantly increase vehicular traffic on SR 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 re-soiling with stockpiled topsoil mixed with native vegetative debris, will also help to control dust

A water truck will be on site during operations when high wind conditions dictate the need. Thus, the dust from the site will not add to that produced by Owens Lake and further degrade the air quality of the area.

3.8.0 HOURS OF OPERATION/NUMBER OF EMPLOYEES

The hours of operation may be up to 12 hours per day during the hours of 7:00 am to 7:00 pm. On average it is estimated that this operation will employ 2-3 people during mining activities.

3.9.0 TRANSPORTATION

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

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 provides general habitat values to various wildlife species. The new pit area will be reclaimed to open space natural resources, which will leave the site in a productive end use that is readily adaptable to alternative end uses. The old pit area will permanently be used to store natural materials for road construction and stage maintenance equipment.

4.2.0 IMPACT ON FUTURE MINING

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

4.3.0 RECLAMATION SCHEDULE

Reclamation treatments, such as topsoil berms, will be installed during the initial site reclamation phase. Reclamation treatments such as de-compaction and re-soiling will be implemented 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/sediment control, re-soiling and revegetation.

4.4.0 POST-MINING TOPOGRAPHY

Plan Sheet L-5 depicts the post-mining and reclaimed topography for the mined area. The final site configuration will, in general, be a triangular-shaped excavated pit into the alluvial fan to the northeast of the wave-cut terraces, no greater than 50-feet deep, with side slopes no steeper than 3:1 (H:V). The entry to the new pit 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 the new pit slopes. Wind dispersed seeds from the surrounding undisturbed vegetation will aid in re-vegetation efforts.

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

Plan Sheet L-5 details the final drainage plan of the reclaimed site. Material berms around the lower pit will remain in place and will be maintained throughout the life of the BLM easement.

4.4.3 Disposition of Equipment

Any equipment brought onto the new pit site will be removed following termination of mining activity. No equipment will be stored on the new pit following the end of Phase IV. Equipment may be stored in the old pit, which is consistent with the proposed end use of this portion of MS #300.

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 (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 topsoil berms at the top of the excavation slopes (Appendix C). 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.

Native surface materials will be stored in the material berms at the top of the excavation area and will be kept separate from processing and sedimentation pond fines. Native topsoil 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 old pit as shown on the site plans.

Prior to spreading the stored topsoil and fines, all compacted areas will be de-compacted (ripped or disked) to facilitate root growth. The topsoil that was stockpiled or windrowed on the sides of the pit will then be re-spread over the disturbed slopes and roughened to form a variety of microsites. This can he accomplished by rough grading, imprinting, or other suitable method.

4.6.0 REVEGETATION

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

4.6.1 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 heavy ripping the site, track walking, or by imprinting. The growth media will be prepared to provide a firm. but not overly compacted seedbed. Test plot information (see section 3.4.2.7) gathered during mining operations will be used to develop best practices for site specific preparation treatments.

4.6.2 Seed Sources

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. 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. Commercially available seeds often contain small amounts of invasive and/or exotic species. This site has only one sparsely dispersed invasive, Russian thistle (*Salsola tragus*). The introduction of other invasive/exotic species would reduce the quality of revegetation efforts. The best policy is to use seeds from on or near the site.

The first method of gathering seed would be the storing of topsoil in berms adjacent to the site. Once the berms are in place they will be left undisturbed until final reclamation activities. It is estimated that the topsoil berms will be in place for several years to decades. Native plants will continue to grow and add to the seed bank at these berms.

The second method will rely on the various wind dispersed seeds from the surrounding undisturbed landscape. Most plant species observed at the site rely on wind dispersal to propagate seeds (Aalbu 2019). The heavy roughing of slopes, similar to linear crevices at the site, would be the primary method in capturing wind dispersed seeds.

The third method of gathering seed would be harvesting by hand from the surrounding undisturbed landscape. Permission from the land owner (BLM) would be required prior to this activity. Difficulties in gathering multiple species, over several blooming season, with extremely low plant cover makes this method the least practical of the three options.

4.6.3 Seeding & Methods

Topsoil berms will be spread on slopes up to six inches deep. Slopes will be heavily roughened to mimic the linear crevices of the surround undisturbed landscape. If vegetation success criteria are not met, then hand gathered seeds 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 Mulches

Topsoil berms and existing plants growing on the berms will be the primary source of vegetative debris. The linear crevices created by roughing of the slopes will also capture wind-blown fines.

This would provide linear crevices for capture of fines, wind disbursed seeds, precipitation and minor surface runoff; mirroring existing crevices where most plant species exist at the site.

No imported mulching material will be used at this site, since it would not be compatible with the native alkaline soil types.

4.6.5 Irrigation

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 this site.

Roughing of slopes in a linear pattern that slows and gathers precipitation runoff would aid in plant establishment. Existing conditions show that the vast majority of plant cover at the site is along linear drainage crevices and at the base of slopes (Towill 2017, Appendix F).

4.6.6 Plant Protection Measures

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

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 plan sheets and revegetation plans. Material berms will be maintained at the old pit to prevent intrusive runoff and erosion from the two adjacent drainage channels. Both the new and old pit will be self-draining. Re-soiling and reseeding 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 measure 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

Except for 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 surveyed and concluded to be 0.32 % (Towill 2017, Appendix F). Reclamation will strive to achieve 0.16% (50% of baseline conditions) indigenous shrub cover. Aerial site surveys will be used to verify plant cover for the site annually during the reclamation phase. Species richness surveys conducted on the undisturbed area planned for mining showed a richness of three species per 50 square meters (see Table 2.6.1). Reclamation will also strive to achieve a species richness of three per 50 square meters.

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 were 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. Overall vegetative coverage will be calculated by use of high-quality aerial photography analysis with an 80% or greater confidence level. Species richness data will be gathered by way of 50 meter belt transects. 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 4.10.3 – Remedial Measures.

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. Data from reclamation progress will be available 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.

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.

TABLE 4.10.3 - REMEDIAL MEASURES

FEATURE	OBJECTIVES	MONITORING FREQUENCY	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. rock mulching)
Water Erosion	Soil stabilized, no evidence of riling or gullying equal to or greater than a Class 3	After first major storm event (>0.5-inch rain in a 24-hour period) following construction; annual monitoring of reclamation	Riling or gullying or erosion jndged to be excessive	Repair area; consider additional stabilization (water bars, berms, diversion channels, or rock lining)
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-your 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 by hand-pulling and hand- culling
Revegetation	Perennial density averages 0.16%	Annually following implementation	Significantly below objectives	Consider reseeding; analyze soil for problems
Re-soiling	De-compacted native soils or fines re-spread to a depth of 6 inches	Monitor during implementation	Fines absent from substrate surface or a compacted substrate	Re-spread additional fines; ripor disc site to alleviate compaction

7.0.0 REFERENCES

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APPENDICIES

A. COUNTY MINING/RECLAMATION PLAN APPLICATION

B. HIGHWAY EASEMENT DEED

C. MS #300 PLAN SHEETS

D. MS #300 OPERATIONS PLAN

E. DRECP - SITE SURVEY ANALYST

F. VEGETATION COVER MAP AND CHART

G. RECLAMATION PLAN CONTENT - CHECKLIST

APPENDIX A

COUNTY MINING/RECLAMATION PLAN APPLICATION

Attachment 6

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

Phone: (760) 878-0263
FAX: (760) 872-2712
E-Mail: inyoplanning@inyocounty.us

Planning Department Permit Application

Date: 7/25/2019	(Staff Use) Project #:

Applicant Name: Caltrans District 9 (Forest Becket)

Street Address: 500 South Main St

City: Bishop State: CA Zip: 93514

Phone: 760-872-0681 Alternate Phone: 760-872-0601

e-mail: forest.becket@dot.ca.gov

Property Owner Name: Bureau of Land Management (BLM)

Street Address: 300 S. Richmand Rd

City: Ridgecrest State: CA Zip: 93555

Phone: 760-384-5400 Alternate Phone:

e-mail:

Property Information Assessor's Parcel Number(s): 031-010-19-00

Address: N/A

Latitude: 36, 27' 30" North Longitude: 117, 50' 30" West

Section(s): 15 Township(s): 17 Range(s): 38 East, M.D.M

Zoning: Open Space General Plan Designation: SFL - Federal Lands

Project Type (Check all that apply)

- ☐ Conditional Use Permit
- ☐ Variance
- ☐ Zone Reclassification
- ☐ General Plan Amendment
- ☐ Specific Plan
- ☐ Development Agreement
- ☐ Renewable Energy Permit
- ☐ Renewable Energy Determination
- ☐ Tentative Tract Map
- ☐ Tentative Parcel Map
- ☐ Lot Line Adjustment
- ☐ Parcel Merger
- ☐ Certificate of Compliance
- ☐ Hosted Short-Term Rental
- ☐ Telecom Plan or Amendment
- ☐ Other
- ☑ Mining Reclamation Plan
- ☐ Road Abandonment
- ☐ Mohilehome Waiver
- ☐ Design Review Committee
- ☐ Time Extension
- ☐ Non-Hosted Short-Term Rental

Planning Department Permit Application

Applicant Name: Caltrans District 9 (Forest Becket)

Project Description Describe in detail Project Proposal(s). Be as specific as possible. Attach additional sheets as necessary.

This application is submitted to the County as SMARA lead agency to consider the approval of and expansion to an existing surface mine (Mine ID 91-14-0051) operated by the California Department of Transportation.

The site provides Maintenance forces with a continuous and centrally located source of shoulder backing material. Material Site #300 occupies 84.18 acres on BLM land (Figure 2 and Appendix B). The triangular site is approximately 3800 feet, north to south, by 2300 feet, east to west, with the southeastern diagonal boundary along the highway. Approximately nine acres in the west-central portion of the site have been used for previous mining operations and access roads.

The site will be mined in four phases over a duration of 50 to 70 years. As shown on MS #300 Plan Sheets (Appendix C), the expanded mining area will encompass approximately 8.1 acres and be 850-feet northeast to southwest and 500-feet northwest to southeast. A minimum 30-foot setback from the two large drainage channels (north and south) and BLM easement boundary will be maintained throughout all phases of mining. All mining excavation will not exceed a depth of 50-feet below the natural grade.

Project Goals Describe the goals and project benefits (i.e. jobs, housing, services created and revenues generated for the community, etc. Attach additional sheets as necessary.

Natural erosion and vehicular use of dirt shoulders on state highways requires continued maintenance through the replacement of dirt shoulder material. If dirt shoulders are not maintained damages to the roadway can occur during storm events and the traveling public would have difficulty using the dirt shoulder. Major storm events can also destroy whole roadway segments, requiring immediate access to aggregate materials to restore access to essential services. Inyo County's commercial sources of shoulder backing materials are limited, expensive and not ideally placed in central Inyo County. To provide Maintenance forces with a continuous and centrally located source of shoulder material, Caltrans proposes to expand mining operations at Keeler Pit (Material Site #300).

Caltrans Maintenance requires shale mined from this site throughout the year. This material is used for highway maintenance. Mining activities will occur in four phases, with a total estimated production volume of 373,00 cubic yards (CY). Historic mining production logs show an average use of 5,000 CY annually. Emergency road repairs due to flood and/or landslide damage can significantly increase production beyond average volumes. Based on the last 20 years of mining this site, little to no waste is anticipated during production.

Planning Department Permit Application

Applicant Name: Caltrans District 9 (Forest Becket)

Submission Requirements

For most types of Inyo County Planning permits have a handout available. These handouts specify the requirements for submittals for the specific permit type. Listed below are some of the most common submittals required. Please check all submittals that are being included with the application.

- [x] Site Plan
- [ ] Architectural Plans
- [ ] Parking Plan
- [ ] Lighting Plan
- [ ] Landscaping Plan
- [x] Grading and Drainage Plan
- [ ] Tentative Parcel Map
- [ ] Tentative Tract Map
- [x] Legal Description of Property
- [x] Property Deed
- [x] Title Report
- [ ] Color Renderings
- [ ] Color Chips or Materials Board
- [x] Mining Reclamation Plan
- [x] Cultural Resources Study
- [x] Biological Resources Study
- [ ] Alquist Priolo Geologic Study
- [ ] Proof of Military Notification
- [ ] List of Property Owners within 300 feet
- [ ] List of Property Owners within 1,500 feet (cannabis)

Property Owner Consent

I certify that I am the owner of the property at the project site, or am the trustee for a trust that owns the property, or an authorized officer for a legal entity that owns the property and that I consent to the submission of this application.

Name: N/A

Date:

Title:

Signature*:

Applicant Certification

I hereby attest that the information contained in this application and any attachments is correct to the best of my knowledge.

Note that if the applicant is other than the property owner, the applicant must be named as an Authorized Agent on the Consent of Property Owner and Designation of Authorized Agent form that is included with the Inyo County Planning Department Permit Application.

Name: Forest Becket

License #

Company: Caltrans

Date: 07/25/2019

Title: Senior Environmental Planner

Signature*: Forest Becket

* By signing this application the applicant/property owner agrees to defend, indemnify, and hold the County harmless from any claim, action , or proceeding arising from this application or brought to attack, set aside, void or annul the County's approval of this application, and any environmental review associated with the proposed project.

Planning Department Permit Application – Environmental Information

General Information

Applicant Name: Caltrans District 9 (Forest Becket)

Property Owner Name: Bureau of Land Management (BLM)

Address: N/A

APN: 031-010-19-00

Project Description

Property Size: 84.18 acres

Existing Buildings & Structures: None
(including Square Footage & number of Floors)

Proposed Buildings & Structures: None
(including Square Footage & number of Floors)

Project Schedule: Estimated 50 to 70 years to exhaust material at proposed 8.1 acre pit

Project Phasing: Four phases of mining with final phase including re-vegetation efforts

Provide a detailed description of the project (attach additional sheets as necessary):

- For Residential Projects, Describe, including number of units, size of units, anticipated sale prices or rental rates and type of household size anticipated
- For Commercial Projects, Describe, including type of operation, square footage of sales area and loading facilities
- For Industrial Projects, Describe, including type of operation, estimated employment per shift and number of shifts, loading facilities, truck traffic, and hazardous materials used onsite.
- For Institutional Projects, Describe, including services provided, estimated employment per shift, estimated occupancy and community benefits of project.

See attached Revised Reclamation Plan (2019), Plan Sheets (Appx. C) and Operations Plan (Appx. D).

