

From: "Brian Messer" <BMesser@johnobronson.com>
To: <MIAD_mods@mp.usbr.gov>
Date: Mon, Jan 5, 2009 12:28 PM
Subject: Morman Island Auxiliary Dam

Dear Laura,

I was directed to you by SAFECA. I would like information on the inundation area if Dike 8 fails.

Thank you for your help!

Sincerely,

Brian Messer
916-205-6477

CONFIDENTIALITY NOTICE: The information contained in this e-mail and attached document(s) may contain confidential information that is intended only for the addressee(s). If you are not the intended recipient you are hereby advised that any disclosure, copying, distribution or the taking of any action in reliance upon the information is prohibited. If you have received this e-mail in error please immediately notify the sender and delete it from your system.

January 5, 2009

SENT VIA E-MAIL

Ms. Laura Caballero
Bureau of Reclamation
Central California Area Office
7794 Folsom Dam Road
Folsom, CA 95630

Subject: Folsom Reservoir Safety of Dams – Mormon Island Auxiliary Dam

Dear Ms. Caballero:

Thank you for providing this project to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for staff review. Staff comments follow.

We believe there may be significant air quality impacts from the construction activities proposed for this project. SMAQMD has established a construction phase threshold of significance for NO_x of 85 pounds per day. An air quality analysis should be done on the project to verify the significance of its construction-related air quality impacts. We recommend using the most current version of URBEMIS 2007, version 9.2.4, available at www.urbemis.com. If its impacts are found to be significant, we recommend that our standard construction mitigation measures be applied to the project. These measures include both on-site strategies and a possible off-site mitigation fee. They can be found on our website, www.airquality.org.

We also recommend that the EIR include a discussion of climate change. Construction activities proposed for this project may result in significant greenhouse gas emissions. While there are currently no adopted thresholds of significance for project-related greenhouse gasses, multiple authoritative resource guides exist for addressing greenhouse gas emissions for projects subject to CEQA. The California Air Pollution Control Officers Association (CAPCOA) publication *CAPCOA CEQA & Climate Change* provides guidance on addressing project impacts on climate change through CEQA (www.capcoa.org). Additionally, the Governor's Office of Planning and Research (OPR) has issued a technical advisory on this subject, entitled *CEQA and Climate Change: Addressing Climate Change through CEQA Review* (www.opr.ca.gov).

Finally, all projects are subject to SMAQMD rules and regulations in effect at the time of construction. Please see the attached document describing SMAQMD rules which may apply to this project. Information regarding District rules can be obtained at www.airquality.org or by calling the Compliance Assistance Hotline at 916-874-4883.

If you have any questions on this matter, please contact JJ Hurley at 916-874-2694 or jhurley@airquality.org, or Molly Wright at 916-874-4886 or mwright@airquality.org. We look forward to receiving a copy of the Draft EIR for this project for review.

Sincerely,



Molly Wright
Associate Air Quality Planner / Analyst

c: Larry Robinson, Program Coordinator, SMAQMD

SMAQMD Rules & Regulations Statement (revised 1/07)

*The following statement is recommended as standard condition of approval or construction document language for **all** development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):*

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Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the District early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc) with an internal combustion engine over 50 horsepower are required to have a SMAQMD permit or a California Air Resources Board portable equipment registration.

Other general types of uses that require a permit include dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

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Rule 442: Architectural Coatings. The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

RECLAMATION

Managing Water in the West

Comment Sheet for Mormon Island Auxiliary Dam

Comments should be submitted by Monday, January 5, 2009

to Ms. Laura Caballero

Bureau of Reclamation, 7794 Folsom Dam Road, Folsom, CA 95630

or fax 916-989-7109

or MIAD_mods@mp.usbr.gov

Written comments may also be submitted tonight at the Comment Table.

(Please print clearly)

Name Ed Roman

Organization and Address _____

Phone (916) 532-5667 FAX () _____ E-mail eroman@smud.org

Comment here: 12/2/08
Date

It would be helpful to have a display on
costs.

All comments become part of the public record.

RECLAMATION

Managing Water in the West

Comment Sheet for Mormon Island Auxiliary Dam

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to Ms. Laura Caballero

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or MIAD_mods@mp.usbr.gov

Written comments may also be submitted tonight at the Comment Table.

(Please print clearly)

Name L J LAURENT

Organization and Address 1212 FORREST ST FOLSOM CA 95630

Phone (916) 985 4488 FAX () E-mail ljlaurent@att.net

Comment here:

Dec 2, 2008
Date

There is no pedestrian/dog/horse access to the SAC COUNTY portion of Folsom Res. Since the work road was built along the Southern shore & the only way in is a NARROW boat ramp bridge near the kiosk. IT is too high for my knees to walk up to the temp bridge & then right down. I can't do it because of physical limitation. AND, it is not a good place for horses & dogs to compete with cars. I would like to see some weekend access point to Dyke 8 (near the church) where the vertical rise is only about 20-30'. Forcing us uphill on a steep rise, competing with traffic is not good.

All comments become part of the public record.

RECLAMATION

Managing Water in the West

Comment Sheet for Mormon Island Auxiliary Dam

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to Ms. Laura Caballero

Bureau of Reclamation, 7794 Folsom Dam Road, Folsom, CA 95630

or fax 916-989-7109

or MIAD_mods@mp.usbr.gov

Written comments may also be submitted tonight at the Comment Table.

(Please print clearly)

Name

DON RUIO

Organization and Address

261 Cascade Falls Drive
Folsom, CA, 95630

Phone

(916) 705-0292

FAX

E-mail

donr@svco.com

Comment here:

12/2/08

Date

- ① Maintain traffic at all times in both directions to avoid drastic affects to Folsom, El Dorado County, and Placer County traffic circulation
- ② Consider temporary road to South of existing road even if you have to bridge the wetlands as an alternative to Shoring North Side of Green Valley Road
- ③ If possible limit access to light to existing light at East end of Project
- ④ If other access from Green Valley Road is absolutely necessary, utilize a light synchronized with existing light to east!

All comments become part of the public record.

RECLAMATION

Managing Water in the West

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to Ms. Laura Caballero

Bureau of Reclamation, 7794 Folsom Dam Road, Folsom, CA 95630

or fax 916-989-7109

or MIAD_mods@mp.usbr.gov

Written comments may also be submitted tonight at the Comment Table.

(Please print clearly)

Name

Jeff Barker

Organization and Address

4881 Danbury Cir.

EDH 95762

Phone ()

FAX ()

E-mail

jumb83@comcast.net

Comment here:

12-2-08

Date

When work begins on the Mormon Dam (Dike 8), it would be great if access from Folsom Pt. to the Browns Ravine trail was not completely shut down. If trail re-routes could be built (like near Dike 6-4), it would be greatly appreciated!!

