Appendix B
Responses to Comments on the Draft RMP/EIS

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B.1 INTRODUCTION

In July 2008, the U.S. Bureau of Reclamation (Reclamation) circulated a Draft Environmental Impact Statement (EIS) that was prepared to describe the potential environmental impacts of the implementing the Cachuma Lake Resource Management Plan (RMP). The purpose of the RMP is to provide a program and set of policy guidelines necessary to encourage orderly use, development, and management of the Cachuma Lake Recreation Area (Plan Area), which encompasses Cachuma Lake, the 75-acre County Park on the south side of the lake, and the surrounding shores and rugged hillsides. The RMP, which will have a planning horizon of 20 years, will address the following needs:

- Ensuring timely delivery of high-quality water to water users while enhancing natural resources and recreational opportunities
- Providing recreational opportunities to meet the demands of a growing, diverse population
- Ensuring recreational diversity and the quality of the recreational experience
- Protection of natural and cultural resources, while educating the public to their value and good stewardship
- Providing the framework for establishing a new management agreement with a managing partner.

The RMP was developed and combined in this volume with the EIS to comply with the National Environmental Policy Act (NEPA).

B.1.1 Public Comment Period

The public review period for the Draft RMP/EIS began on July 25, 2008, and was initially set to end on September 23, 2008. Due to considerable public interest in the RMP, Reclamation extended the comment period through October 31, 2008, for a total review period of 99 days. Notice of the extension was issued by press release on September 11, 2008, by postcard to the project mailing list on September 17, 2008, and by notice in the Federal Register on October 9, 2008 (73 Federal Register 197: 59669).

During the comment period, the Draft EIS was available for review at the Reclamation Mid-Pacific Regional Library in Sacramento, CA; the Reclamation South-Central California Area Office in Fresno, CA; the Cachuma Lake State Recreation Area park headquarters in Santa Barbara, CA; the Santa Maria Public Library in Santa Maria, CA; the Santa Barbara Public Library in Santa Barbara, CA; the Reclamation Denver Office Library, Denver, CO; Natural Resources Library, U.S. Department of the Interior, Washington, DC; and the project website (http://www.usbr.gov/mp/nepa/nepa_projdetails.cfm?Project_ID=283).

Written comments on the Draft EIS were submitted by federal, state, regional, and local agencies; organizations; and individuals. The comments, along with responses from Reclamation, are presented in Sections B.2 through B.7 of this appendix.

B.1.2 Public Hearing

Two public hearings were held for the Draft RMP/EIS. The first was on Tuesday, August 26, 2008, from 6:30 to 9 PM at the Veterans Memorial Hall, 1745 Mission Drive, Solvang, CA. The hearing was advertised by public notices in the *Santa Barbara News Press* and the Santa Maria Times. Reclamation also sent notices to people who had signed attendance sheets at previous public meetings about the project (described in Section 2.2.4 of the RMP) or requested notification in writing.

The purpose of the hearing was to inform the public of the proposed actions and alternatives for the RMP and to receive public comments. A slideshow was presented to summarize the RMP and the NEPA process. Information stations staffed by personnel from Reclamation and their consultant URS were provided to describe the study area and WROS designations for each alternative, management actions for each alternative, and impacts for each alternative. Forty-three people registered on the sign-in sheet for the hearing.

Due to considerable public interest in the RMP, Reclamation in cooperation with the Carpinteria Valley Water District held a second public hearing on Wednesday, October 8, 2008, from 6:30 to 9 PM at the City of Carpinteria Council Chambers, Carpinteria, CA. The Carpinteria Water District coordinated public notification of the meeting. Three people registered on the sign-in sheet for the hearing.

Written comments received from the public hearings are presented and responded to in Section B.6 of this appendix. Spoken comments received during the hearings are summarized and responded to in Section B.7.