Planning Department Permit Application – Environmental Information

Applicant Name: Caltrans District 9 (Forest Becket)

Project Checklist

		Yes	No
1.	Change in existing features of any bays, tidelands, beaches, or hills or substantial alteration of ground contours.	☑	☐
2.	Change in scenic views, or vistas from existing residential areas, public lands or roads.	☑	☐
3.	Change in pattern, scale or character of general area of project.	☐	☑
4.	Significant amounts of solid waste or litter.	☐	☑
5.	Change in dust, ash, smoke, fumes or odors in vicinity	☐	☑
6.	Change in ocean, bay, lake, stream or ground water quality or quantity, or alteration	☐	☑
7.	Of existing drainage patterns	☐	☑
8.	Substantial change in existing noise or vibration levels in the vicinity	☐	☑
9.	Site on filled land or on slope of 10 percent or more	☑	☐
10.	Use of disposal of potentially hazardous materials, such as toxic substances, flammables, or explosives.	☐	☑
11.	Substantial change in demand for municipal services (police, fire, water, sewage, etc.)	☐	☑
12.	Substantial increase in fossil fuel consumption (electricity, oil, natural gas, etc.)	☐	☑
13.	Known threatened or endangered species (animal or plant) on or near site.	☐	☑
14.	Known historical, archaeological, or cultural resource on or near site.	☐	☑
15.	Project is related to a larger project or a series of projects.	☑	☐

For all items checked **Yes**, please include a written discussion/explanation below (attach additional sheets as necessary).

#1 - Ground contours will change as a result of mining.

#2 - Mining pit is on public land and will have minor changes to visual character viewed from State Highway 136. Several other mining operations are scattered along shoreline of Owens Lake.

#9 - An existing bluff will be mined and graded during Phase IV of the project.

#15 - Previous sand and gravel mining has occurred at the site. Reclamation of this site will not preclude mining at a future date. The aggregate resource extends beyond the site boundaries and is at least 100 feet deep. The current mining plan will not have exhausted on-site mineral resources.

Planning Department Permit Application – Environmental Information

Applicant Name: Caltrans District 9 (Forest Becket)

Environmental Setting

Describe the project site as it exists before the project, including information on topography, soil stability, plants and animals and any cultural, historical, or scenic aspects. Describe any existing structures on the site, and the use of the structures. Attach photographs of the site, as needed. Attach additional sheets as necessary.

See attached Revised Reclamation Plan

Describe the surrounding properties, including information on plant and animals and any cultural, historical or scenic aspects. Indicate the type of land use (residential, commercial, etc.), intensity of land use (one family, apartment houses, shops, department stores, etc.), and scale of development (height, frontage, setback rear yard, tcc.). Attach photographs of the vicinity, as needed. Attach additional sheets as necessary.

See attached Revised Reclamation Plan

Certification

I hereby attest that the information contained in this Environmental Information Worksheet and any attachments is correct to the best of my knowledge.

Note that if the signatory of this worksheet is other than the property owner, the signatory must be named as an Authorized Agent on the Consent of Property Owner and Designation of Authorized Agent form that is included with the Inyo County Planning Department Permit Application.

Name: Forest Becket

License #

Company: Caltrans

Date: 07/25/2019

Title: Senior Environmental Planner

Signature: Forest Becket

Attachment 6

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

Phone: (760) 878-0263
FAX: (760) 872-2712
E-Mail: inyoplanning@inyocounty.us

Consent of Property Owner and Designation of Authorized Agent

Date: 7/25/2019	(Staff Use) Project #:

General Information

Property Owner Name: Bureau of Land Management (BLM)

Applicant/Authorized Agent Name: Caltrans District 9 (Forest Becket)

Project Address: N/A

APN: 031-010-19-00 Permit Type: Reclamation Plan

Consent I (we) the undersigned owner of record of the fee interest in the parcel of land identified by the address and Assessor Parcel Number(s) noted above, for which a land use permit, land division, general plan or ordinance amendment, or LAFCO application referral is being filed with the Inyo County Planning Department requesting an approval for the permit type listed above, do hereby certify that:

1. Such Application may be filed and processed with my (our) full consent.
2. I (we) hereby grant consent to Inyo County, its officers, agents, employees, independent contractors, consultants, sub-consultants and their officers, agents, and employees to enter the property identified above to conduct any and all surveys and inspections that are considered appropriate by the inspecting person or entity to process this application. This consent also extends to governmental entities other than the County, their officers, agencies, employees, independent contractors, consultants, sub-consultants, and their agents or employees if the other governmental entities are providing review, inspections and surveys to assist the County in processing this application. This consent will expire upon completion of the project.
3. If prior notice is required for entry to survey or inspect the property, please contact:

   Name: ** See attached Highway Easement Deed (Appx. B)

   Address:

   Telephone #: e-mail:

4. I (we) hereby give notice of the following concealed or unconcealed dangerous conditions on the property:

Authorization I (we) the undersigned owner of record of the fee interest in the parcel of land located at the address noted above and identified by the Assessor Parcel Number(s) noted above have authorized the person noted above as "Applicant/Authorized Agent" to act as my (our) agent in all contacts with Inyo County and to sign for all necessary permits in connection with this matter. *If the Applicant/Authorized Agent field above and the signature below are left blank it is assumed that the Property Owner will be acting as his own Agent, and no one will be acting on his behalf.*

Signatures

N/A		Forest Becket	07/25/2019
Signature of Property Owner	Date	Signature of Authorized Agent	Date

Attachment 6

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

Phone: (760) 878-0263
FAX: (760) 872-2712
E-Mail: Inyoplanning@inyocounty.us

Notification of Proximate Property Owners

Applicant Name: Caltrans District 9 (Forest Becket)

Date: 7/25/2019 | (Staff Use) Project #:

The following applications require the provision of public hearing notices to surrounding property owners within 300 feet of the boundary of the project property. Please check all that apply to this project.

- ☐ Conditional Use Permit
- ☐ Variance
- ☐ Zone Reclassification
- ☐ General Plan Amendment
- ☐ Development Agreement
- ☐ Non-Hosted Short-Term Rental
- ☐ Tentative Tract Map
- ☐ Tentative Parcel Map
- ☐ Certificate of Compliance
- ☐ Specific Plan
- ☐ Renewable Energy Determination
- ☐ Hosted Short-Term Rental (on form provided by Planning Staff)
- ☑ Mining Reclamation Plan
- ☐ Road Abandonment
- ☐ Mobilehome Waiver
- ☐ Telecom Plan or Amendment
- ☐ Renewable Energy Permit

The following applications require the provision of public hearing notices to surrounding property owners within 1,500 feet of the boundary of the project property. Please check if this applies to this project.

- ☐ Commercial Cannabis Conditional Use Permit (CUP for cultivation, retail, manufacturing or microbusiness)

- ☑ If you would like the Planning Department staff to act on your behalf to obtain the addresses of all property owners within 300' or 1,500' as applicable, and to mail the hearing notices, please select this box. Do note that staff time and expenses (stamps, etc.) will be billed against your account.
- ☐ If you would like to obtain addresses of all property owners within 300' or 1,500', as applicable, and provide the Planning Department addressed and stamped envelopes, select this box. Note that you must also provide the following to demonstrate that you have properly obtained the addresses that are in the notification radius:
  - The County assessor map(s) or GIS maps covering your project site with the 300' or 1,500' surrounding area shown outlined. This information must be obtained from the latest Assessor's roll.
  - The list of Assessor Parcel Numbers, property owners, and addresses for all properties within 300' or 1,500', as applicable, of the project site.
  - Number 10 envelopes (letter-sized) with first class postage affixed and addressed to each owner.
  - This form signed and dated at the bottom.

I hereby certify that the attached information contains all of the assessor parcel numbers from the latest Assessor's Roll under preparation of all the properties with the area described on the attached maps and within a distance of three hundred (300) feet or one thousand five hundred (1,500) feet, as applicable, from all exterior boundaries of the project property.

I certify under penalty of perjury that the foregoing is true and correct.

Forest Becket — 07/25/2019

Signature of Applicant — Date

Rev. 3/2018

Attachment 6

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

Phone: (760) 878-0263
FAX: (760) 872-2712
E-Mail: inyoplanning@inyocounty.us

Processing Fee Agreement

Date: 7/25/2019	(Staff Use) Project #:

General Information

Applicant Name: Caltrans District 9 (Forest Becket)

Property Owner Name: Bureau of Land Management (BLM)

Project Address: N/A

APN: 031-010-19-00 Permit Type: Reclamation Plan

Party Responsible for Payment of Fees (check): ☑ Applicant ☐ Property Owner

Basis of Fees

By County ordinance, Planning Department Processing Fees recover the costs of processing applications. These costs include personnel and overhead costs, as well as the cost of materials necessary to process the application. The deposit you pay is an estimate of the cost of processing the application and may not cover the entire cost for which you will ultimately be responsible.

Your initial deposit amount of $ 3,030 (see attached) will be applied toward processing your application(s). Interest does not accrue on this deposit. Monthly withdrawals against this deposit will be made based on the costs incurred in processing your application(s). Statements will be sent to you each month documenting the draws against your deposit. If the deposit reaches a balance of $400.00 or less you will be asked to make a subsequent deposit. You will be expected to deposit these additional fees within 30 days of a request for additional funds. If there is a balance remaining after reconciling the final bill, a refund check will be mailed to you within 45 days of the final closure of the project.

In order to implement the cost recovery provisions, please sign this statement indicating your agreement to the cost recovery procedure. This signed agreement is required for you application(s) to be accepted for processing. If you have questions regarding your application(s), or the billing status of your application(s), contact the **Inyo County Planning Department** at **(760) 878-0263**, and provide your project name and/or file number.

Agreement

I, the undersigned, agree to pay the Inyo County Planning Department Processing Fee, which consists of the costs, as described above, incurred by Inyo County in processing this application. Such payment will be made to the Inyo County Planning Department, P.O. Drawer L, Independence, CA 93526. I understand and agree that processing of my application will be suspended pending receipt by the Planning Department of all requested deposits. In the event of default of my obligations, I agree to pay all costs and expenses incurred by Inyo County in securing performance of this obligation, including the cost of reasonable attorneys' fees.

Signature

Forest Becket	Forest Becket	07/25/2019
Name of Responsible Party	Signature of Responsible Party	Date

Attachment 6

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

Phone: (760) 878-0263
FAX: (760) 872-2712
E-Mail: inyoplanning@inyocounty.us

Application Fee Deposits

Pre-application fees (*fee to be credited to formal application if submitted within 6 months*)	$500
Conditional Use Permit (*new or major amendment*)	$1,490
Minor Amendment to a Conditional Use Permit	$745
Variance	$1,500
Zone Reclassification	$1,450
General Plan Amendment	$1,525
Specific Plan	$3,080
Hosted Short Term Rental	$350
Non-Hosted Short Term Rental	$1,250
Telecommunications Plan	$2,460
Road Abandonment	$1,450
Certificate of Compliance	$1,000
Lot Line Adjustment	$900
Parcel Merger	$600
Parcel Map	$1,800
Parcel Map with Rezoning	$2,525
Tract Map	$2,325
Tract Map with a rezoning	$3,050
Reclamation Plan	$3,030
Reclamation Plan Amendment with Expansion	$3,030
Reclamation Plan Amendment without Expansion	$1,515
Interim Management Plan for Mine	$370
Mine Inspection Fee	$450

Rev. 3/2018

Application Fee Deposits

Categorical Exemption	$120
Initial Study	$500
Negative Declaration (*Includes Initial Study Fee*)	$600
Review of Special Environmental Studies	$970
Mitigation Monitoring and Report Program	$920
Environmental Impact Report	Estimated Cost
Special Meeting of the Planning Commission	$750 + Mileage
Time Extension	$480
Appeal of Planning Commission Action	$300
Planning Director's Interpretation	$100
Appeal of Planning Director's Interpretation to Planning Commission	$300
Mobile Home Waiver	$870
Building Permit Plan Check Fee	$50
Zoning Confirmation Letter	$50
Sign Permit	$30
Mobile Home Waiver	$870
Projects Installed without Authorization or Permits	**Double the Standard Fees**
Research Fee	Burdened Hourly Rate
Lone Pine Architectural Review Board	$200

NOTE: The above fees are a deposit only. If the cost for processing the application exceeds the amount of the deposit, the applicant will be responsible for payment of additional monies to cover the cost of processing. Upon payment of fees, all applicants must also complete and submit the Processing Fee Agreement form.

APPENDIX B

HIGHWAY EASEMENT DEED

Attachment 6

RECORDING REQUESTED BY

WHEN RECORDED MAIL TO:
California Department of Transportation
500 South Main Street
Bishop, California 93514

STATE BUSINESS - NO RECORDING FEE
(Gov. Code 27383)

BY: NANCY ESCALLIER
Field Office Chief, R/W, Central Reg.- Bishop

INYO, County Recorder
MARY A. ROPER Co Recorder Office
DOC- 2008-0001677-00
Tuesday, MAY 27, 2008 08:45:18
NFE $0.00::
Ttl Pd $0.00 Nbr-0000065595
DMO/R1/1-6

Space above this line for Recorder's Use

HIGHWAY EASEMENT DEED

THIS DEED, made this 21 day of May, 2008, by and between the UNITED STATES OF AMERICA, acting by and through the DEPARTMENT OF TRANSPORTATION, FEDERAL HIGHWAY ADMINISTRATION, hereinafter referred to as the Department, and the STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION, hereinafter referred to as the Grantee:

WITNESSETH:

WHEREAS, the Grantee has filed application under the provisions of the Act of Congress of August 27, 1958, as amended (23 U.S.C. Section 317 and/or Section 107), for the right-of-way of a highway over certain federal land in the State of California under the jurisdiction of the United States Department of the Interior, Bureau of Land Management, which land has been appropriated by the Department, and

WHEREAS, the Federal Highway Administrator, pursuant to delegation of authority from the Secretary of Transportation, has determined that an easement over the land covered by the application is reasonably necessary for a Material Site in Inyo County, and

WHEREAS, the United States Department of the Interior, acting by and through the Bureau of Land Management, in its consent to the appropriation of the federal land, has agreed to the transfer by the Department of an easement over the land to the Grantee, and

WHEREAS, the Grantee with respect to activities related to the Property, agrees that (a) no person shall, on the grounds of race, color, national origin, sex, age, disability, or religion be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to the Grantee's operations, programs, or activities conducted on the Property, (b) that the Grantee shall use said land so conveyed in compliance with all requirements imposed by or pursuant to Title VI of the Civil Rights Act of 1964 (42 U.S.C. section 2000d to 2000d-4) and all applicable civil rights provisions of other Federal statutes.

NOW THEREFORE, the Department does hereby grant to the Grantee an easement for Material Site No. 300, on, over, across, in, and upon the following described federal land in the County of Inyo, State of California:

Township 17 South, Range 38 East, M.D.M.

Section	Subdivision
15	NE1/4NE1/4 (within) NW1/4NE1/4 (within) SE1/4NE1/4 (within) NE1/4SE1/4 (within)

Containing 84.18 acres

as the land is more particularly described and shown on that one map sheet labeled Exhibit "A" which was filed in the office of the Inyo County Recorder in State Highway Map Book 4, page 98 on August 10, 1998.

This real property description has been prepared by me, or under my direction, in conformance with the Professional Land Surveyors Act.

Signature _____
Licensed Land Surveyor

Date APRIL 4, 2008

LICENSED LAND SURVEYOR
JOHN F. BEISCHEL
NO. 6461
Exp. 3-31-09
STATE OF CALIFORNIA

This transfer being subject to the following terms and conditions:

(1) Outstanding valid claims, if any, existing on the date of this grant, the Grantee shall obtain such permission as may be necessary on account of any such claims.