All comments become part of the public record.

RECLAMATION

Managing Water in the West

Comment Sheet for Mormon Island Auxiliary Dam

Comments should be submitted by Monday, January 5, 2009

to Ms. Laura Caballero

Bureau of Reclamation, 7794 Folsom Dam Road, Folsom, CA 95630

or fax 916-989-7109

or MIAD_mods@mp.usbr.gov

Written comments may also be submitted tonight at the Comment Table.

(Please print clearly)

Name HAROLD L. GRAVES

Organization and Address 169 LIVERMORE WAY
FOLSOM 95630

Phone (916) 983-5536 FAX () _____ E-mail _____

Comment here: 11/2/08
Date

IN (around) 1990 THE U.S. GOVERNMENT
SPENT SEVERAL MILLIONS OF DOLLARS COMPACTING
MORMAN ISLAND SIDE OF THE FOLSOM DAM
FOR A YEAR OR SO THEY DRILLED, FILLED AND
WITH BIG POWER DRIVERS RE-COMPACTED THE
DAM.

I ASK, WHY ARE THEY DOING IT AGAIN

Harold L. Graves

All comments become part of the public record.

CITY OF FOLSOM

50 Natoma Street
Folsom, California 95630



Public Works Department
Administration/Engineering

April 30, 2009

Mr. Pete Ghelfi
Sacramento Area Flood Control Agency
1007 7th Street, 7th Floor
Sacramento, CA 95814

**SUBJECT: NOTICE OF PREPARATION FOR MORMON ISLAND AUXILIARY
DAM MODIFICATION PROJECT SEIR**

Dear Mr. Ghelfi:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of the Supplemental Environmental Impact Statement/Environmental Impact Report (SEIR/SEIS) for the revised Mormon Island Auxiliary Dam (MIAD) Modification Project. We have reviewed the NOP dated April 15, 2009 and hereby submit the following comments on behalf of the City of Folsom, pursuant to Section 21153(a) of the California Public Resources Code and Section 15082 of the California Environmental Quality Act (CEQA).

Green Valley Road. Per the project description in the NOP, it may be necessary to permanently relocate Green Valley Road further south in order to make room for the required excavation. The City of Folsom desires that such relocation be performed prior to the closure of the existing Green Valley Road, and that the SEIS/EIR should not assume any detour of the over 20,000 daily vehicles that use Green Valley Road. Furthermore, the City's General Plan identifies Green Valley Road as a future four-lane roadway with on-street bicycle lanes, which is reflected in the current road easement width of the existing Green Valley Road corridor. Any realigned section of Green Valley Road must preserve the necessary easement width for an ultimate four-lane roadway that meets the City's current design standards. All costs associated with the relocation of Green Valley Road should be borne by the project.

Mormon Island Wetland Natural Preserve (MIWNP). Any realignment of Green Valley Road to the south of its current alignment will have an impact on the Mormon Island Wetland Natural Preserve. The magnitude of this impact may be somewhat lessened by the manner in which the realignment is constructed. The SEIS/EIR should include an analysis of the potential impacts to MIWNP related to the proposed Green Valley Road realignment, and should suggest (if necessary) construction methods that will minimize such impacts. This may require the construction of a causeway or multiple culverts to maintain adequate drainage, minimize flooding potential, and minimize wildlife impacts. All costs associated with said mitigation shall be borne by the project.

Haul/delivery routes to MIAD job site. The MIAD project will likely require substantial volumes of heavy vehicles traveling to and from the job site to deliver equipment or haul material. The SEIS/EIR should include an analysis of the volume of trucks, their potential impacts to the operations and maintenance of the affected roadways and propose specific delivery and haul routes.

Once again, we appreciate the opportunity to provide comments on the NOP. If you have any questions, please contact Mark Rackovan, Senior Civil Engineer, at (916)351-3370 or mrackovan@folsom.ca.us.

Sincerely,



Richard J. Lorenz, P.E.
Public Works Director/City Engineer

RJL:MR

c: Congressman D. Lungren
Senator D. Cox
Assemblyman R. Niello
Mayor & City Council
M. Miller, The Ferguson Group
K. Miller
J. Luchi
M. Rackovan

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Mormon Island Auxiliary Dam Modification Project Supplemental EIS/EIR

SCH Number: 2009042077**Type:** NOP - Notice of Preparation**Project Description**

The purpose of the MIAD Modification Project is to reduce the seismic and static risk of failure of MIAD. In this way, Reclamation will meet existing standards for dam safety and reduce the risk of injury to those people living and working downstream of the Folsom Dam concerning project impacts to terrestrial vegetation will occur on land owned by the California Department of Parks and Recreation at Mississipp Lake Natoma. The proposed project is a feature of the Folsom Dam Safety of Dams Project, and the analysis will tie from the Marc Dam Safety and Flood Damage Reduction (DS/FDR) Project Final EIS/EIR.

Project Lead Agency

Sacramento Area Flood Control Agency

Contact Information**Primary Contact:**

Pete Ghelfi
Sacramento Area Flood Control Agency
(916) 874-7606
1007 7th Street, 7th Floor
Sacramento, CA 95814

Project Location

County: Sacramento, El Dorado
City: Folsom
Region:
Cross Streets: Green Valley Road and E. Natoma Street
Latitude/Longitude: 38° 41' 57" / 121° 7' 4" [Map](#)
Parcel No:
Township: 10N
Range: 8E
Section: 29
Base:
Other Location Info:

Proximity To

Highways:
Airports:
Railways:
Waterways: Folsom Reservoir, Lower American River
Schools: Folsom Hills Elementary
Land Use: It is occurring on Federal property and therefore there is no zoning

Development Type

Other

Local Action

Other Action

Project Issues

Soil Erosion/Compaction/Grading, Aesthetic/Visual, Air Quality, Archaeologic-Historic, Biological Resources, Drainage/Absorption, Ec
Flood Plain/Flooding, Forest Land/Fire Hazard, Geologic/Seismic, Minerals, Noise, Population/Housing Balance, Public Services, Rec
Solid Waste, Toxic/Hazardous, Traffic/Circulation, Vegetation, Water Quality, Water Supply, Wetland/Riparian, Landuse, Cumulative I

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; Department of Boating and Waterways; Department of Forestry and Fire Protection; Department of Parks and Re
Reclamation Board; Department of Water Resources; Department of Fish and Game, Region 2; Office of Emergency Services; Native
Heritage Commission; State Lands Commission; California Highway Patrol; Caltrans, District 3; State Water Resources Control Board
Water Quality; State Water Resources Control Board, Division of Water Rights; Regional Water Quality Control Bd., Region 5 (Sacra

Date Received: 4/15/2009 **Start of Review:** 4/15/2009 **End of Review:** 5/14/2009

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May 14, 2009

SENT VIA E-MAIL

Mr. Pete Ghelfi
Sacramento Area Flood Control Agency
1007 Seventh Street, Seventh Floor
Sacramento, CA 95814

**Subject: Notice of Preparation for the Environmental Impact Report for Folsom Reservoir
Safety of Dams – Mormon Island Auxiliary Dam
SMAQMD # SAC200801307**

Dear Mr. Ghelfi:

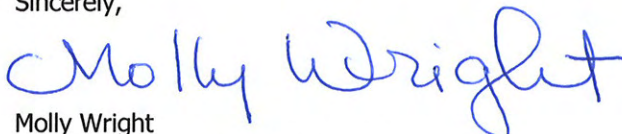
Thank you for providing this project to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for staff review. Staff comments follow.