B.2 COMMENTS FROM FEDERAL AGENCIES

F-1 U.S. Environmental Protection Agency, Kathleen Goforth

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

October 30, 2008

Robert Epperson
Bureau of Reclamation
U.S. Department of the Interior
1243 N. Street
Fresno, CA 93721

Subject: Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for Cachuma Lake, Santa Barbara County, California (CEQ# 20080293)

Dear Mr. Epperson:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The Cachuma Lake Resource Management Plan/Environmental Impact Statement (RMP/EIS) will establish management objectives, guidelines, and actions for Cachuma Lake and surrounding federal lands for the next 20 years. EPA supports the development of a comprehensive RMP to guide future management actions. EPA commends the efforts by the Bureau of Reclamation (Reclamation) to address key resource management issues such as (1) the increasing demand for use of trails, campsites, facilities, and the lake, and (2) the presence of unique vegetation and wildlife, including special-status species. We acknowledge Reclamation's commitment to avoid and minimize impacts to rare plants and oak trees when possible and implement specific mitigation measures.

F-1-1 While there are positive management goals proposed in the RMP, we have rated the Draft EIS as Environmental Concerns – Insufficient Information (EC-2) (see the enclosed "Summary of Rating Definitions"). The rating is due to the need for additional information and analysis regarding potential air and water quality effects from proposed activities. We recommend the Final EIS demonstrate general conformity to the applicable State Implementation Plan and include a detailed list of air quality mitigation measures for construction projects that will be incorporated as appropriate. EPA also recommends including current data and analysis of the cumulative impacts that increased boating may have on water quality. While we recognize the programmatic nature of this Draft EIS, we recommend the Final EIS provide additional data and more specific information regarding these issues to ensure all relevant effects are considered. Our detailed comments are enclosed.

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F-1-1, Cont.

We appreciate the opportunity to review this Draft EIS. When the Final EIS is released for public review, please send one hard copy and one CD ROM to the address above (mail code: CED-2). If you have questions, please contact me at (415) 972-3521, or Jennifer Blonn, the lead reviewer for this project. Jennifer can be reached at (415) 947-4109 or blonn.jennifer@epa.gov.

Sincerely,

Kathleen M. Goforth, Manager
Environmental Review Office (CED-2)

Enclosures: ~~rec'd~~
Summary of EPA Rating Definitions
Detailed Comments

SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

EPA DETAILED COMMENTS ON THE DRAFT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT FOR CACHUMA LAKE, SANTA BARBARA COUNTY, CALIFORNIA, OCTOBER 30, 2008

Air Quality

Demonstrate general conformity to the applicable State Implementation Plan. The Draft Environmental Impact Statement (EIS) does not appear to evaluate whether the direct and indirect emissions from the federal action conform to the applicable State Implementation Plan (SIP) as required by the General Conformity Rule (40 CFR 93.150).

Recommendation:

F-1-2

- Include in the Final EIS a description of the General Conformity regulatory framework and how it applies to the proposed Resource Management Plan (RMP) and future project-specific implementation. The Final EIS should demonstrate conformity for all pollutants for which Santa Barbara County and the South Central Coast Air Basin are in nonattainment or maintenance status. Conformity may be demonstrated by a showing that the total direct and indirect emissions from the action are specifically identified and accounted for in the SIP.
- If analysis of general conformity to the SIP is more appropriate at the project-specific analysis level, we recommend the Final EIS include a specific commitment to future project-specific general conformity analysis.

Describe and commit to air quality mitigation measures during future project-specific construction. Cachuma Lake and surrounding federal land (Plan Area) are located in a nonattainment area for the state 8-hour ozone standard and the state particulate matter 10 microns or less (PM_{10}) standard (p. 3-7). Construction-related emissions of nitrogen oxides (NO_x), a precursor for ozone, and PM_{10} could contribute to adverse cumulative air quality impacts. Mitigation measures will likely be necessary to reduce these construction emissions.