(2) Consistent with highway safety standards, the Grantee shall:

a. Protect and preserve soil and vegetative cover and scenic and esthetic values on the right-of-way outside of construction limits.

b. Provide for the prevention and control of soil erosion within the right-of-way and adjacent lands that might be affected by the construction, operation, or maintenance of the existing material site, and shall vegetate and keep vegetated with suitable species, all earth cut or fill slopes feasible for revegetation or other areas on which ground cover is destroyed. The Grantee shall maintain all terracing, water bars, leadoff ditches, or other preventive works that may be required to accomplish this objective. This provision shall also apply to slopes that are reshaped following slides which occur during or after construction.

(3) The Grantee shall establish no borrow, sand, or material sites; stone quarries, permanent storage areas; sites for highway operation and maintenance facilities, camps, supply depots, or disposal areas within the right-of-way; unless shown on approved construction plans, without first obtaining approval.

(4) The Grantee shall maintain the right-of-way and material site facilities to acceptable standards of repair, orderliness, neatness, sanitation, and safety.

(5) When need for the easement herein granted shall no longer exist and the area has been reasonably rehabilitated to protect the public and environment, the Grantee shall give notice of that fact to the Federal Highway Administration and the rights herein agreed shall terminate and land shall immediately revert to the full control of the United States Department of the Interior. The Grantee shall update and follow the Reclamation Plan including the necessary Bonding requirements within Inyo County for Material Pits under the Surface Mining Reclamation Act of 1975 and Associated Regulations.

(6) Use of pesticides shall comply with the applicable Federal and State laws. Pesticides shall be used only in accordance with their registered uses within limitations imposed by the Secretary of the Interior. Prior to the use of pesticides, the holder shall obtain from the authorized officer written approval of a plan showing the type and quantity of material to be used, pest(s) to be controlled, method of application, location of storage and disposal of containers, and any other information deemed necessary by the authorized officer. Emergency use of pesticides shall be approved in writing by the authorized officer prior to such use.

(7) The provisions of Title VI of the Civil rights Act of 1964 (78 Stat. 242) shall be complied with.

20080001677

APPROVED AS TO FORM:

This 14 day of April, 2008.

State of California
Department of Transportation

By: Claire P. LeFlore
Title of Attorney: Deputy Attorney, Caltrans
(Licensed to practice law in the State of California)

20080001677

IN WITNESS WHEREOF, I, Gene K. Fong, California Division Administrator, pursuant to delegations of authority from the Secretary of Transportation, the Federal Highway Administrator, by virtue of authority in me vested by law, have hereunto subscribed my name as of the day and year first above written.

UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

By _____
for GENE K. FONG
California Division Administrator

ACKNOWLEDGMENT

STATE OF CALIFORNIA

County of Sacramento

On MAY 16, 2008, before me, Lynn Whitford Notary Public
(Here insert Name and Title of the Officer)

personally appeared Vincent Mammano

who 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.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Lynn Whitford Notary Public

LYNN WHITFORD
COMM. #1569793
Notary Public - California
Sacramento County
My Comm. Expires Apr. 12, 2009

(Seal)

20080001577

In compliance with the conditions set forth in the foregoing deed, the State California, Department of Transportation, certifies, and by the acceptance of this deed, accepts the right-of-way over certain land herein described and agrees for itself, its successors and assigns forever to abide by the conditions set forth in said deed.

STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION

By _____
NANCY ESCALLIER
Field Office Chief
Right of Way
Central Region – Bishop

ACKNOWLEDGMENT

STATE OF CALIFORNIA

County of Inyo

On May 21, 2008, before me, Maureena Duran-Rojas, Notary Public
(Here insert Name and Title of the Officer)

personally appeared Nancy Escallier

who 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.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Maureena Duran-Rojas

MAUREENA DURAN-ROJAS
Commission # 1667533
Notary Public - California
Inyo County
My Comm. Expires May 16, 2010

(Seal)

APPENDIX C

MS #300 PLAN SHEETS

Attachment 6

DIST	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET NO.	TOTAL SHEETS
09	Iny	136	15.5	1	8

STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION

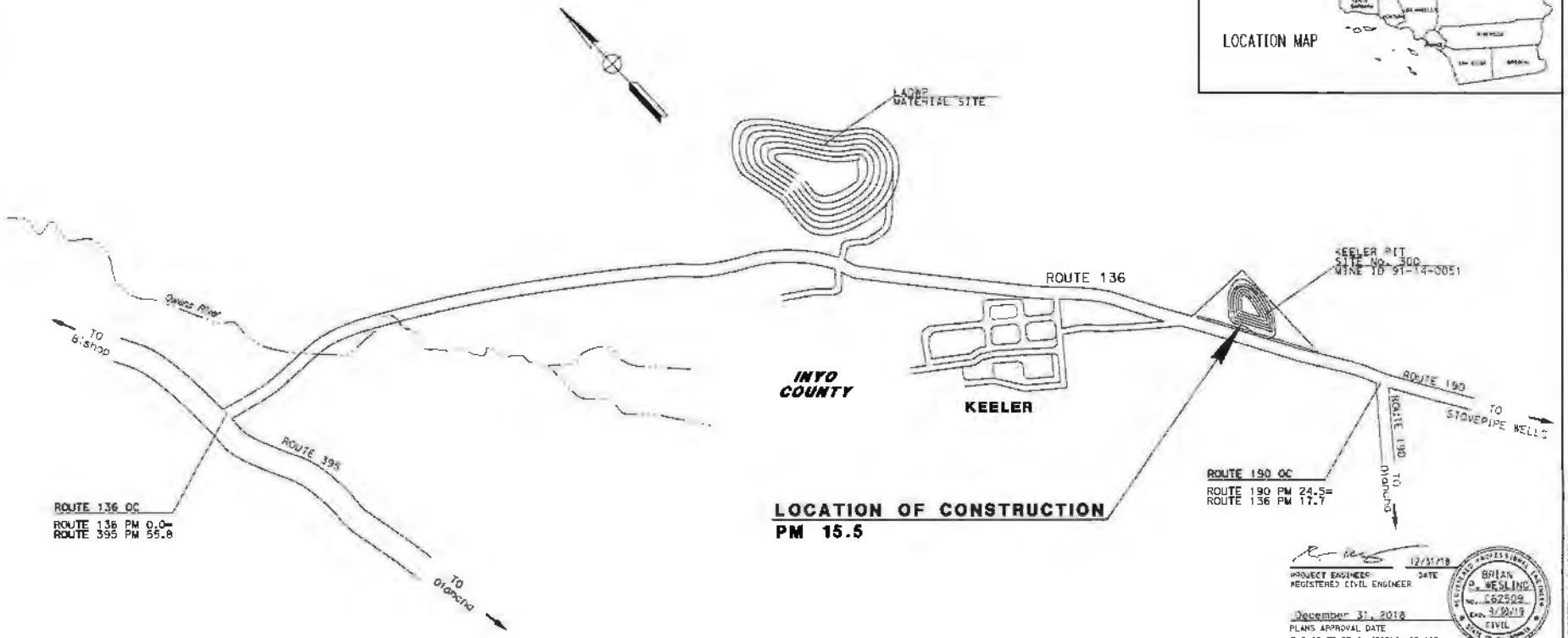
PROJECT PLANS FOR CONSTRUCTION ON
STATE HIGHWAY

IN INYO COUNTY NEAR OWENS LAKE
AT 2.6 MILES SOUTHEAST OF THE COMMUNITY OF KEELER
AT KEELER MATERIAL SITE No. 300

TO BE SUPPLEMENTED BY STANDARD PLANS DATED 2018

INDEX OF PLANS

SHEET No.	DESCRIPTION
1	TITLE AND LOCATION MAP
2-5	LAYOUT
6-7	CONSTRUCTION DETAILS



NO SCALE

THE CONTRACTOR SHALL POSSESS THE CLASS (OR CLASSES) OF LICENSE AS SPECIFIED IN THE "NOTICE TO BIDDERS."

PROJECT ENGINEER
REGISTERED CIVIL ENGINEER — DATE 12/31/18

BRIAN D. WESLING No. C62509 Exp. 3/20/19 CIVIL

December 31, 2018
PLANS APPROVAL DATE

THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF SCANNED COPIES OF THIS PLAN SHEET.

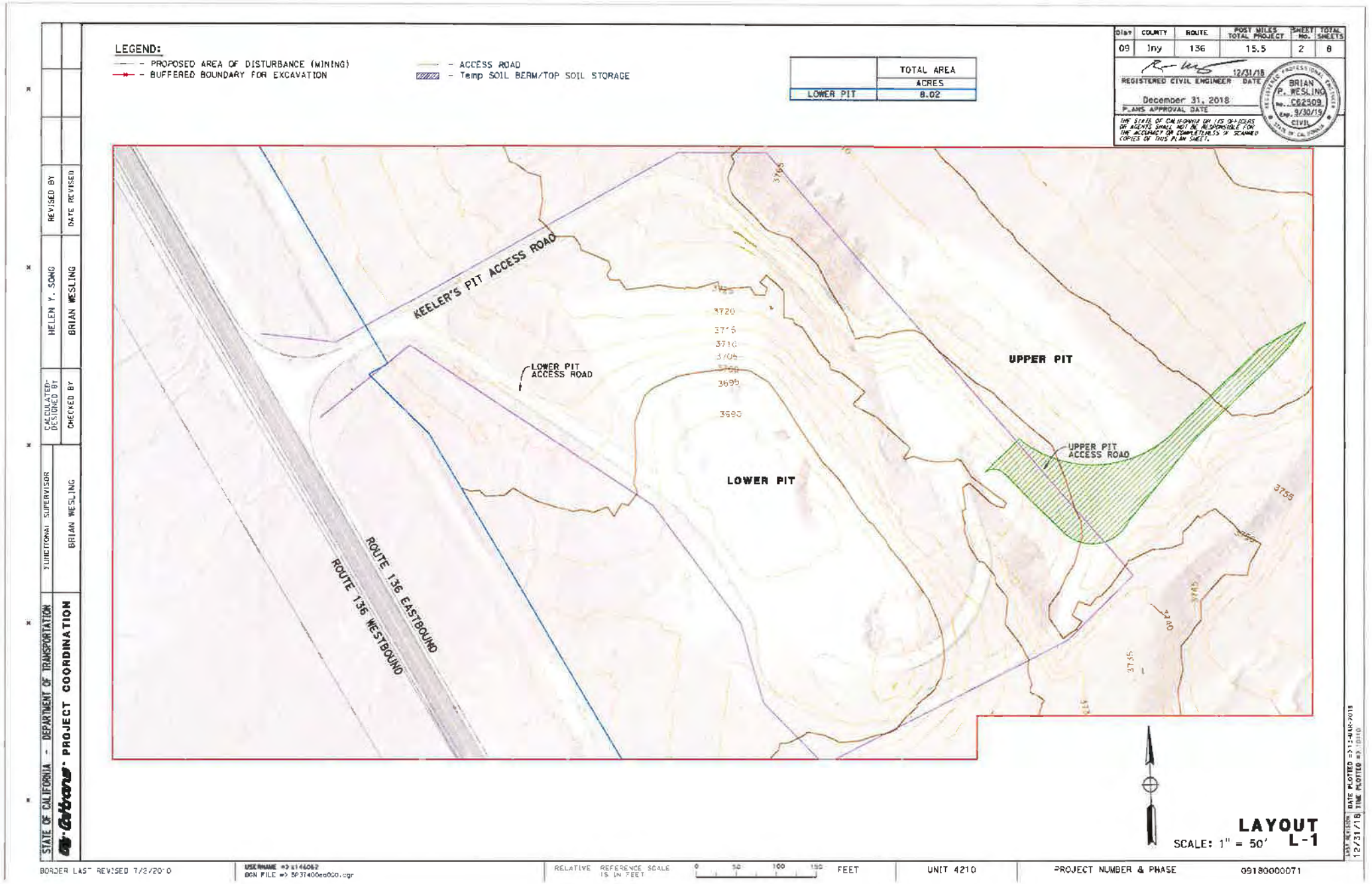
CONTRACT No.	09-374004
PROJECT ID	0918000071

DESIGN ENGINEER: BRIAN WESLING
PROJECT MANAGER: FOREST BECKET

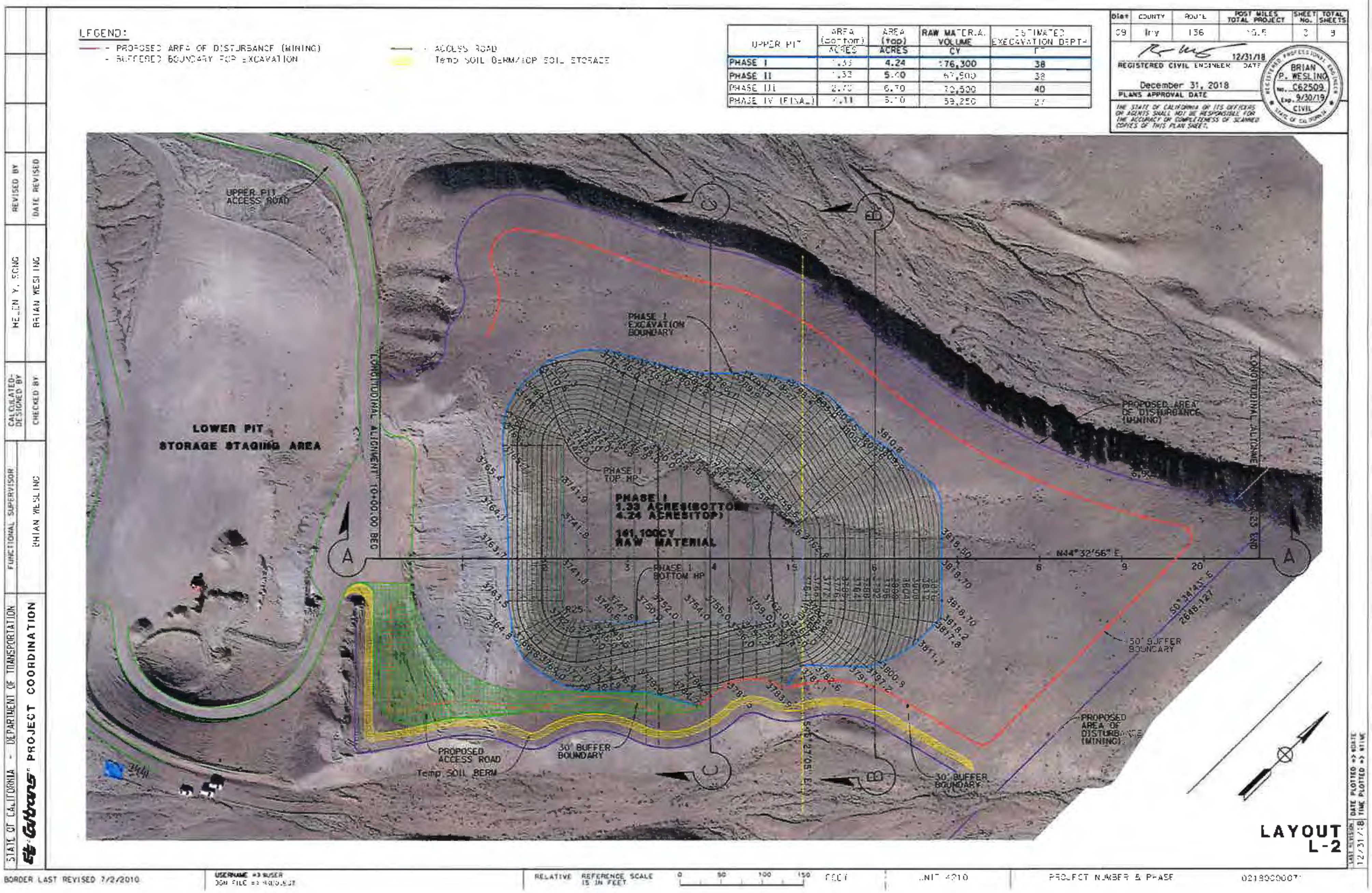
DATE PLOTTED => 12-31-18 TIME PLOTTED => 10:10:47 AM