We believe there may be significant air quality impacts from the construction activities proposed for this project. An air quality analysis should be done on the project to verify the significance of its construction-related air quality impacts. If its impacts are found to be significant, we recommend that our standard construction mitigation measures be applied to the project. These measures include both on-site strategies and a possible off-site mitigation fee. They can be found on our website, www.airquality.org.

We also recommend that the EIR include a discussion of climate change. Construction activities proposed for this project may result in significant greenhouse gas emissions. While there are currently no adopted thresholds of significance for project-related greenhouse gasses, multiple authoritative resource guides exist for addressing greenhouse gas emissions for projects subject to CEQA. The California Air Pollution Control Officers Association (CAPCOA) publication *CAPCOA CEQA & Climate Change* provides guidance on addressing project impacts on climate change through CEQA (www.capcoa.org). Appendix B of this document contains a summary of possible mitigation measures. Additionally, the Governor's Office of Planning and Research (OPR) has issued a technical advisory on this subject, entitled *CEQA and Climate Change: Addressing Climate Change through CEQA Review* (www.opr.ca.gov).

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Sincerely,



Molly Wright
Associate Air Quality Planner / Analyst

c: Larry Robinson, Program Coordinator, SMAQMD

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Gold Fields District
7806 Folsom-Auburn Road
Folsom, CA 95630

May 14, 2009

Pete Ghelfi
Sacramento Area Flood Control Agency
1007 7th Street, 7th Floor
Sacramento, CA 95814

Dear Mr. Gehlfi,

This letter is in response to the Notice of Preparation of a Supplemental Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Folsom Dam Safety of Dams Mormon Island Auxiliary Dam (MIAD) Modification Project. The Gold Fields District of California State Parks manages Folsom Lake State Recreation Area, which includes both Federal and State owned lands around Folsom reservoir and Lake Natoma. State Parks manages the public use, recreation facilities and resources on these federal lands through an agreement with the U.S. Bureau of Reclamation. Below are State Parks comments regarding the scope and content of the supplemental EIS/EIR.

Mitigation at Mississippi Bar

This supplemental EIS/EIR will address vegetation mitigation proposed on State owned land at Mississippi Bar along Lake Natoma. Approximately 70 acres of riparian woodland habitat is needed for the Folsom Dam Safety of Dams Project. State Parks has been working with staff from Reclamation and the Corps on this mitigation proposal. Because the mitigation is a permanent commitment of land for the mitigation purposes, in order to accept off site mitigation, State Parks policies require some clear benefit to the State Park System.

State Parks is still considering what will fully constitute a "clear benefit" to the park unit. State Parks does have some initial ideas and preferences regarding the mitigation which are articulated below. We are also researching what compensation other entities require when accepting mitigation, such as Sacramento County. We will be consulting with the lead agencies for the mitigation project further as we fully develop our requirements.

The entire Mississippi Bar area was mined in the late 19th and early 20th centuries, most notably by large gold mining dredger operations which have left tailing piles of river cobble across much of the area. More recently, the State owned portion of Mississippi Bar was mined for aggregate from 1959 to the early 1990's. As part of the reclamation plan for the aggregate mining, a series of linked lagoons and channels were created which are connected to Lake Natoma. However, much of the property was never restored, including a roughly 40-acre area that was graded flat and is devoid of tailings

and top soil. In addition to the lagoons and the flat area, the balance of the property contains tailing piles with pockets of habitat, including oak woodland and riparian habitat and a few small ponds or seasonal wetlands.

While much of the Mississippi Bar area is undeveloped, existing facilities include: a small equestrian boarding and stable concession located adjacent to the large barren flat area; the Snowberry trailhead and parking area; a portion of the paved bike path which crosses Mississippi Bar; several recognized system single track dirt trails and a number of user-created trails. Existing uses of the area include the equestrian use generated by the stables, other trail uses including road bikes, mountain bikes, pedestrians and equestrians on the trails in the area. Canoes and kayaks tour the lagoons and channels and anglers fish in these same ponds. There is a lot of informal use of the general area by the immediate community for walking dogs, jogging and walking.

The development and management of Folsom Lake SRA is guided by a General Plan. State Parks and Reclamation have been working on an updated General Plan/Resource Management Plan which should be finalized and approved by the end of calendar year 2009. This new Plan provides specific direction regarding the development and management of the Mississippi Bar area. This direction includes restoration of riparian and floodplain habitat in those portions of the area which have not recovered (and are not likely to recover without active restoration) from past aggregate mining activities. The Plan also provides for the development of new day use facilities including picnic sites, restrooms, limited vehicle access and parking, expansion of the existing system of lagoons and channels for canoes and kayaks, development of additional trails, potential improvements associated with the horse stable concession, and the interpretation of the cultural resources in the area including the historic gold mining dredger tailings.

Land Form Restoration of the Large Flat

Given the above existing situation, uses and plans State Parks is most interested in focusing much of the proposed mitigation on the large flat which is unlikely to recover without active restoration. State Parks believes that the mitigation in this area would need to include excavation and grading to create topography, possible restoration of natural drainage patterns, importation of top soil and planting riparian woodland species. There are a few small pockets of mature cottonwoods in this area which need to be protected and incorporated into the mitigation and restoration design for this area.

Expanding the Lagoons and Channel and Creating a Paddling Loop

Another key interest of State Parks in this mitigation proposal is expanding the existing series of channels and lagoons originally created by the aggregate mining company as part of their site reclamation. These lagoons and channels are currently connected to the main body of Lake Natoma through several culverts, including a 20-foot culvert under the paved bike path, which permits canoes and kayaks to enter the lagoon area. This is a popular recreation use of the area. Riparian vegetation and habitat, including cattails and willows, ring these ponds and channels. State Parks would like to see the proposed mitigation include a second over-sized culvert as part of expanding the ponds and channels creating a "paddling loop" through the area. State Parks believes the expansion of the ponds and channels will not only create additional recreation opportunity, it could also create additional riparian habitat along the fringe of the ponds.