BORDER LAST REVISED 7/2/2018 | CALTRANS WEB SITE IS: HTTP://WWW.DOT.CA.GOV/ | RELATIVE BORDER SCALE IS IN INCHES | USERNAME => DGN FILE => ...\Design\Plans\937403ab001.dgn | UNIT 2462 | PROJECT NUMBER & PHASE 0918000071

Attachment 6



Attachment 6



Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
09	Iny	136	[illegible]	2	9

UPPER PIT	AREA (bottom) ACRES	AREA (top) ACRES	RAW MATERIAL VOLUME CY	ESTIMATED EXCAVATION DEPTH FT
PHASE I	1.33	4.24	176,300	38
PHASE II	1.33	5.00	67,500	38
PHASE III	2.70	6.70	70,500	40
PHASE IV (FINAL)	[illegible]	5.70	59,250	27

Attachment 6

LEGEND:
- PROPOSED AREA OF DISTURBANCE (MINING)
- BUFFERED BOUNDARY FOR EXCAVATION
- ACCESS ROAD
- TEMP SOIL BERM/TOP SOIL STORAGE

UPPER PIT	AREA (bottom)	AREA (top)	RAW MATERIAL VOLUME	ESTIMATED EXECAVATION DEPTH
	ACRES	ACRES	CY	FT
PHASE I	1.33	4.24	176,300	38
PHASE II	1.33	5.40	67,500	38
PHASE III	2.70	6.70	70,500	40
PHASE IV (FINAL)	4.11	8.10	69,250	27

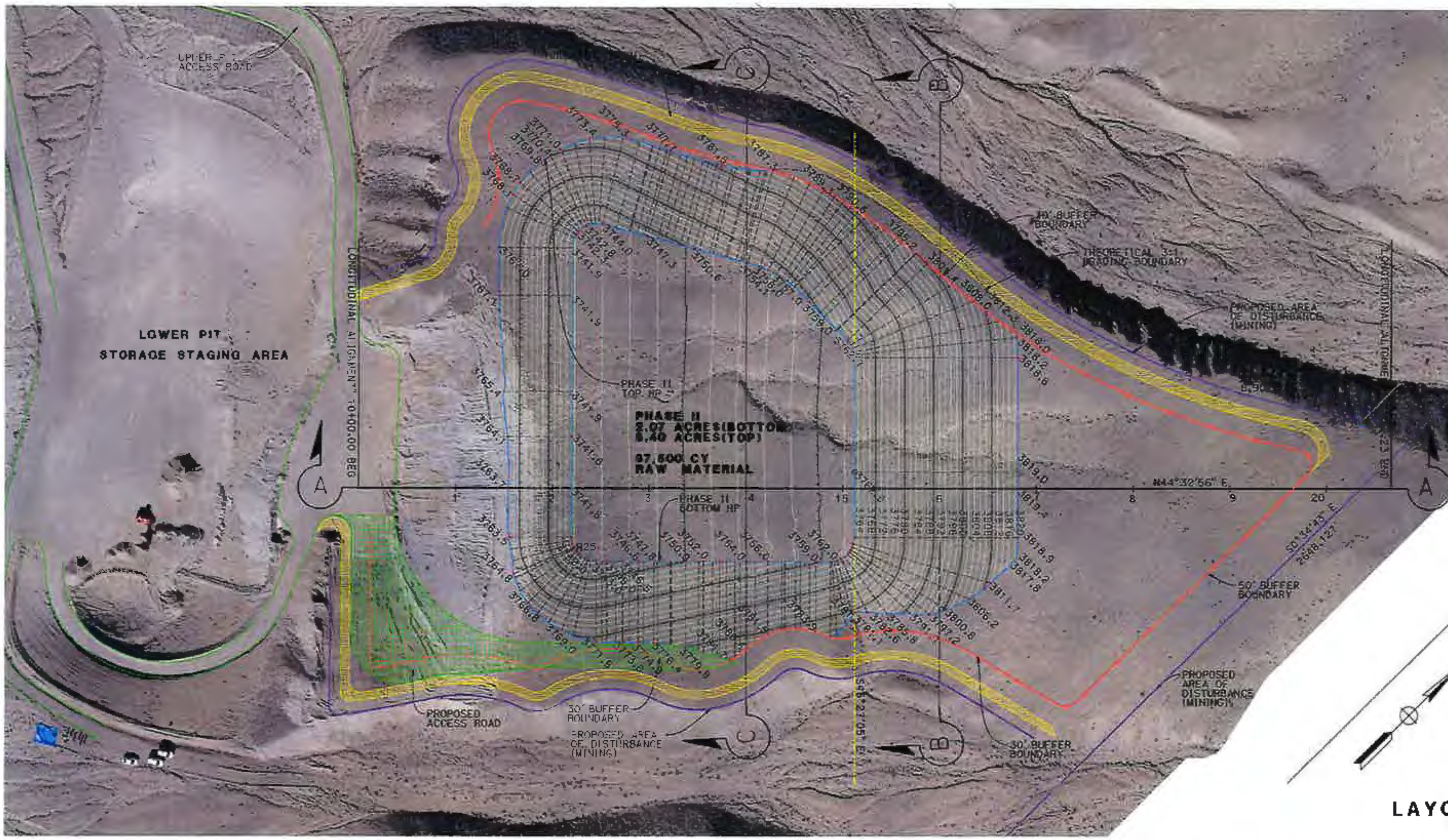
Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
09	Iny	136	15.5	4	8

REGISTERED CIVIL ENGINEER 12/31/18 DATE

December 31, 2018
PLANS APPROVAL DATE

THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF SCANNED COPIES OF THIS PLAN SHEET.

REGISTERED PROFESSIONAL ENGINEER BRIAN P. WESLING No. C62509 Exp. 9/30/19 CIVIL STATE OF CALIFORNIA



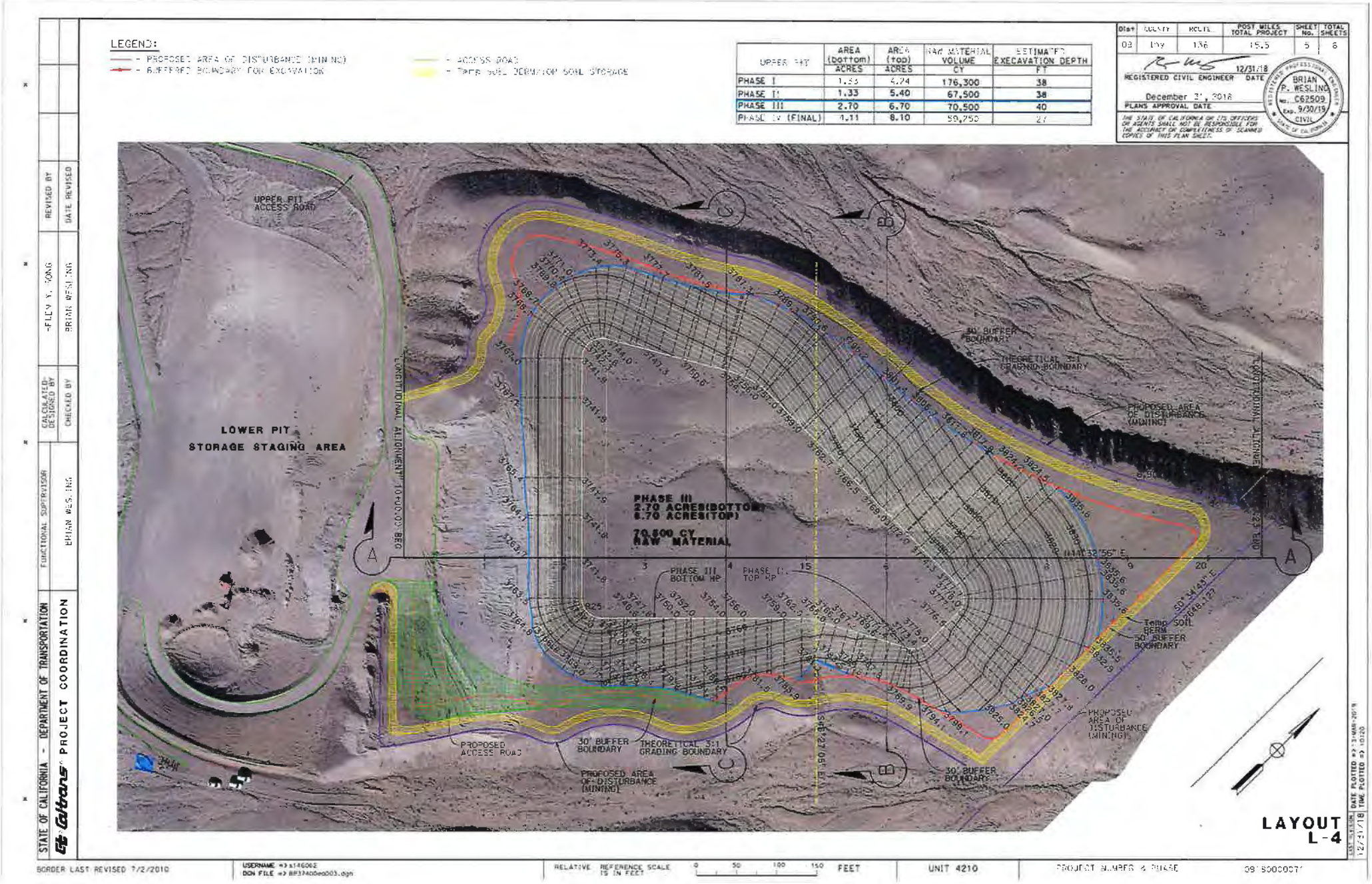
LAYOUT L-3

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION
Caltrans PROJECT COORDINATION

FUNCTIONAL SUPERVISOR: BRIAN WESLING
CALCULATED-DESIGNED BY: HELEN Y. SONG
CHECKED BY: BRIAN WESLING
REVISED BY
DATE REVISED

BORDER LAST REVISED 7/2/2010 | USERNAME => s146062 DGN FILE => 0P37400ea002.dgn | RELATIVE REFERENCE SCALE IS IN FEET 0 50 100 150 FEET | UNIT 4210 | PROJECT NUMBER & PHASE 0918000007

Attachment 6



UPPER PIT	AREA (bottom) ACRES	AREA (top) ACRES	RAW MATERIAL VOLUME CY	ESTIMATED EXCAVATION DEPTH FT
PHASE I	1.53	4.24	176,300	38
PHASE II	1.33	5.40	67,500	38
PHASE III	2.70	6.70	70,500	40
PHASE IV (FINAL)	4.11	8.10	59,750	27

Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
08	Inv	136	15.5	5	8

12/31/18
REGISTERED CIVIL ENGINEER DATE
BRIAN P. WESLING No. C62509 Exp. 9/30/19 CIVIL
December 31, 2018
PLANS APPROVAL DATE
THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF SCANNED COPIES OF THIS PLAN SHEET.

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION
Caltrans PROJECT COORDINATION
FUNCTIONAL SUPERVISOR: BRIAN WES. ING
CALCULATED/DESIGNED BY
CHECKED BY: BRIAN WESLING
REVISED BY: -FILE V. SONG
DATE REVISED

BORDER LAST REVISED 7/2/2010
USERNAME => s146062
DGN FILE => BP37406ea003.dgn
RELATIVE REFERENCE SCALE IS IN FEET 0 50 100 150 FEET
UNIT 4210
PROJECT NUMBER & PHASE 08 3000007
DATE PLOTTED => 31-MAR-2019
TIME PLOTTED => 10:20
12/31/18

Attachment 6

LEGEND:
- PROPOSED AREA OF DISTURBANCE (MINING)
- BUFFERED BOUNDARY FOR EXCAVATION
- ACCESS ROAD
- Temp SOIL BERM/TOP SOIL STORAGE

UPPER PIT	AREA (bottom)	AREA (top)	RAW MATERIAL VOLUME	ESTIMATED EXECAVATION DEPTH
	ACRES	ACRES	CY	FT
PHASE I	[illegible]	4.24	176,300	38
PHASE II	[illegible]	5.40	67,500	36
PHASE III	[illegible]	6.70	70,500	40
PHASE IV (FINAL)	4.11	[illegible]	59,250	27

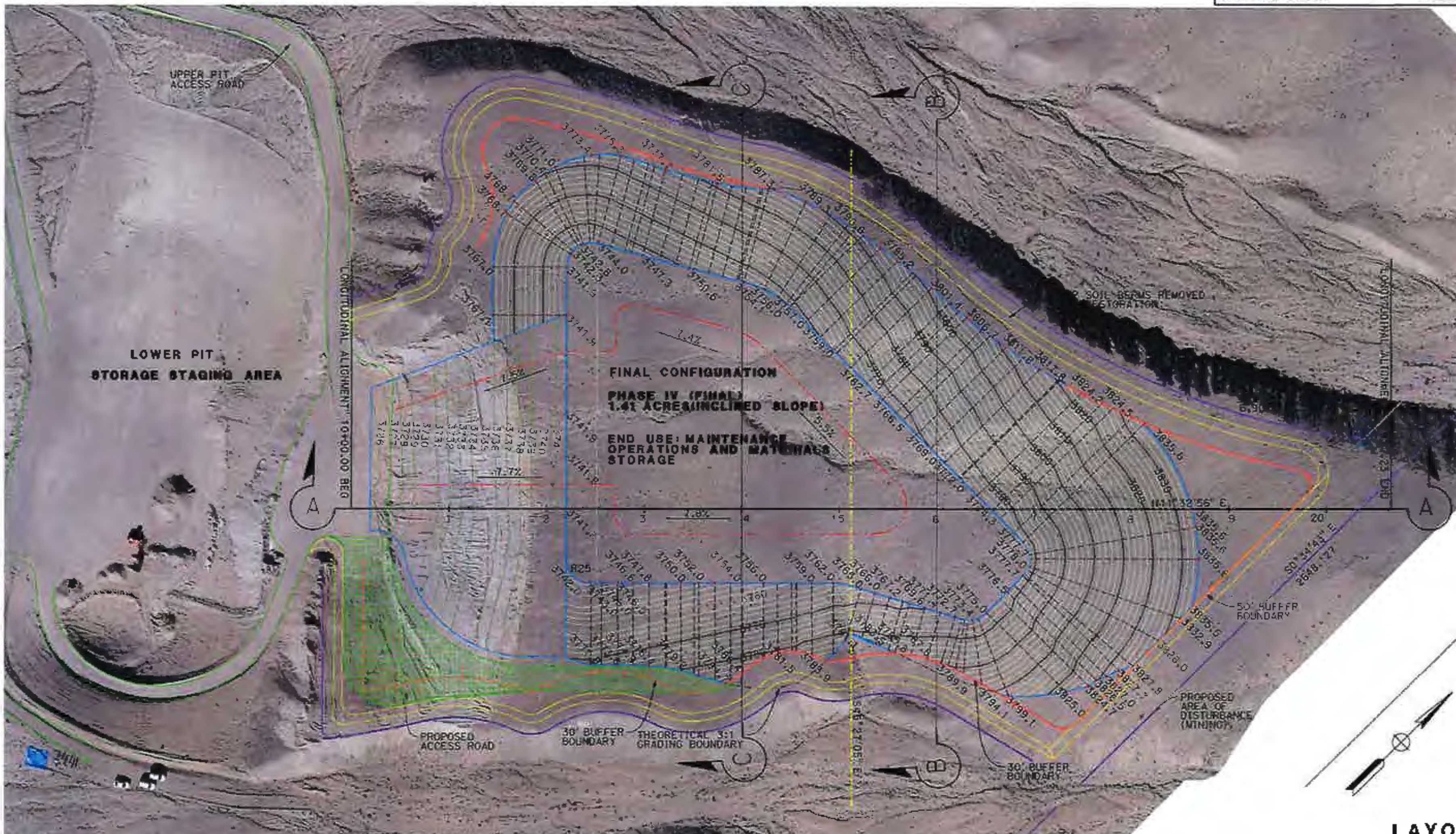
Dist	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET No.	TOTAL SHEETS
09	Iny	136	15.5	6	8

REGISTERED CIVIL ENGINEER 12/31/18 DATE

December 31, 2018
PLANS APPROVAL DATE

THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF SCANNED COPIES OF THIS PLAN SHEET.

BRIAN P. WESLING No. C62509 Exp. 9/30/19 CIVIL STATE OF CALIFORNIA

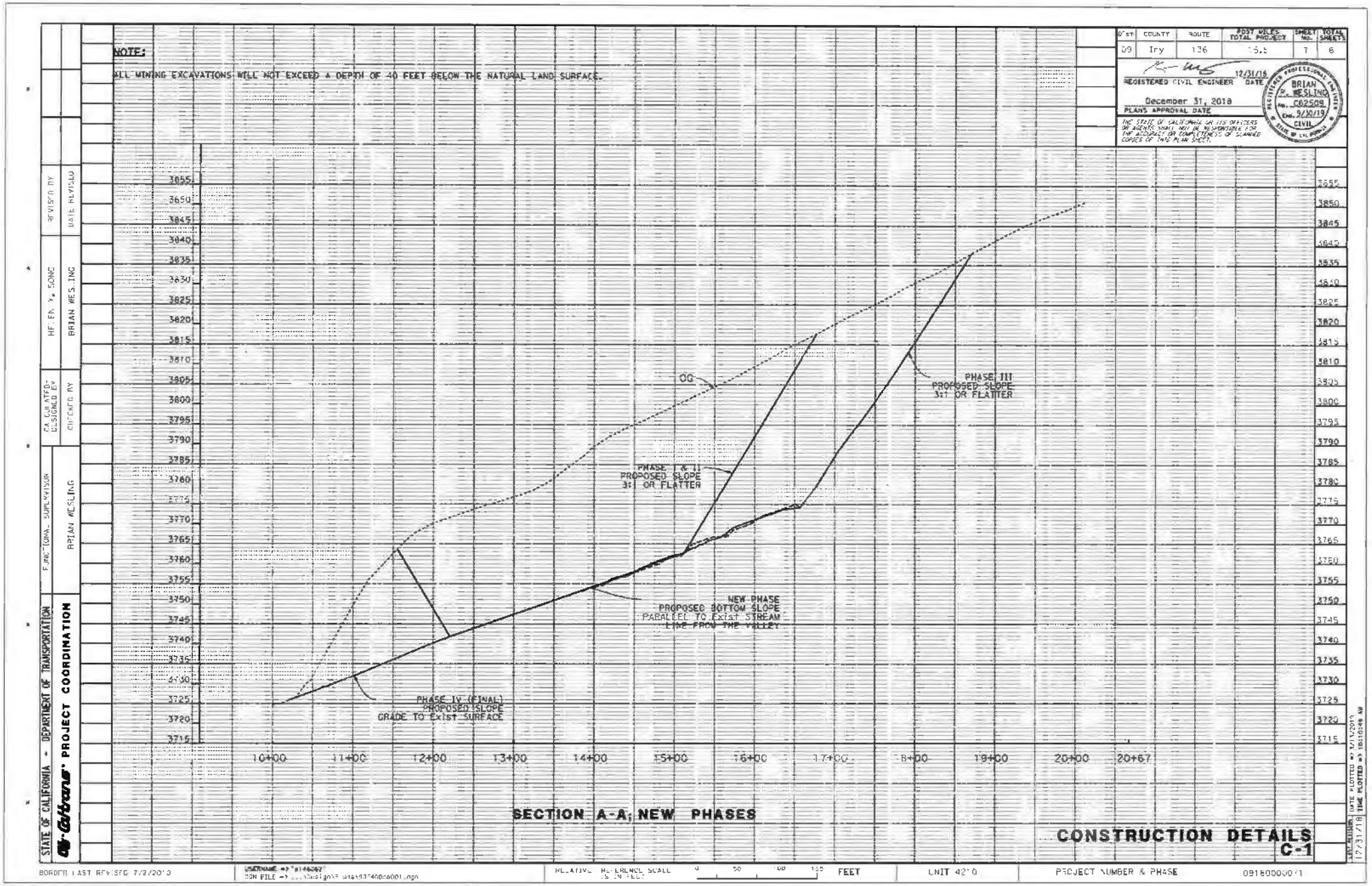


LAYOUT L-5

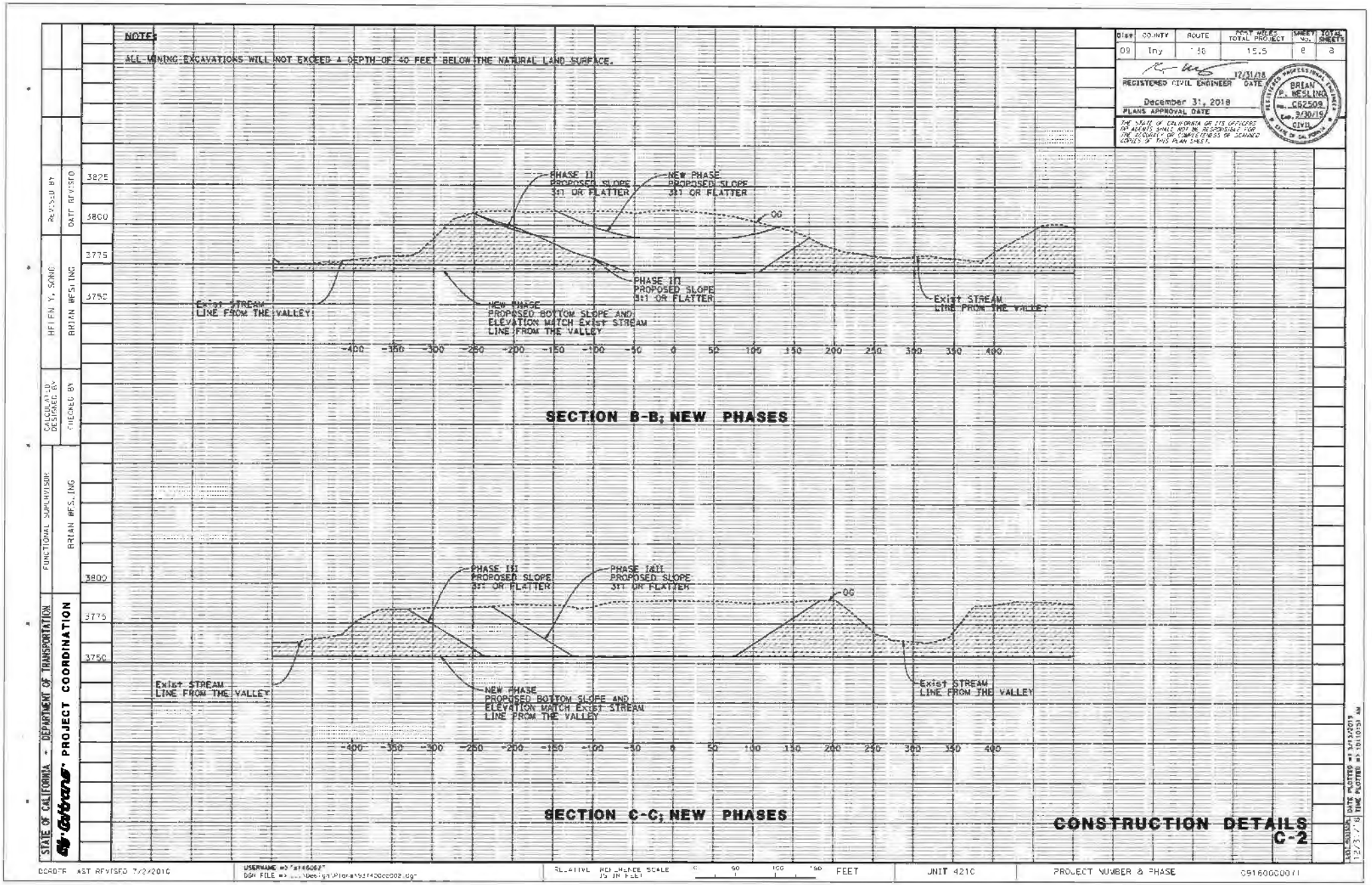
STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION
Caltrans PROJECT COORDINATION

FUNCTIONAL SUPERVISOR: BRIAN WESLING
CALCULATED-DESIGNED BY: HELEN Y. SONG
CHECKED BY: BRIAN WESLING
REVISED BY / DATE REVISED

Attachment 6



Attachment 6



APPENDIX D

MS #300 OPERATIONS PLAN

Attachment 6

MATERIAL SITE 300 (MINE ID 91-14-0051)

6/3/2019

Operations Plan / Project Description

Caltrans District 9 has an active shale mining pit at MS 300. Caltrans is proposing to expand mining operations by 8.1 acres with the approval of a new SMARA reclamation plan and associated operations plan.

Attachment 6

Material Site 300 (Mine ID 91-14-0051)

OPERATIONS PLAN / PROJECT DESCRIPTION

Background

With limited available aggregate sources statewide, including from within the Caltrans District 9 area, there is a need to thoughtfully utilize the few remaining available quality material sites. This pit is adjacent to State Route (SR) 136 and is strategically located in central Inyo County.

Maintenance has identified a need for the shale material at this location for use in highway maintenance work and utilization of the site for material storage (sand, rock, gravel, soil debris from flooding, etc.). Caltrans historic mining production logs show an average use of 5,000 cubic yards (CY) annually, which can greatly increase during big desert storm years.

There is no commercially available equivalent material in central Inyo County, which makes hauling in commercially purchased material cost prohibitive. Continued availability of this site would also avoid dependency on the uncertain supply of private commercial sources and long hauling distances.

Caltrans filed a Map Application with the Federal Highway Administration in 1998 and recorded a Highway Easement Deed with the Inyo County Recorder's office in 2008 for a material site. The site is on Bureau of Land Management (BLM) land, near Keeler California. The triangular site encompasses 84.18 acres, of which 8.1 acres will be mined in four phases, to a depth no greater than 50 feet below natural grade. The current boundary also includes a storage and operations area, to the southwest, that was the location of previous mining operations. The new site boundary has been clearly delineated with metal posts, survey markers, and material site boundary signs. Unnamed alluvial drainages to the north and south are now substantially buffered from the current mine site footprint.

The reclamation plan approved by Inyo County in 1997 approved an area of disturbance for mining of 4.8 acres, which is nearing the end of its use. This project will expand the material site for an additional 8.1 acres of minable area on top of the mesa above the existing pit. The project will update the reclamation plan to reflect this major amendment and provide all the necessary environmental analysis, engineering plans, and associated SMARA requirements. The reclamation plan amendment will also identify a new end-use of the already mined old pit as a permanent storage and staging area for Caltrans (8.02 acres).

Day One Operations (post reclamation plan and operations plan approval)

A minimum 30-foot offset boundary will be clearly demarcated with metal stakes to ensure a buffer from the edge of the bluffs and to provide a visual cue for excavation activities. A dirt access road, along the southwest border, will be established to connect the storage and operations area (lower pit) to the Phase I

mining area. Phase I area duff/topsoil, approximately six inches in depth, will be relocated to a soil berm on the southern edge of the pit and access road. The Phase I pit will be graded to ensure internal drainage.

Maintenance personnel will be trained on operations plan and methods from which to operate on the site to ensure SMARA compliance and final configurations.

General Operational Strategies

- All phases of operation will ensure that the site remains internally draining, with final slope configurations of 3 (horizontal): 1 (vertical) or flatter.
- The proposed extraction plan is not expected to encounter groundwater. The elevation of the lower pit is below the max depth elevation of the upper pit area, so groundwater should not be an issue.
- During material extraction operations, duff/topsoil (the top 4 inches) will be stockpiled for reclamation activities in soil berms at mine boundaries. Slopes will be contoured to final grade (3:1) and slope re-vegetation will commence at the end of Phase IV.
- During all mining phases the pit floor grade will generally match the natural grade to ensure maximum depth is not exceeded.
- The primary use of the site will be for Caltrans standard maintenance and operations, including:
    - Material mining, sorting, and stockpiling for use in routine and emergency maintenance activities on the State Highway System.
    - Caltrans Maintenance Forces will perform mining activities mostly with graders, loaders, dozers, and sorting grizzlies.
    - Only reusable imported natural materials, such as dirt and rock, collected from highway clean-up or Caltrans Construction activities, will be stored at the site. All other non-reusable natural materials will be disposed of elsewhere, likely a county landfill.
- A secondary use of the site will be to provide Caltrans Construction Contractors with a staging area for nearby projects. Contractors sometimes need an area off the highway to temporarily store construction equipment and materials. This will only occur in the lower pit area that has already been mined.
- After completion of Phase IV mining operations, topsoil berms will be spread on final slopes, pit floor and the dirt access road (west of lower pit) to enhance slope naturalization/re-vegetation.
- It is Caltrans intent to keep the lower pit area at this site in perpetuity as a maintenance, storage, and operations area, even after all mining material is exhausted and slopes are reclaimed. The proposed "end use" will be a designation conducive for this purpose.