Site Planning which Considers Future Recreation Facilities

Because new recreational uses and facilities are proposed for the Mississippi Bar area, mitigation planning will need to consider where these future recreational facilities and uses will be located and accommodated. Some level of specific site planning for the area will be required. This site planning in particular needs to consider access roads, parking areas, picnic sites and trails. The areas to be set aside for these future facilities need to be incorporated into the mitigation plans.

State Parks not to Bear Cost of Maintaining Mitigation Vegetation

Presuming an agreeable plan can be developed for the mitigation at Mississippi Bar, State Parks would not be responsible for any of the costs of constructing or maintaining this mitigation in the future.

Funding to Support State Parks Staff in Developing Mitigation Plans

State Parks will require some funding to support the time of several key staff positions to help develop and review the details of the mitigation project planning.

Mormon Island Auxiliary Dam Modifications

The supplemental EIS/EIR will also address the dam safety modifications to be made to MIAD. State Parks understands that this may involve excavating and filling a good portion of the area between the existing dam and Green Valley Road, possibly even requiring realignment of a section of the roadway. We also understand that there may be the need to develop settling ponds at the Mormon Island Wetland Natural Preserve on the south side of Green Valley Road to accommodate water that would be pumped from the excavation work at MIAD. These ponds may be converted into wetlands at the end of the project. State Parks has several comments and concerns regarding this aspect of the project.

Parking and Trails

State Parks has an existing parking lot on the east end of MIAD which serves as trail access for trails heading across the top of MIAD to Folsom Point and the trail which heads east toward Browns Ravine. The modifications of MIAD will likely temporarily close this parking area to public use and close trail access across the top of MIAD during construction. State Parks believes these impacts to parking and trail use need to be mitigated.

Given the physical constraints of the reservoir, the MIAD construction area and Green Valley Road, it is not possible to re-route trail traffic around the construction site. However, there are nearby options to mitigate the loss of parking and trail opportunity. Additional parking for trail access could be developed at Browns Ravine. This would provide access to the trail between Browns Ravine and MIAD. Additional trail opportunities to replace the loss of the trail across MIAD during construction could be developed at Mormon Island Wetlands or a short trail loop could be created between MIAD and Browns Ravine. Please see the attached map which displays these trail mitigation options. State Parks is willing to consider other ideas to mitigate the loss of the use of the trails.

We expect at the end of the MIAD project, the parking area would be restored and repaired as needed for public use and trail access across MIAD would be re-established.

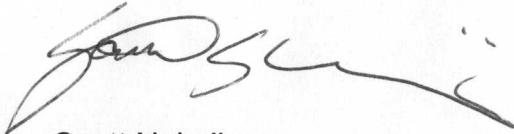
Mormon Island Wetlands Natural Preserve

State Parks manages the federal lands within Folsom Lake SRA through an agreement with Reclamation. Within the larger State Recreation Area, State Parks has designated some specific limited areas as Natural Preserves, which is a designation used to provide a higher level protection to areas with specific unique resources within a State Park unit. The Mormon Island Wetland Natural Preserve is an area with this Natural Preserve designation. The specific resources for which the Preserve was designated are riparian habitat, wetlands and vernal pools. According to the California Public Resources Code, these areas are to be managed to protect the resources for which they were designated and manipulation of the habitat is to be permitted only in those areas where scientific analysis indicates manipulation is necessary to preserve the species or associations that constitute the basis for the establishment of the natural preserve.

State Parks recognizes the Mormon Island Wetlands Natural Preserve, a State designation, is on federal land which was acquired for the purposes of the Folsom Dam Project. Our request is that work within the Natural Preserve area be limited to the minimum necessary to complete the MIAD Modification Project and that any areas disturbed are restored to habitat or uses appropriate for the Natural Preserve designation. State Parks is interested in providing input into the planning for any mitigation, restoration or modification of the Natural Preserve.

If you have any further questions regarding this matter, please contact the Gold Fields District Planner Jim Micheaels at (916) 988-0513. Thank you.

Sincerely,



Scott Nakaji
District Superintendent

CC Michael Finnegan, Area Manager
U.S. Bureau of Reclamation
Central California Area Office
7794 Folsom Dam Road
Folsom, CA 95630



EL DORADO COUNTY
ENVIRONMENTAL MANAGEMENT
PLACERVILLE OFFICE
2850 FAIRLANE CT, BLDG C
PLACERVILLE, CA 95667
PHONE: (530) 621-5300
FAX: (530) 642-1531

Interoffice Memorandum

5/13/09

To: Pete Ghelfi
Sacramento Area Flood Control Agency
ghelfip@SacCounty.net

From: El Dorado County
Environmental Management Dept.

Subject: MORMON ISLAND AUXILIARY DAM MODIFICATION PROJECT

Environmental Management Department staff has reviewed the subject application. The following comments reflect our concerns and requirements:

Environmental Health (Cathy Toft x 6651):

No Comments.

Air Quality Management (Dennis Otani x 5804):

The El Dorado County Air Quality Management District (AQMD) has been asked to express comments which identify our concerns regarding the **Notice of Intent to Prepare a Supplemental EIS/EIR for the Mormon Island Auxiliary Dam Modification Project, dated April 15, 2009**. The proposed Folsom Dam Safety of Dams Mormon Island Auxiliary Dam (MIAD) Modification project is to reduce the seismic and static risk of failure of MIAD. The project is a feature of the Folsom Dam Safety of Dams Project, and the analysis will tier from the March 2007 Folsom Dam Safety and Flood damage Reduction (DS/FDR) Project Final EIS/EIR.