Four phases of mining / operations and reclamation are proposed:

Phase I

Phase 1 of mining will entail excavation of a dirt access road cut into the southeast corner of the new mining area to establish access from the lower pit onto the upper mesa table were phase 1 starts, as identified in the plan sheets. Topsoil, approximately six inches in depth, will be relocated to a soil berm on the southern edge of the pit and access road. The Phase I pit will be graded to ensure internal drainage and catchment in a detention basin.

The pit floor elevation in this area will be lowered approximately 40 feet from current the natural grade elevation. There is an estimated 176,000 cubic yards (CY) of raw material in Phase I. With an estimated 5,000 CY/year average demand, this phase will last approximately 35 years.

Equipment such as loaders, excavators, and screening grizzlies, as well as production material stockpiles will continued to be stored in the lower pit.

Phase 2

Phase II mining will consist of expanding the slopes and pit floor of Phase I to the northwest, north and northeast. This phase contains approximately 67,000 CY of raw material. Estimating 5,000/year average demand, this phase will provide about 13 year's supply of aggregate.

Topsoil, approximately six inches in depth, will be relocated to a soil berm on the northwest and north edge of the pit. The topsoil berm created in Phase I will remain in place for reclamation activities at the end of Phase IV. The Phase II pit will be graded to ensure internal drainage.

Phase III

Phase III mining will consist of expanding the slopes and pit floor of Phase II to the east. This phase contains approximately 70,000 CY of raw material. Estimating 5,000 CY/year average demand, this phase will provide about 14 year's supply of aggregate.

Topsoil, approximately six inches in depth, will be relocated to a soil berm on the eastern edge of the pit. The topsoil berms created in Phases I and II will remain in place for reclamation activities at the end of Phase IV. The Phase III pit will be graded to ensure internal drainage.

Phase IV

Phase IV mining will consist of expanding the slopes and pit floor of Phase III to the southwest. This phase contains approximately 59,000 CY of raw material. Estimating 5,000 CY/year average demand, this phase will provide about 12 year's supply of aggregate.

Topsoil, approximately six inches in depth, will be relocated to existing soil berms created in Phases I and II. The Phase IV pit will be graded to ensure internal drainage of the mine site to the lower pit (southwest).

Upon completion of the extraction of all material to the grade lines as shown on Phase IV plan sheet, the final slopes will be reclaimed as depicted in Layout Sheet L-5 in accordance with SMARA regulations. Topsoil berms from Phases I, II and III will be removed and spread evenly on all slopes and pit floor.

Final Configuration

As mentioned in the General Operations Strategies, it is Caltrans intent to keep part of this site in perpetuity even after mining resources are exhausted and slopes are reclaimed. Once the upper pit has met the reclamation success criteria conditions per the reclamotian plan and returned to a land use designation of natural resources, a final site inspection will be performed with Inyo County. The lower pit will also be part of the final inspection, but with an end-use designation conducive with continued Caltrans Maintenance storage and staging for the 8.0 acres. Upan final site configuration, as described in plan sheet L-5, and after the final inspection with Inyo County, the associated mine ID will be retired. At this point, no further mining activities will occur at the site, and only Caltrans standard maintenance activities will occur on the site. Post reclamation site end uses will include:

- Caltrans Maintenance Forces equipment operation training.
- Stockpiling and storing natural materials such as rock, excess base material, reusable plant materials for erosion control, etc.
- Temporary utilization as a Construction Contractor staging area for equipment and natural materials.
- Only reusable imported notural materials, such os dirt and rock, collected from highway clean-up or Caltrans Construction activities, will be stored at the site. All other non-reusable natural materials will be disposed of elsewhere, likely a county landfill.

The usable areas of the final site configuration will be limited to the lower pit (southeast), excluding the stormwater/sediment settling basin, as all slopes will be set to 3:1 and re-vegetated. This usable area will include the 4.8 acres of the lower pit (which includes the settling basin).

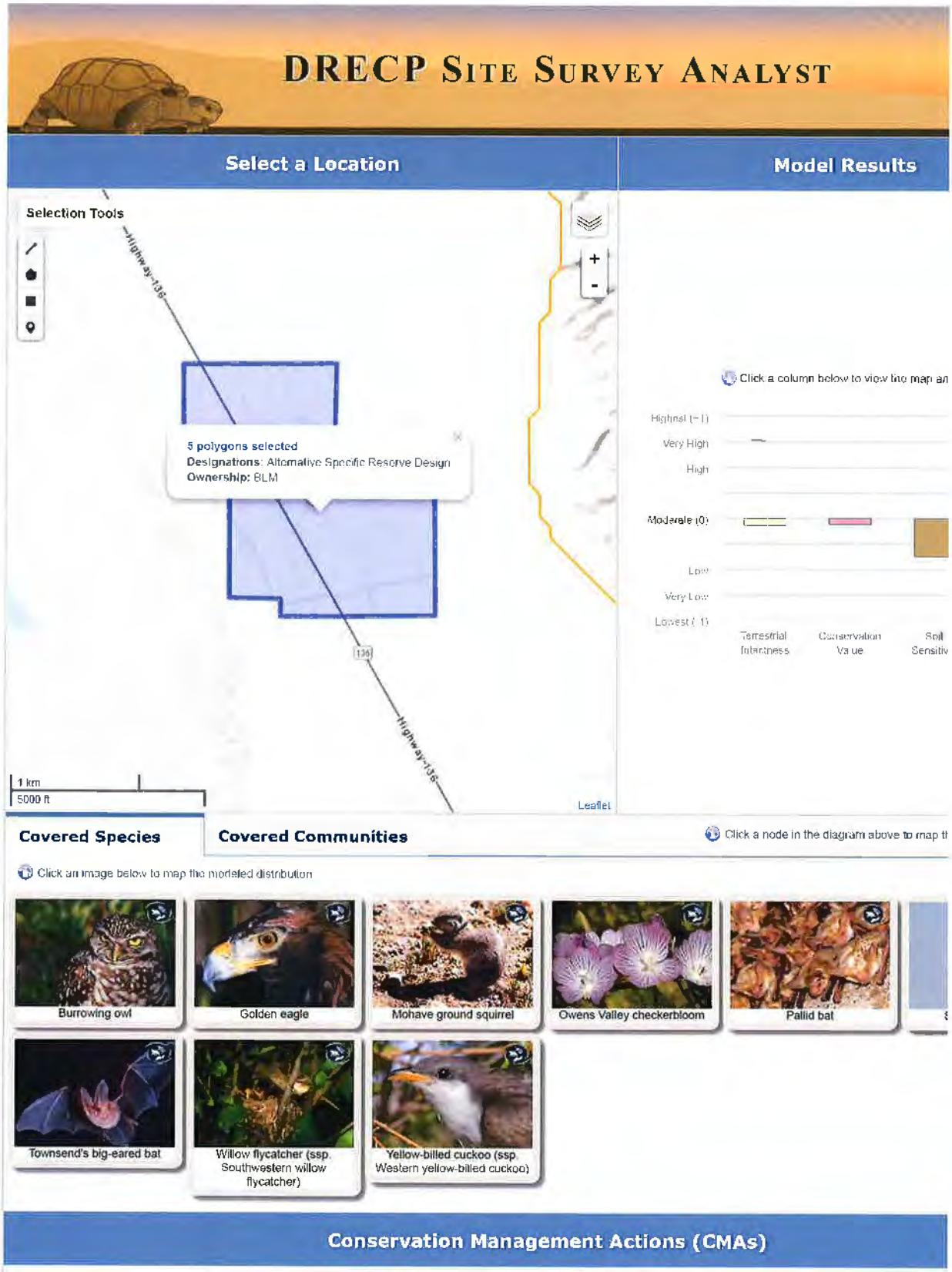
Since the operations plan for mining is based on estimates for extraction, it is also estimated that the final site configuration will likely not be realized for 70-80 years depending on several potential conditions.

Please refer to the associated plan sheets for further details as described in this document, as well as the actual reclamation plan.

APPENDIX E

DRECP – SITE SURVEY ANALYST

Attachment 6



PDFCROWD.COM

Species: **Burrowing owl *(Athene cunicularia)***

In the Reserve Design

BLM LUPA Lands:

AM-RES-BLM-1: The following CMA will be implemented on BLM LUPA conservation designations for all natural communities and Cov values, goals, objectives, and management actions established in the BLM special land allocation management plans (i.e., NLCS, ACEC and allocation) apply to land with BLM LUPA conservation designations, as described in Appendix L. Natural communities and Covered Specie LUPA conservation designations will be managed according to the unit--specific management actions to maintain the vegetation, fish and wi resource values within the NLCS/ACEC/Wildlife Allocation unit as described in the BLM special land allocation management plans (Appen

Species: **Golden eagle *(Aquila chrysaetos)***

In the Reserve Design

BLM LUPA Lands:

AM-RES-BLM-1: The following CMA will be implemented on BLM LUPA conservation designations for all natural communities and Cov values, goals, objectives, and management actions established in the BLM special land allocation management plans (i.e., NLCS, ACEC and allocation) apply to land with BLM LUPA conservation designations, as described in Appendix L. Natural communities and Covered Specie LUPA conservation designations will be managed according to the unit--specific management actions to maintain the vegetation, fish and wi resource values within the NLCS/ACEC/Wildlife Allocation unit as described in the BLM special land allocation management plans (Appen

AM-RES-BLM-ICS-9: The cumulative loss of foraging habitat within a 4 mile radius around active or alternative golden eagle nests (see A reserve will be limited to less than 10%.

Species: **Mohave ground squirrel *(Spermophilus [Xerospermophilus] mohavensis)***

In the Reserve Design

BLM LUPA Lands:

AM-RES-BLM-1: The following CMA will be implemented on BLM LUPA conservation designations for all natural communities and Cov values, goals, objectives, and management actions established in the BLM special land allocation management plans (i.e., NLCS, ACEC and allocation) apply to land with BLM LUPA conservation designations, as described in Appendix L. Natural communities and Covered Specie LUPA conservation designations will be managed according to the unit--specific management actions to maintain the vegetation, fish and wi resource values within the NLCS/ACEC/Wildlife Allocation unit as described in the BLM special land allocation management plans (Appen

AM-RES-BLM-ICS-14: Long-term vegetation removal within Important Areas will be prohibited, unless the land use is compatible with M squirrel protection and management. Compatible land uses are those described in the BLM LUPA for ACECs where Mohave ground squirrel

AM-RES-BLM-ICS-15: Any disturbance within suitable habitat will require the same protocol survey (AM-DFA-ICS-37), clearance survey 36), and construction monitoring (AM-DFA-ICS-41) measures for DFAs.

AM-RES-BLM-ICS-16: BLM will not authorize the use of rodenticides on BLM-administered land in areas where Mohave ground squirrel managed. Use of rodenticide inside of buildings is prohibited.

AM-RES-BLM-ICS-17: On BLM conservation lands, to the maximum extent practicable and/or as allowed under existing permits establish fencing to exclude cattle, horses, sheep, and other potential grazers from areas that are protected and managed for Mohave ground squirrel ar stands that are important foraging habitat, including winterfat and spiny hopsage.

Species: **Owens Valley checkerbloom *(Sidalcea covillei)***

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In the Reserve Design

BLM LUPA Lands:

AM-RES-BLM-1: The following CMA will be implemented on BLM LUPA conservation designations for all natural communities and Cov values, goals, objectives, and management actions established in the BLM special land allocation management plans (i.e., NLCS, ACEC and allocation) apply to land with BLM LUPA conservation designations, as described in Appendix L. Natural communities and Covered Specie LUPA conservation designations will be managed according to the unit--specific management actions to maintain the vegetation, fish and wi resource values within the NLCS/ACEC/Wildlife Allocation unit as described in the BLM special land allocation management plans (Appen

AM-RES-BLM-PLANT-1: For all land allocations, substations will be sited in such a way as to avoid suitable habitat for all plant Covered

Species: **Pallid bat *(Antrozous pallidus)***

In the Reserve Design

BLM LUPA Lands:

AM-RES-BLM-1: The following CMA will be implemented on BLM LUPA conservation designations for all natural communities and Cov values, goals, objectives, and management actions established in the BLM special land allocation management plans (i.e., NLCS, ACEC and allocation) apply to land with BLM LUPA conservation designations, as described in Appendix L. Natural communities and Covered Specie LUPA conservation designations will be managed according to the unit--specific management actions to maintain the vegetation, fish and wi resource values within the NLCS/ACEC/Wildlife Allocation unit as described in the BLM special land allocation management plans (Appen

Species: **Swainson's hawk *(Buteo swainsoni)***

In the Reserve Design

BLM LUPA Lands:

AM-RES-BLM-1: The following CMA will be implemented on BLM LUPA conservation designations for all natural communities and Cov values, goals, objectives, and management actions established in the BLM special land allocation management plans (i.e., NLCS, ACEC and allocation) apply to land with BLM LUPA conservation designations, as described in Appendix L. Natural communities and Covered Specie LUPA conservation designations will be managed according to the unit--specific management actions to maintain the vegetation, fish and wi resource values within the NLCS/ACEC/Wildlife Allocation unit as described in the BLM special land allocation management plans (Appen

Species: **Townsend's big-eared bat *(Corynorhinus townsendii)***

In the Reserve Design

BLM LUPA Lands:

AM-RES-BLM-1: The following CMA will be implemented on BLM LUPA conservation designations for all natural communities and Cov values, goals, objectives, and management actions established in the BLM special land allocation management plans (i.e., NLCS, ACEC and allocation) apply to land with BLM LUPA conservation designations, as described in Appendix L. Natural communities and Covered Specie LUPA conservation designations will be managed according to the unit--specific management actions to maintain the vegetation, fish and wi resource values within the NLCS/ACEC/Wildlife Allocation unit as described in the BLM special land allocation management plans (Appen

Species: **Willow flycatcher (ssp. Southwestern willow flycatcher) *(Empidonax traillii extimus)***

In the Reserve Design

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BLM LUPA Lands:

AMI-RES-BLM-1: The following CMA will be implemented on BLM LUPA conservation designations for all natural communities and Cov values, goals, objectives, and management actions established in the BLM special land allocation management plans (i.e., NLCS, ACEC and allocation) apply to land with BLM LUPA conservation designations, as described in Appendix L. Natural communities and Covered Specie LUPA conservation designations will be managed according to the unit--specific management actions to maintain the vegetation, fish and wi resource values within the NLCS/ACEC/Wildlife Allocation unit as described in the BLM special land allocation management plans (Appen

Species: Yellow-billed cuckoo (ssp. Western yellow-billed cuckoo) ***(Coccyzus americanus occide***

In the Reserve Design

BLM LUPA Lands:

AMI-RES-BLM-1: The following CMA will be implemented on BLM LUPA conservation designations for all natural communities and Cov values, goals, objectives, and management actions established in the BLM special land allocation management plans (i.e , NLCS, ACEC and allocation) apply to land with BLM LUPA conservation designations, as described in Appendix L. Natural communities and Covered Specie LUPA conservation designations will be managed according to the unit--specific management actions to maintain the vegetation, fish and wi resource values within the NLCS/ACEC/Wildlife Allocation unit as described in the BLM special land allocation management plans (Appen

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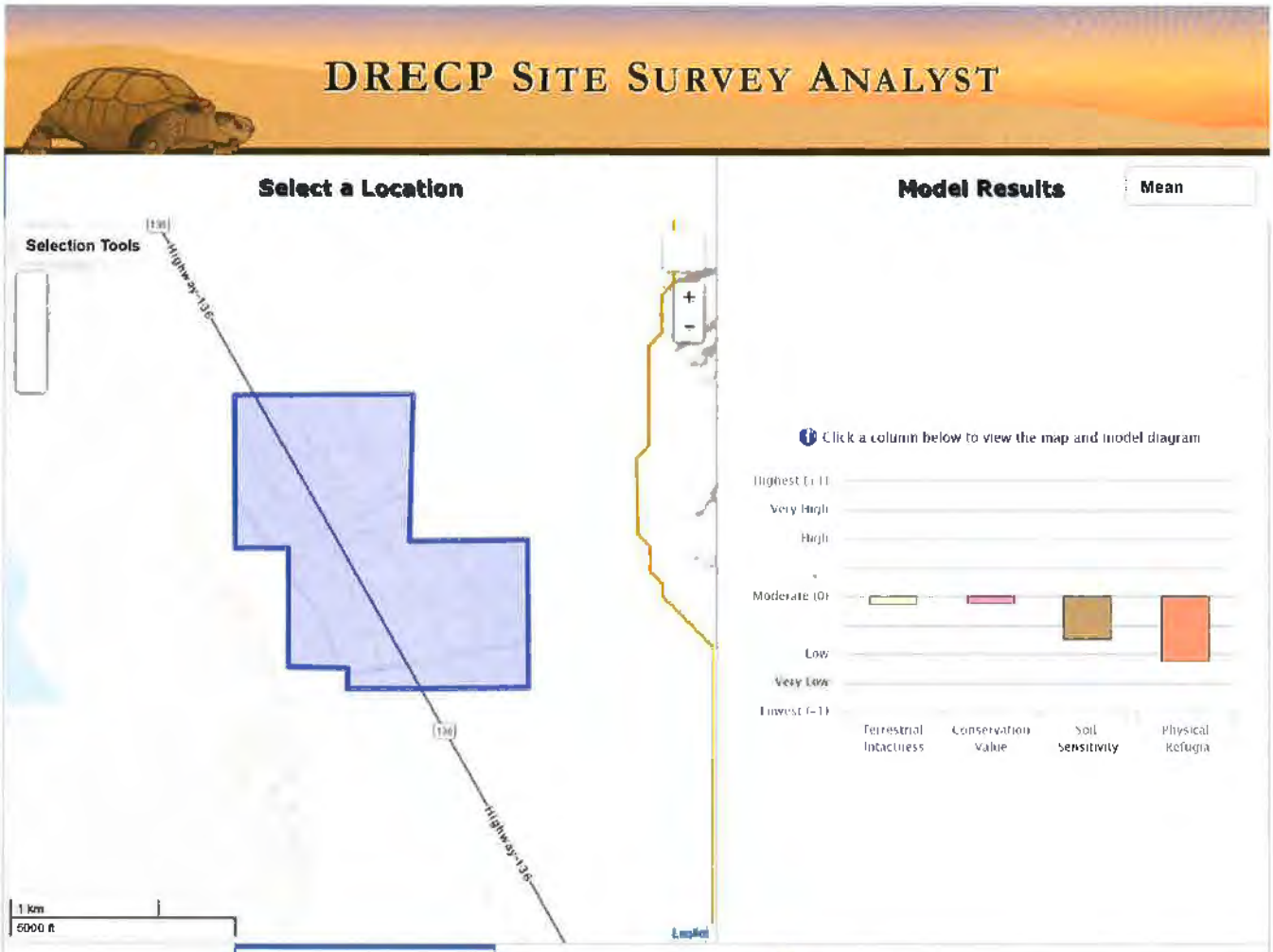


Conservation Management Actions (CMAs)

Community: Lower Bajada and Fan Mojavean – Sonoran Desert Scrub

In the Reserve Design

BLM LUPA Lands:

AM-RES-BLM-1: The following CMA will be implemented on BLM LUPA conservation designations for all natural communities and Covered Species: The values, goals, objectives, and management actions established in the BLM special land allocation management plans (i.e., NLCS, ACEC and wildlife allocation) apply to land with BLM LUPA conservation designations, as described in Appendix L. Natural communities and Covered Species within BLM LUPA conservation designations will be managed according to the unit-specific management actions to maintain the vegetation, fish and wildlife, and other resource values within the NLCS/ACEC/Wildlife Allocation unit as described in the BLM special land allocation management plans (see Appendix L).

Community: Shadscale – Saltbush Cool Semi-desert Scrub

In the Reserve Design

BLM LUPA Lands:

AM-RES-BLM-1: The following CMA will be implemented on BLM LUPA conservation designations for all natural communities and Covered Species: The values, goals, objectives, and management actions established in the BLM special land allocation management plans (i.e., NLCS, ACEC and wildlife allocation) apply to land with BLM LUPA conservation designations, as described in Appendix L. Natural communities and Covered Species within BLM LUPA conservation designations will be managed according to the unit-specific management actions to maintain the vegetation, fish and wildlife, and other resource values within the NLCS/ACEC/Wildlife Allocation unit as described in the BLM special land allocation management plans (see Appendix L).

Community: Southwestern North American Salt Basin And High Marsh

In the Reserve Design

BLM LUPA Lands:

AM-RES-BLM 1: The following CMA will be implemented on BLM LUPA conservation designations for all natural communities and Covered Species: The values, goals, objectives, and management actions established in the BLM special land allocation management plans (i.e , NLCS, ACEC and wildlife allocation) apply to land with BLM LUPA conservation designations, as described in Appendix L. Natural communities and Covered Species within BLM LUPA conservation designations will be managed according to the unit-specific management actions to maintain the vegetation, fish and wildlife, and other resource values within the NLCS/ACEC/Wildlife Allocation unit as described in the BLM special land allocation management plans (see Appendix L).

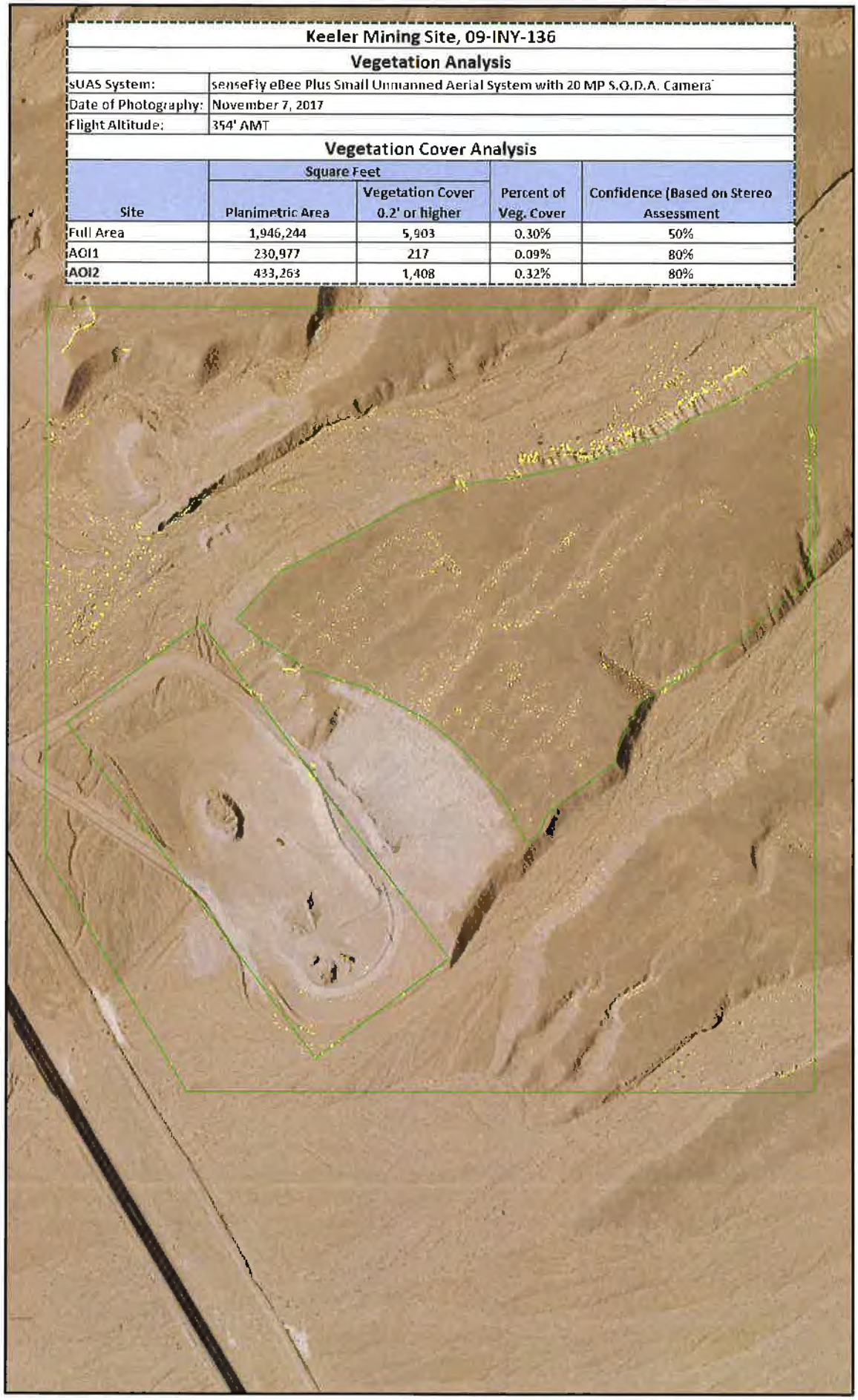
Desert Renewable Energy Conservation Plan (DRECP)
Site Survey Report
Report generated on July 5th 2019 09:31

APPENDIX F

VEGETATION COVER MAP AND CHART

Attachment 6

Keeler Mining Site, 09-INY-136				
Vegetation Analysis				
sUAS System:	senseFly eBee Plus Small Unmanned Aerial System with 20 MP S.O.D.A. Camera			
Date of Photography:	November 7, 2017			
Flight Altitude:	354' AMT			
Vegetation Cover Analysis				
Site	Square Feet		Percent of Veg. Cover	Confidence (Based on Stereo Assessment
	Planimetric Area	Vegetation Cover 0.2' or higher		
Full Area	1,946,244	5,903	0.30%	50%
AOI1	230,977	217	0.09%	80%
AOI2	433,263	1,408	0.32%	80%



APPENDIX G

RECLAMATION PLAN CONTENT - CHECKLIST

Attachment 6

Reclamation Plan Content Checklist

The Division of Mine Reclamation (DMR) reviews reclamation plans for compliance and completeness pursuant to Public Resources Code (PRC) Section 2772.1(b)(1). When submitting a reclamation plan to DMR, the lead agency must certify that the reclamation plan is a complete submission and is in compliance with SMARA and associated regulations and the lead agency's mining ordinance pursuant to PRC 2772.1(a)(3)(A-E). Additionally, pursuant to PRC 2772.1(a)(2), information prepared as part of a permit application or environmental document (pursuant to CEQA) shall be incorporated into the reclamation plan if it is used to satisfy the requirements of SMARA and associated regulations. These items shall be properly indexed in a Required Contents Chart and included in an appendix to the reclamation plan.

This checklist may assist operators and lead agencies when preparing and reviewing draft proposed reclamation plans and reclamation plan amendments in determining if they meet the minimum content requirements of the Surface Mining and Reclamation Act of 1975 (SMARA) and associated regulations (see box below for sections relevant to reclamation plans).

Surface Mining and Reclamation Act of 1975
Public Resources Code (PRC)
Division 2. Geology, Mines and Mining
Chapter 9. Surface Mining and Reclamation Act of 1975
Section 2710 et seq.

This portion includes requirements for reclamation plans.

Associated Regulations
California Code of Regulations (CCR)
Title 14. Natural Resources
Division 2. Department of Conservation
Chapter 8. Mining and Geology
Subchapter 1. State Mining and Geology Board

Article 1. Surface Mining and Reclamation Practice. Commencing with Section 3500

This portion includes minimum acceptable mining and reclamation practices for surface mining operations.

Article 9. Reclamation Standards. Commencing with Section 3700

This portion includes performance standards, which may apply to surface mining operations pursuant to CCR Section 3700.

The checklist is divided into seven topical areas: General Considerations, Geology and Geotechnical, Hydrology and Water Quality, Sensitive Species and Habitat, Topsoil, Revegetation, and Agriculture. To use the checklist, place a checkmark next to items that have been addressed by the reclamation plan or leave it blank if the reclamation plan is deficient. Alternatively, write N/A if the item is not applicable to the specific surface mining operation being reviewed.