The AQMD has reviewed the **Notice of Intent to Prepare a Supplemental EIS/EIR for the Mormon Island Auxiliary Dam Modification Project, dated April 15, 2009**. The AQMD has determined the project would have a significant impact on the air quality. The following summary of issues **SHALL** be addressed:

1. The project construction will involve grading and excavation operations, which will result in a temporary negative impact on air quality with regard to the release of Reactive Organic Gases (ROG), Nitrogen Oxides (NOx) and particulate matter

(PM₁₀) in the form of dust. The project emissions of ROG, NO_x need to be quantified using the most current model of URBEMIS or a similar model that is acceptable to the AQMD. Current county records indicate this property is not located within the Asbestos Review Area **but** due to the recent positive asbestos soil sampling results (14 positive samples for asbestos -copy of letter, dated January 4, 2006 from Jared Vauk, enclosed) the project shall comply with AQMD Rule 223.2 Fugitive Dust-Asbestos Hazard Mitigation, which addresses the regulations and mitigation measures for fugitive dust emissions, shall be adhered to during the construction process. Mitigation measures for the control of fugitive dust shall comply with the requirements of Rule 223.2. In addition, an **Asbestos Dust Mitigation Plan (ADMP) Application with appropriate fees shall be submitted to and approved by the AQMD prior to start of project construction..**

2. Project construction may involve road development and **should adhere** to AQMD **Rule 224 Cutback and Emulsified Asphalt Paving Materials.**
3. Burning of wastes that result from "Land Development Clearing" must be permitted through the AQMD. Only vegetative waste materials may be disposed of using an open outdoor fire.
4. The AQMD's goal is to strive to achieve and maintain ambient air quality standards established by the U.S. Environmental Protection Agency and the California Air Resources Board and to minimize public exposure to toxic or hazardous air pollutants and air pollutants that create unpleasant odors. The following are measures used to reduce impacts on air quality from equipment exhaust emissions:

Heavy Equipment and Mobile Source Mitigation Measures.

- Use low-emission on-site mobile construction equipment.
- Maintain equipment in tune per manufacturer specifications.
- Retard diesel engine injection timing by two to four degrees.
- Use electricity from power poles rather than temporary gasoline or diesel generators.
- Use reformulated low-emission diesel fuel.
- Use catalytic converters on gasoline-powered equipment.
- Substitute electric and gasoline-powered equipment for diesel-powered equipment where feasible.
- Do not leave inactive construction equipment idling for prolonged periods (i.e., more than two minutes).
- Schedule construction activities and material hauls that affect traffic flow to off-peak hours.
- Configure construction parking to minimize traffic interference.
- Develop a construction traffic management plan that includes, but is not limited to: Providing temporary traffic control during all phases of construction activities to improve traffic flow; Rerouting construction trucks off congested streets; and provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.

5. Prior to construction/installation of any new point source emissions units or non-permitted emission units (i.e., gasoline dispensing facility, boilers, internal combustion engines, etc.), authority to construct applications shall be submitted to the AQMD. Submittal of applications shall include facility diagram(s), equipment specifications and emission factors.

The above AQMD rules are found in the El Dorado County Air Pollution Control District Rules and Regulations. A copy of the AQMD Rules and Regulations is available at our Department or from the Department's web page located at the following internet address: www.co.el-dorado.ca.us/emd.

If you have any questions regarding these comments, please do not hesitate to telephone our office at (530) 621-6662.

Hazardous Materials (Dave Johnston x 5896):

No comments.

**EL DORADO
COUNTY**



**ENVIRONMENTAL
MANAGEMENT
DEPARTMENT**

*Environmental
Health Division*

*Air Quality
Management
District*

*Solid Waste &
Hazardous
Materials
Divisions*

Vector Control



**PLACERVILLE
OFFICE**

2850 Fairlane Ct.
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Placerville, CA 95667

Ph. 530.621.5300
Fax. 530.642.1531
Fax. 530.626.7130

**SOUTH LAKE
TAHOE OFFICE**

3368 Lake Tahoe Blvd.
Ste 303
South Lake Tahoe, CA
96150

Ph. 530.573.3450
Fax. 530.542.3364

COUNTY OF EL DORADO

ENVIRONMENTAL MANAGEMENT DEPARTMENT

December 7, 2007

John Wondolleck
Senior Project Manager
CDM
2295 Gateway Oaks Drive, Suite 240
Sacramento, CA 95833

RE: NOA Geologic Evaluation for Folsom Dam Safety and Flood Damage Reduction Project
Exemption Request

On November 8, 2007, the El Dorado County Air Quality Management District (AQMD) received your letter, which included the Borrow Site Characterization Report: Amphibolite schist along the southern shoreline of Folsom Reservoir (Asbestos Report) and the expert opinion paper prepared by RJ Lee Group, Inc (RJLG). In the letter you request exemption for the Folsom Dam project from AQMD Rule 610 Land Development Fees and from Section 93105 (Asbestos ATCM for Construction, Quarrying, and Surface Mining Operations). The reason for the exemption request from Section 93105 is the information presented in the RJLG expert opinion paper, which disputes previous findings of asbestos on the project site and claims that the particles observed do not meet the definition of asbestos.

The AQMD has reviewed the letter including the attached technical information. We noted that you have not requested exemption from AQMD Rule 223-2 Fugitive Dust – Asbestos Hazard Mitigation (Attachment 1), which in El Dorado County supersedes requirements of the Asbestos ATCM. For your information, Rule 223-2 applies to any construction or construction related activity, which exceeds 20 cubic yards and that is either located within designated Naturally Occurring Asbestos (NOA) Review Areas on the current El Dorado County NOA Review Map, or where NOA is discovered (223-2.1.B) on the project site. Your project became subject to the AQMD Rule 223-2 on January 4, 2006, when the Bureau of Reclamation reported findings of NOA (fibrous actinolite) to the AQMD (Attachment 2) in 14 out of 14 samples taken from trenches DT-05-700 to DT-05-900. The inconsistent results provided to the AQMD confirm the variable geologic conditions that can occur at a site. Based on the local geology and your results, the AQMD believes that your project area does contain asbestos.

Prior to starting your project, per the requirements of AQMD Rule 223-2 please submit a completed Asbestos Dust Mitigation Plan (ADMP) with appropriate application fees. If excavated soils will be exported from the project, representative samples must be collected and analyzed using CARB Test Method 435 as specified in Section 94147. For more information on fugitive dust and NOA hazard mitigation requirements for construction activities in El Dorado County see the AQMD website at: http://www.co.el-dorado.ca.us/emd/apcd/construction_dust_rules.html.

Your request for waiver of fees, Rule 610 Land Development Fees, cannot be granted at the staff level, but must be approved by the AQMD Board of Directors. Please contact Carolyn Craig, AQ Engineer, at 530-621-6649 or Robert Lauritzen, County Geologist, at 530-621-5130, if you have any questions or require additional information.

Sincerely,

Marcella McTaggart
Air Pollution Control Officer

John Wodolleck
December 7, 2007
Page 2

Attachments:

- (1) AQMD Rule 223-2 Fugitive Dust – Asbestos Hazard Mitigation
- (2) Written report of NOA discovery by the USBR, dated January 4, 2006

cc: Helen Baumann – EDC District 2 Supervisor, Chair AQMD Board of Directors
Laura Gill – EDC Chief Executive Officer
Jared Vauk – Engineering Geologist, Bureau of Reclamation
Jeff Cook – Chief, Monitoring and Laboratory Division, CARB
Jeffrey Wright – Manager, Monitoring and Laboratory Division
Robert Krieger – Manager, Stationary Source Division, CARB
Larry Greene – Air Pollution Control Officer, Sacramento Metropolitan AQMD
David Grose – Stationary Source Division Manager, Sacramento Metropolitan AQMD



United States Department of the Interior

BUREAU OF RECLAMATION
Central California Area Office
7794 Folsom Dam Road
Folsom, California 95630-1799

IN REPLY REFER TO:

CC-419
ENV-1.00

FEB 12 2008

RECEIVED

FEB 13 2008

AQMD

Mrs. Marcella McTaggart
Air Pollution Control Officer
El Dorado County Air Quality Management District
2850 Fairlane Court, Bldg. C
Placerville, CA 95667

Subject: Naturally Occurring Asbestos Geologic Evaluation for Folsom Dam Safety and Flood Damage Reduction Project

Dear Mrs. McTaggart:

Thank you for your review of the "Folsom Facility and Reservoir Borrow Site Characterization Report: Amphibolite Schist along the Southern Shoreline of Folsom Reservoir (Asbestos Report)", October 2007 and request for an exemption from Section 93105 (Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations). The U.S. Department of the Interior, Bureau of Reclamation understands that the request for an exemption for the Folsom Dam Safety and Flood Damage Reduction Project has been denied. Reclamation will not be working with El Dorado County for Phase 1 of the Folsom Dam Safety and Flood Damage Reduction Project and will not submit an Asbestos Dust Mitigation Plan at this time. In the future phases of the project, Reclamation will develop and implement the appropriate plan if it is determined that work in El Dorado County will be necessary. We appreciate your guidance and look forward to working with you in the future.

If you have any questions, please contact Elizabeth Vasquez at 916-989-7192.

Sincerely,

Michael R. Finnegan
Area Manager

ACTING FOR



IN REPLY
REFER TO:

United States Department of the Interior

BUREAU OF RECLAMATION
Mid-Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825-1898

Contact list Bureau of Reclamation (Sacramento/ Folsom Reservoir)

Jared Vauk
Engineering Geologist
2800 Cottage Way, MP-230
Sacramento CA 95825
(916) 978-5328
JVAUK@mp.usbr.gov

Steve Sherer
Senior Engineering Geologist
2800 Cottage Way, MP-230
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sherer@mp.usbr.gov

Shawn Oliver
Environmental Specialist
7794 Folsom Dam Road
Folsom CA 95630
916-989-7256
SOLIVER@mp.usbr.gov



United States Department of the Interior

BUREAU OF RECLAMATION
Mid-Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825-1898

IN REPLY
REFER TO:
January 4th, 2006

El Dorado Air Quality Management District
Carolyn Craig
2850 Fairlane Ct.
Placerville CA 95667

RECEIVED

JAN 06 2006

AQMD

Dear Mrs. Craig and AQMD representatives,

The Bureau of Reclamation recently excavated three trenches along the reservoir rim of Folsom Reservoir within El Dorado County (see attached location maps). Fourteen (14) soil samples from the trenches were sent to Asbestech (private laboratory) for asbestos testing. All samples submitted were found to have <1% Fibrous Actinolite. The three trenches are not in a "naturally occurring asbestos area" on maps provided by El Dorado AQMD web site.

As required by the California Air Resources Board ATCM, Jared Vauk (Engineering Geologist with the Bureau of Reclamation) contacted Carolyn Craig on 1/4/2005 to inform El Dorado Air Quality Management District that we had received lab test data indicating positive test results for the presence of asbestos. A copy of the lab report is attached.

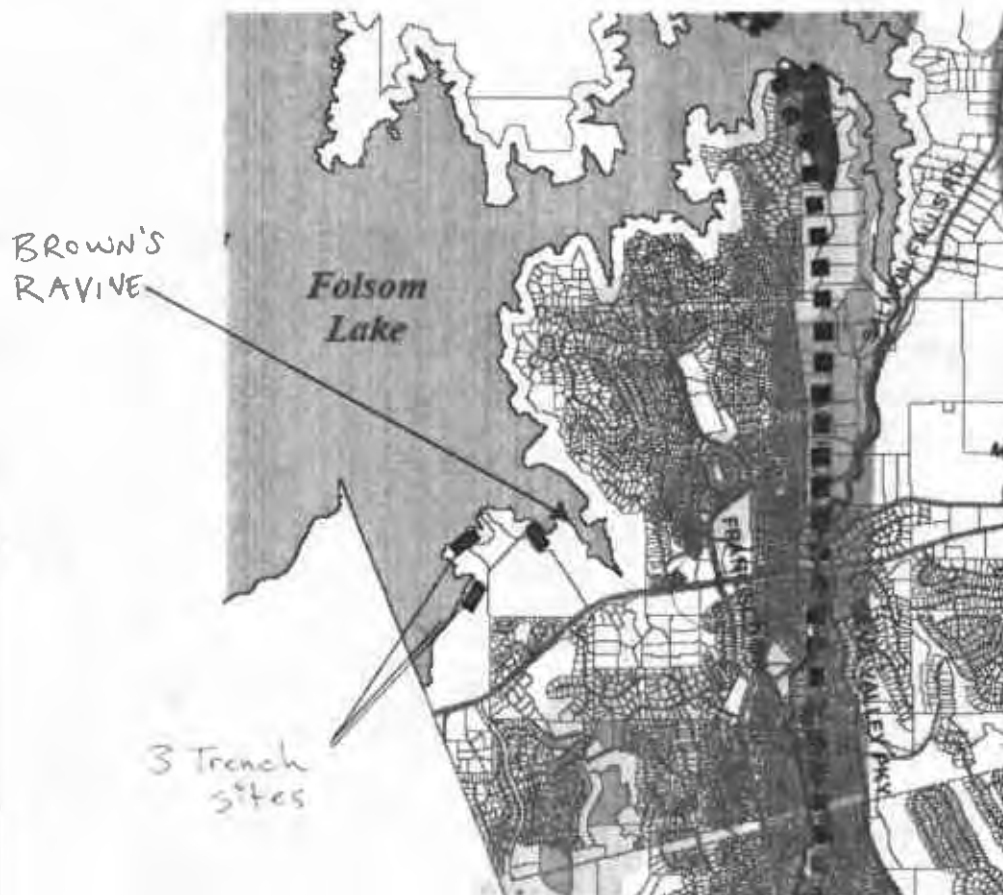
The trenches were preformed by Bureau of Reclamation for geologic investigations of potential borrow material availability around the rim of Folsom Reservoir. The Bureau of Reclamation was determining material types and physical properties of the bedrock around Folsom Reservoir.