Disclaimer: This checklist, prepared by DMR, paraphrases portions of SMARA and associated regulations that address the content of reclamation plans and plan amendments. DMR staff uses this checklist internally in performing our review of reclamation plans. However, use of this checklist is not required and it is provided only as a helpful tool. DMR always recommends consulting the full text of SMARA and associated regulations, available at the link below. Additionally, completion of this checklist does not guarantee completeness or compliance of the reclamation plan pursuant to PRC Section 2772.1(b)(1). Analysis of completeness and compliance requires thorough review of each specific project.

http://www.conservation.ca.gov/index/Pages/lawsregs.aspx

Mine Name: Keeler Pit (Mine ID 91-14-0051	Checklist Completed by: Forest Becket
End Use: State DOT Maintenance Area, Open Space	Date: July 15, 2019

GENERAL CONSIDERATIONS

Authority	Requirements/Practices/Standards	✓ or N/A
PRC 2772(b)	Required contents chart: A chart identifying the location (e.g. page number, chapter, appendix, or other location in the reclamation plan) of content that meets the requirements of PRC Sections 2772, 2773, 2773.3 and CCR Articles 1 and 9 (as delineated in this checklist).	Appx G
PRC 2772(c)(1)	Contact information: Name and address of the surface mining operator and any person designated by the operator as an agent for service of process (must reside in CA).	1.1.0 1.3.0 1.4.0
PRC 2772(c)(2)	Material quantity and type: The anticipated total quantity and type of minerals to be mined (see Annual Report Instructions, Exhibit B, for mineral types and units of measure).	2.3.2 2.5.2 3.3.0
PRC 2772(c)(3)	Dates: The initiation and termination dates of mining (be as specific as possible, e.g. December 31, 2030).	3.2.0
PRC 2772(c)(4)	Depth of mining: The maximum anticipated depth of the surface mining operation.	1.0.0 3.4.2.1
PRC 2772(c)(5) (A-F)	Reclamation plan maps shall include: Size and legal description of lands affected by surface mining operations;	Appx. B, C
	Names and addresses of owners of all surface interests and mineral interests;	Appx C
	Property lines, setbacks, and the reclamation plan boundary;	Appx C
	Existing and final topography with contour lines at appropriate intervals;	Appx C
	Detailed geologic description of the area of the surface mining operation;	Appx C
	Locations of railroads, utility features, and roads (access roads, temporary roads to be reclaimed, and any roads remaining for the end use).	Appx C
	All maps, diagrams, or calculations that are required to be prepared by a California-licensed professional shall include the preparer's name, license number, signature & seal.	Appx C
PRC 2772(c)(6)	Mining method and schedule: A description of the mining methods and a time schedule that provides for completion of mining on each segment so that reclamation can be concurrent or phased.	1.0.0 Appx D
PRC 2772(c)(7)	Subsequent use(s): A description of the proposed subsequent use(s) after reclamation	4.1.0
	Evidence that all landowners have been notified of the proposed use.	Appx B
PRC 2772(c)(9)	Impact on future mining: A statement regarding the impact of reclamation on future mining on the site.	4.2.0
PRC 2772(c)(10)	Signed statement: Statement signed by the operator accepting responsibility for reclamation of the mined lands per the reclamation plan.	N/A
PRC 2776(b-c)	Pre-SMARA areas: Reclamation plans shall apply to operations conducted after January 1, 1976 or to be conducted in the future. Mined lands disturbed prior to January 1, 1976 *and not disturbed after that date* may be excluded from the reclamation plan.	N/A
CCR 3502(b)(2)	Public health and safety: A description of how any potential public health and safety concerns that may arise due to exposure of the public to the site will be addressed.	4.8.0
CCR 3709(a)	Equipment storage and waste disposal: Designate areas for equipment storage and show on maps.	3.4.0
	All waste shall be disposed of in accordance with state and local health and safety ordinances.	3.6.0
CCR 3709(b)	Structures and equipment removed:	4.4.3

	Structures and equipment should be dismantled and removed at closure, except as demonstrated to be necessary for the proposed end use.	3.5.0 4.4.3
CCR 3713(a)	Well closures: Drill holes, water wells, monitoring wells will be completed or abandoned in accordance with laws, unless demonstrated necessary for the proposed end use.	N/A
CCR 3713(b)	Underground openings: Any portals, shafts, tunnels, or openings will be gated or protected from public entry, and to preserve access for wildlife (e.g. bats).	N/A

GEOLOGY AND GEOTECHNICAL

Authority	Requirements/Practices/Standards	✓ or N/A
PRC 2772(c)(5)	A description of the general geology of the area	2.3.0
	A detailed description of the geology of the mine site.	2.3.1
PRC 2773.3	If a metallic mine is located on, or within one mile of, any "Native American sacred site" and is located in an "area of special concern," the reclamation plan shall require that all excavations and/or excess materials be backfilled and graded to achieve the approximate original contours of the mined lands prior to mining.	N/A
CCR 3502(b)(4)	The source and disposition of fill materials used for backfilling or grading shall be considered in the reclamation plan.	4.4.0
CCR 3502(b)(3)	The designed steepness and treatment of final slopes must consider the physical properties of slope materials, maximum water content, and landscaping.	4.4.1
	The reclamation plan shall specify slope angles flatter than the critical gradient for the type of slope materials.	4.4.0 4.4.1
	When final slopes approach the critical gradient, a Slope Stability Analysis will be required.	4.4.1
CCR 3704.1	Backfilling required for surface mining operations for metallic minerals.	N/A
CCR 3704(a)	For urban use, fill shall be compacted in accordance with Uniform Building Code, local grading ordinance, or other methods approved by the lead agency.	N/A
CCR 3704(b)	For resource conservation, compact to the standards required for that end use.	N/A
CCR 3704(d)	Final reclamation fill slopes shall not exceed 2:1 (H:V), except when allowed by site-specific engineering analysis, and the proposed final slope can be successfully revegetated. See also Section 3502(b)(3).	3.9.2 3.9.3 4.10.2
CCR 3704(e)	At closure, all fill slopes shall conform with the surrounding topography or approved end use.	4.10.2
CCR 3704(f)	Final cut slopes must have a minimum slope stability factor of safety that is suitable for the end use and conforms with the surrounding topography or end use.	4.4.1 4.10.2

HYDROLOGY AND WATER QUALITY

Authority	Requirements/Practices/Standards	✓ or N/A
PRC 2770.5	For operations within the 100-year flood plain (defined by FEMA) and within one mile up- or downstream of a state highway bridge, Caltrans must be notified and provided a 45-day review period by the lead agency.	N/A
PRC 2772(c)(8)(A)	Description of the manner in which contaminants will be controlled and mine waste will be disposed.	3.4.2.4 3.6.0
PRC 2772(c)(8)(B)	The reclamation plan shall include a description of the manner in which stream banks/beds will be rehabilitated to minimize erosion and sedimentation.	3.4.2.6
PRC 2773(a)	The reclamation plan shall establish site-specific sediment and erosion control criteria for monitoring compliance with the reclamation plan.	4.7.0 4.9.1
CCR 3502(b)(6)	Temporary stream and watershed diversions shall be detailed in the reclamation plan.	N/A
CCR 3503(a)(2)	Stockpiles of overburden and minerals shall be managed to minimize water and wind erosion.	3.4.2.4 4.10.1

CCR 3503(b)(2)	Operations shall be conducted to substantially prevent siltation of groundwater recharge areas.	2.4.0 2.4.3
CCR 3503(a)(3)	Erosion control facilities shall be constructed and maintained where necessary to control erosion.	3.4.1
CCR 3503(b)(1)	Settling ponds shall be constructed where they will provide a significant benefit to water quality.	3.4.1 3.4.2.6
CCR 3503(d)	Disposal of mine waste and overburden shall be stable and shall not restrict natural drainage without suitable provisions for diversion.	3.3.0 3.4.2.4
CCR 3503(e)	Grading and revegetation shall be designed to minimize erosion and convey surface runoff to natural drainage courses or interior basins.	4.5.0 Appx C
	Spillway protection shall be designed to prevent erosion.	N/A
CCR 3706(a)	Surface mining and reclamation activities shall be conducted to protect on-site and downstream beneficial uses of water.	3.4.1 4.10.1
CCR 3706(b)	Water quality, recharge potential, and groundwater storage that is accessed by others shall not be diminished.	2.4.0 2.4.3
CCR 3706(c)	Erosion and sedimentation shall be controlled during all phases of construction, operation, reclamation, and closure of surface mining operations to minimize siltation of lakes and water courses as per RWQCB/SWRCB.	3.4.1 4.10.1
CCR 3706(d)	Surface runoff and drainage shall be controlled to protect surrounding land and water resources.	3.4.1
	Erosion control methods shall be designed for not less than 20 year/1 hour intensity storm event.	3.4.2.6
CCR 3706(e)	Impacted drainages shall not cause increased erosion or sedimentation. Mitigation alternatives shall be proposed in the reclamation plan.	3.4.2.6
CCR 3706(f)(1)	Stream diversions shall be constructed in accordance with the Lake and Streambed Alteration Agreement (LSAA) between the operator and the Department of Fish and Wildlife.	N/A
CCR 3706(f)(2)	Stream diversions shall also be constructed in accordance with Federal Clean Water Act and the Rivers and Harbors Act of 1899.	N/A
CCR 3706(g)	All temporary stream diversions shall eventually be removed and the affected land reclaimed.	N/A
CCR 3710(a)	Surface and groundwater shall be protected from siltation and pollutants in accordance with the Porter-Cologne Act, the Federal Clean Water Act, and RWQCB/SWRCB requirements.	3.4.1 4.10.1
CCR 3710(b)	In-stream mining shall be conducted in accordance with Section 1600 et seq. of the California Fish and Game Code, Section 404 of the Clean Water Act, and Section 10 of the Rivers and Harbors Act of 1899.	N/A
CCR 3710(c)	In-stream mining shall be regulated to prevent impacts to structures, habitats, riparian vegetation, groundwater levels, and banks.	N/A
	In-stream channel elevations and bank erosion shall be evaluated annually using extraction quantities, cross-sections, and aerial photos.	N/A
CCR 3712	Mine waste and tailings and mine waste disposal units are governed by SWRCB waste disposal regulations and shall be reclaimed in accordance with this article: CCR Article 1. Surface Mining and Reclamation Practice. Section 3500 et seq.	3.3.0

SENSITIVE SPECIES AND HABITAT

Authority	Requirements/Practices/Standards	✓ or N/A
CCR 3502(b)(1)	A description of the environmental setting (identify sensitive species, wildlife habitat, sensitive natural communities, e.g. wetlands).	2.6.0 2.7.0
	Impacts of reclamation on surrounding land uses.	2.9.1
CCR 3503(c)	Fish and wildlife habitat shall be protected by all reasonable measures.	Table 4.10.3
CCR 3703(a)	Sensitive species shall be conserved or mitigated as prescribed by the federal and California Endangered Species Acts.	2.6.2 2.7.2
CCR 3703(b)	Wildlife habitat shall be established on disturbed land at least as good as pre-project, unless end use precludes its use as wildlife habitat.	4.9.0 4.10.3
CCR 3703(c)	Wetlands shall be avoided or mitigated at 1:1 minimum for both acreage and habitat value.	N/A
CCR 3704(g)	Piles or dumps shall not be placed in wetlands without mitigation.	N/A
CCR 3710(d)	In-stream mining shall not cause fish to be trapped in pools or off-channel pits, or restrict migratory or spawning activities.	N/A

TOPSOIL

Authority	Requirements/Practices/Standards	✓ or N/A
CCR 3503(a)(1)	Removal of vegetation and overburden preceding mining shall be kept to a minimum.	3.4.1 3.4.2.3
CCR 3503(f)	When the reclamation plan calls for resoiling, mine waste shall be leveled and covered with a layer of finer material. A soil layer shall then be placed on this prepared surface.	4.4.0
	The use of soil conditioners, mulches, or imported topsoil shall be considered where such measures appear necessary.	N/A
CCR 3704(c)	Mine waste shall be stockpiled to facilitate phased reclamation and kept separate from topsoil or other growth media.	4.5.0
CCR 3705(e)	If soil is altered or other than native topsoil, soil analysis is required. Add fertilizers or soil amendments if necessary.	N/A
CCR 3711(a)	All salvageable topsoil shall be removed as a separate layer.	3.4.1
	Topsoil and vegetation removal should not precede mining by more than one year.	3.4.2.3
CCR 3711(b)	Topsoil resources shall be mapped prior to stripping and location of topsoil stockpiles shown on map included in the reclamation plan.	Appx C
	Topsoil and other growth media shall be maintained in separate stockpiles.	4.5.0
	Test plots may be required to determine the suitability of growth media for revegetation purposes.	N/A
CCR 3711(c)	Soil salvage operations and phases of reclamation shall be set forth in the reclamation plan to minimize the area disturbed and to achieve maximum revegetation success.	3.1.0 Appx C
CCR 3711(d)	Topsoil and growth media shall be used to phase reclamation as soon as can be accommodated following the mining of an area.	4.5.0
	Topsoil stockpiles shall not be disturbed until needed for reclamation.	3.4.1
	Topsoil stockpiles shall be clearly identified.	Appx C
	Topsoil shall be planted with vegetation or otherwise protected to prevent erosion and discourage weeds.	N/A
CCR 3711(e)	Topsoil shall be redistributed in a manner resulting in a stable, uniform thickness consistent with the end use.	4.6.3

REVEGETATION

Authority	Requirements/Practices/Standards	✓ or N/A
PRC 2773(a)	The reclamation plan shall be specific to the property and shall establish site-specific criteria for evaluating compliance with the reclamation plan with respect to revegetation.	2.6.5 4.6.0
CCR 3503(g)	Available research regarding revegetation methods and selection of species given the topography, resoiling characteristics, and climate of the mined areas shall be used.	2.6.0 7.0.0
CCR 3705(a)	Baseline studies shall be conducted prior to mining activities to document vegetative cover, density, and species richness.	2.6.0 2.6.1
	Vegetative cover shall be similar to surrounding habitats and self-sustaining.	4.6.0
CCR 3705(b)	Test plots shall be conducted simultaneously with mining to ensure successful implementation of the proposed revegetation plan.	N/A
CCR 3705(c)	Decompaction methods, such as ripping and disking, shall be used in areas to be revegetated to establish a suitable root zone for planting.	4.6.0 4.6.4
CCR 3705(d)	Roads shall be stripped of roadbase materials, resoiled, and revegetated, unless exempted.	4.4.0
CCR 3705(f)	Temporary access shall not disrupt the soil surface on arid lands except where necessary for safe access. Barriers shall be installed to keep unauthorized vehicles out.	2.1.0 3.4.2.2
CCR 3705(g)	Use local native plant species (unless non-native species meet the end use).	4.6.2
	Areas to be developed for industrial, commercial, or residential shall be revegetated for the interim period to control erosion.	N/A
CCR 3705(h)	Planting shall be conducted during the most favorable period of the year for plant establishment.	4.6.0
CCR 3705(i)	Use soil stabilizing practices and irrigation when necessary to establish vegetation.	4.7.0

CCR 3705(j)	If irrigation is used, demonstrate that revegetation has been self-sustaining without irrigation for two years prior to the release of financial assurance.	N/A
CCR 3705(k)	Noxious weeds shall be monitored and managed. TABLE	4.10.3
CCR 3705(l)	Plant protection measures such as fencing and caging shall be used where needed for revegetation success. Protection measures shall be maintained until revegetation efforts are successfully completed and the lead agency authorizes removal.	N/A
CCR3705(m)	Quantitative success standards for vegetative cover, density, and species richness shall be included in the reclamation plan. TABLE	4.9.3 4.10.3
	Monitoring to occur until success standards have been achieved.	4.11.0
	Sampling techniques for measuring success shall be specified. Sample size must be sufficient to provide at least an 80 percent statistical confidence level.	4.9.3 4.10.3

AGRICULTURE

Authority	Requirements/Practices/Standards	✓ or N/A
CCR 3707(a)	Where the end use will be agriculture, prime agricultural land shall be returned to a fertility level specified in the reclamation plan.	N/A
CCR 3707(b)	Segregate and replace topsoil in proper sequence by horizon in prime agricultural soils.	N/A
CCR 3707(c)	Post reclamation productivity rates for prime agricultural land must be equal to pre-project condition or to a similar site for two consecutive years.	N/A
	Productivity rates shall be specified in the reclamation plan.	N/A
CCR 3707(d)	If fertilizers and amendments are applied, they shall not cause contamination of surface or groundwater.	N/A
CCR 3708	For sites where the end use is to be agricultural, non-prime agricultural land must be reclaimed to be capable of sustaining economically viable crops common to the area.	N/A