We ask that El Dorado Air Quality Management District assign the Bureau of Reclamation a point of contact to facilitate continued compliance with asbestos regulations.

Sincerely,

Jared Vauk

El Dorado County NOA map



ASBESTECH
6825 Fair Oaks Blvd., Suite 103
Carmichael, California 95608
Tel.(916) 481-8902 Fax (916) 481-3975

Client:

Bureau of Reclamation
2800 Cottage Way, MP-230
Sacramento, Ca 95825

Job:

Borrow Investigations
Brown's Ravine

BULK ASBESTOS ANALYSIS REPORT

LAB JOB # 47681-1

Date/Time Collected: 12/22/05

Date Received: 12/22/05

NVLAP # 101442

DOHS # 1153

Date Analyzed: 12/28/05

<u>Sample No.</u>	<u>Color/Description</u>	<u>% Type Asbestos</u>	<u>Other Materials</u>
1-A-700	Trench DT-05-700 (0.0-1.5 ft.) Brown soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
2-A-700	Trench DT-05-700 (5.0-7.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
3-A-700	Trench DT-05-700 (10.0-12.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
4-A-700	Trench DT-05-700 (16.0-18.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
1-A-800	Trench DT-05-800 (0.0-1.5 ft.) Brown soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
2-A-800	Trench DT-05-800 (4.0-6.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
3-A-800	Trench DT-05-800 (9.0-11.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite

THE ANALYSIS USES POLARIZED LIGHT MICROSCOPY AND DISPERSION STAINING FOLLOWING E.P.A. METHOD 600/R-93/116. NON-FRIABLE MATERIALS WERE ANALYZED APPLYING THE SAME METHOD. THE LOWER DETECTION LIMIT IS <1 % WITH THE PROVISIO THAT PLM MAY NOT DETECT FIBERS <0.25 MICRONS IN DIAMETER THAT MAY BE PRESENT IN SAMPLES SUCH AS FLOOR TILES. IN ACCORDANCE WITH TITLE 22, CCR, SECTION 66261.24(a)(2)(A), THE MCL IS 1%. SAMPLES WERE NOT COLLECTED BY ASBESTECH. THIS REPORT MUST NOT BE REPRODUCED EXCEPT IN FULL WITHOUT THE APPROVAL OF ASBESTECH. THIS REPORT RELATES ONLY TO THE ITEMS TESTED. THIS REPORT MUST NOT BE USED TO CLAIM PRODUCT ENDORSEMENT BY N.V.L.A.P. OR ANY AGENCY OF THE U.S. GOVERNMENT. ASBESTECH ACCEPTS TECHNICAL RESPONSIBILITY FOR THIS REPORT AND DATE OF ISSUE.

NVLAP

ANALYST SIGNATURE: _____

[Handwritten Signature]

ASBESTECH
6825 Fair Oaks Blvd., Suite 103
Carmichael, California 95608
Tel.(916) 481-8902 Fax (916) 481-3975

Client:

Bureau of Reclamation
2800 Cottage Way, MP-230
Sacramento, Ca 95825

Job:

Borrow Investigations
Brown's Ravine

BULK ASBESTOS ANALYSIS REPORT

LAB JOB # 47681-2
Date/Time Collected: 12/22/05
Date Received: 12/22/05

NVLAP # 101442
DOHS # 1153
Date Analyzed: 12/28/05

<u>Sample No.</u>	<u>Color/Description</u>	<u>% Type Asbestos</u>	<u>Other Materials</u>
4-A-800	Trench DT-05-800 (15.0-17.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
5-A-800	Trench DT-05-800 (17.5-18.5 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
1-A-900	Trench DT-05-900 (0.0-1.0 ft.) Brown soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
2-A-900	Trench DT-05-900 (4.0-6.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
3-A-900	Trench DT-05-900 (9.0-10.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
4-A-900	Trench DT-05-900 (15.0-17.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
5-A-900	Trench DT-05-900 (19.0-20.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite

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NVLAP

ANALYST SIGNATURE: _____



**EL DORADO
COUNTY**



**ENVIRONMENTAL
MANAGEMENT
DEPARTMENT**

*Environmental
Health Division*

*Air Quality
Management
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*Solid Waste &
Hazardous
Materials
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Vector Control



**PLACERVILLE
OFFICE**

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COUNTY OF EL DORADO

ENVIRONMENTAL MANAGEMENT DEPARTMENT

December 7, 2007

John Wondolleck
Senior Project Manager
CDM
2295 Gateway Oaks Drive, Suite 240
Sacramento, CA 95833

RE: NOA Geologic Evaluation for Folsom Dam Safety and Flood Damage Reduction Project
Exemption Request

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Your request for waiver of fees, Rule 610 Land Development Fees, cannot be granted at the staff level, but must be approved by the AQMD Board of Directors. Please contact Carolyn Craig, AQ Engineer, at 530-621-6649 or Robert Lauritzen, County Geologist, at 530-621-5130, if you have any questions or require additional information.

Sincerely,

Marcella McTaggart
Air Pollution Control Officer

John Wodolleck
December 7, 2007
Page 2

Attachments:

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Laura Gill – EDC Chief Executive Officer
Jared Vauk – Engineering Geologist, Bureau of Reclamation
Jeff Cook – Chief, Monitoring and Laboratory Division, CARB
Jeffrey Wright – Manager, Monitoring and Laboratory Division
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United States Department of the Interior

BUREAU OF RECLAMATION
Central California Area Office
7794 Folsom Dam Road
Folsom, California 95630-1799

IN REPLY REFER TO:

CC-419
ENV-1.00

FEB 12 2008

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FEB 13 2008

AQMD

Mrs. Marcella McTaggart
Air Pollution Control Officer
El Dorado County Air Quality Management District
2850 Fairlane Court, Bldg. C
Placerville, CA 95667

Subject: Naturally Occurring Asbestos Geologic Evaluation for Folsom Dam Safety and Flood Damage Reduction Project

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If you have any questions, please contact Elizabeth Vasquez at 916-989-7192.

Sincerely,

Michael R. Finnegan
Area Manager

ACTING FOR



IN REPLY
REFER TO:

United States Department of the Interior

BUREAU OF RECLAMATION
Mid-Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825-1898

Contact list Bureau of Reclamation (Sacramento/ Folsom Reservoir)

Jared Vauk
Engineering Geologist
2800 Cottage Way, MP-230
Sacramento CA 95825
(916) 978-5328
JVAUK@mp.usbr.gov

Steve Sherer
Senior Engineering Geologist
2800 Cottage Way, MP-230
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sherer@mp.usbr.gov

Shawn Oliver
Environmental Specialist
7794 Folsom Dam Road
Folsom CA 95630
916-989-7256
SOLIVER@mp.usbr.gov



United States Department of the Interior

BUREAU OF RECLAMATION
Mid-Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825-1898

IN REPLY
REFER TO:
January 4th, 2006

El Dorado Air Quality Management District
Carolyn Craig
2850 Fairlane Ct.
Placerville CA 95667

RECEIVED

JAN 06 2006

AQMD

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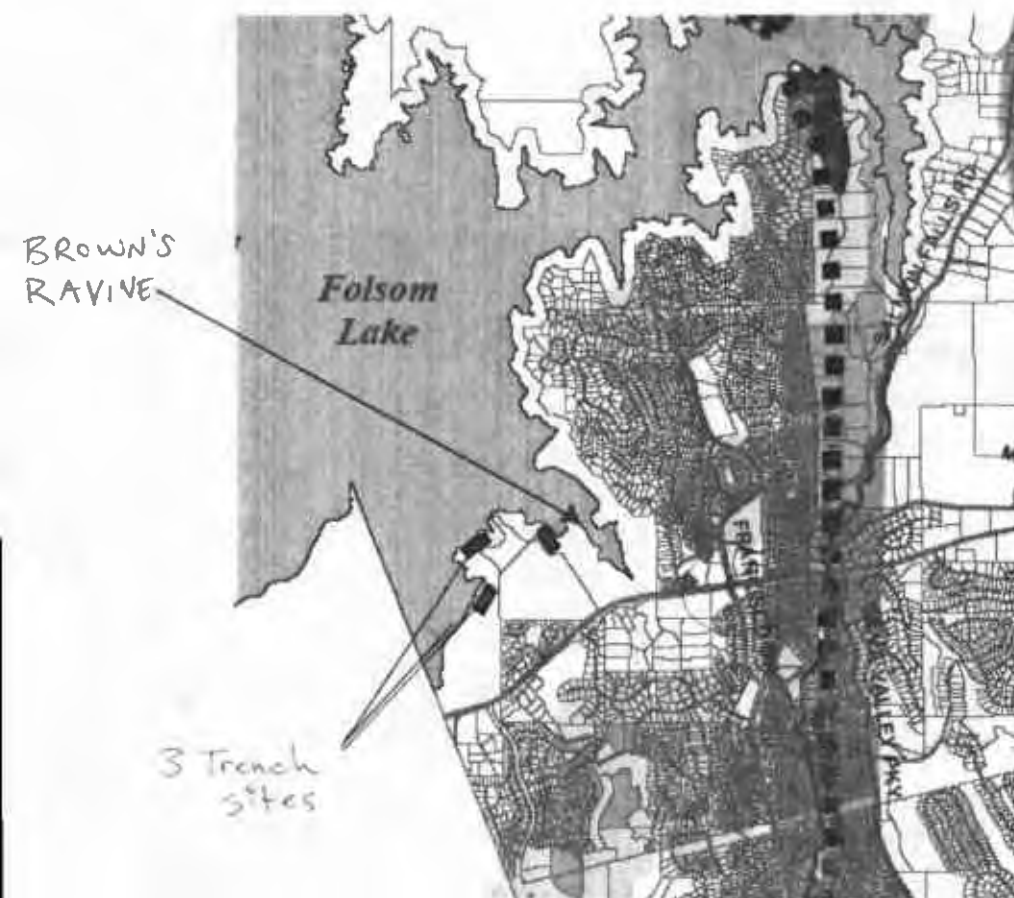
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We ask that El Dorado Air Quality Management District assign the Bureau of Reclamation a point of contact to facilitate continued compliance with asbestos regulations.

Sincerely,

Jared Vauk

El Dorado County NOA map



ASBESTECH
6825 Fair Oaks Blvd., Suite 103
Carmichael, California 95608
Tel.(916) 481-8902 Fax (916) 481-3975

Client:

Bureau of Reclamation
2800 Cottage Way, MP-230
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Job:

Borrow Investigations
Brown's Ravine

BULK ASBESTOS ANALYSIS REPORT

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2-A-800	Trench DT-05-800 (4.0-6.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
3-A-800	Trench DT-05-800 (9.0-11.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite

THE ANALYSIS USES POLARIZED LIGHT MICROSCOPY AND DISPERSION STAINING FOLLOWING E.P.A. METHOD 600/R-93/116. NON-FRIABLE MATERIALS WERE ANALYZED APPLYING THE SAME METHOD. THE LOWER DETECTION LIMIT IS <1 % WITH THE PROVISIO THAT PLM MAY NOT DETECT FIBERS <0.25 MICRONS IN DIAMETER THAT MAY BE PRESENT IN SAMPLES SUCH AS FLOOR TILES. IN ACCORDANCE WITH TITLE 22, CCR, SECTION 66261.24(a)(2)(A), THE MCL IS 1%. SAMPLES WERE NOT COLLECTED BY ASBESTECH. THIS REPORT MUST NOT BE REPRODUCED EXCEPT IN FULL WITHOUT THE APPROVAL OF ASBESTECH. THIS REPORT RELATES ONLY TO THE ITEMS TESTED. THIS REPORT MUST NOT BE USED TO CLAIM PRODUCT ENDORSEMENT BY N.V.L.A.P. OR ANY AGENCY OF THE U.S. GOVERNMENT. ASBESTECH ACCEPTS TECHNICAL RESPONSIBILITY FOR THIS REPORT AND DATE OF ISSUE.

NVLAP

ANALYST SIGNATURE: _____



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Carmichael, California 95608
Tel.(916) 481-8902 Fax (916) 481-3975

Client:

Bureau of Reclamation
2800 Cottage Way, MP-230
Sacramento, Ca 95825

Job:

Borrow Investigations
Brown's Ravine

BULK ASBESTOS ANALYSIS REPORT

LAB JOB # 47681-2
Date/Time Collected: 12/22/05
Date Received: 12/22/05

NVLAP # 101442
DOHS # 1153
Date Analyzed: 12/28/05

<u>Sample No.</u>	<u>Color/Description</u>	<u>% Type Asbestos</u>	<u>Other Materials</u>
4-A-800	Trench DT-05-800 (15.0-17.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
5-A-800	Trench DT-05-800 (17.5-18.5 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
1-A-900	Trench DT-05-900 (0.0-1.0 ft.) Brown soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
2-A-900	Trench DT-05-900 (4.0-6.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
3-A-900	Trench DT-05-900 (9.0-10.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
4-A-900	Trench DT-05-900 (15.0-17.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite
5-A-900	Trench DT-05-900 (19.0-20.0 ft.) Tan soil	<1 FIBROUS ACTINOLITE	Granular Mins. NonFibrous Actinolite

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