F-1-3

Under all alternatives, dust and other sources of air pollution could result from improvements to existing facilities (p. 2-10), reconfiguring the entrance roadway (p. 2-11), and other maintenance projects. Alternatives 2 and 3 additionally allow new trails and campsites in various locations throughout the Plan Area, and a potential new water park (p. 2-27). Alternative 3 allows for the greatest increases in trails and camping throughout the Plan Area, in addition to miniature golf, game arcades, and athletic fields in the County Park (p. 2-28). Alternative 3 also allows for the potential development of a resort in Live Oak Camp (p. 2-21).

With regard to air quality from construction and maintenance activities, text on p. 4-11 states, "If major impacts to air quality were to be identified, the proposed project would be modified or mitigation measures would be implemented to reduce these impacts to no impact level. For example, exposed soils could be watered to prevent dust".

1

Recommendations:
Expand guidance on mitigation measures for construction and maintenance impacts to air quality. In addition to meeting all applicable local, state, and federal requirements, we recommend the Final EIS include an appendix listing mitigation measures to consider when designing specific construction projects. Possible measures to include are:

Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Minimize use, trips, and unnecessary idling of heavy equipment.
- Use the most recent pollution control equipment for all off-road equipment.
- Utilize cleanest available fuel engines in construction equipment and identify opportunities for electrification. Use ultra low sulfur fuel (diesel with 15 parts per million or less) in engines where alternative fuels such as biodiesel and natural gas are not possible.

F-1-4

- Distribute material hauling and disposal to minimize haulage miles.
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels and, if engines have been modified, to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.
- Prohibit any tampering with engines and require continuing adherence to manufacturer's recommendations.
- If practicable, lease new, clean equipment meeting the most stringent of applicable Federal or State Standards. In general, only Tier 2 or newer engines should be employed in the construction phase.
- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site.
- Use electrical power for all stationary equipment.

Administrative controls:

- Identify all commitments to reduce construction emissions.
- Identify where implementation of mitigation measures is rejected based on economic infeasibility.

F-1-4, Cont.

- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. Suitability of control devices is based on (1) whether there may be significant damage caused to the construction equipment engine, and (2) or whether there may be a significant risk to nearby workers or the public.
- Develop a construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow.
- Identify sensitive receptors in the project area, such as children, elderly, and infirm, and specify the means by which you will minimize impacts to these populations. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.
- Schedule and sequence work so there is not a significant overlap with other activities that contribute to air quality emissions.

Water Quality

Provide current information on water quality related to gasoline components. According to text on p. 2-26, under Alternatives 1 and 2, the number of motorized boats allowed on the lake at one time would range from 40 to 120. Under Alternative 3, the maximum allowable pool would increase to 160.

Text on p. 3-6 states that, to date, the only sampling of raw water at Cachuma Lake conducted for methyl tertiary butyl ether (MTEB) and other gasoline components occurred 1997. All detections were below Maximum Contamination Levels (MCL), and the sampling was limited to 1 season and 90 samples.

F-1-5

Text on p. 4-2 reads, "Motorized vehicle emissions would have minor impacts on water quality in the Plan Area under all three alternatives. Impacts are considered minor because the only testing to date has not shown exceedance of MCL standards".

Understanding cumulative impacts on water quality from increased motorized boating requires knowledge of current levels of MTEB, as well as benzene, toluene, ethylbenzene, and xylene (collectively, BTEX), and other gasoline components. The 1997 data may not reflect current conditions.

Alternatives 2 and 3 include creation of a Boating Management Plan (BMP) and a 5-year phase-out of non-conformant two-stroke engines (p. 2-26). Even with a BMP, EPA is concerned with potential cumulative impacts to water quality from fuel discharges. On p. 4-8, cumulative impacts listed for water quality do not discuss increased boating.

Recommendation:

- Collect and analyze additional data to provide a sound basis for predicting the cumulative impacts that increased motorized boating may have on water quality.

3

F-1-5, Cont.

- Consider reducing the timeframe for phasing-out non-conformant two-stroke engines.

Provide details on planned water quality monitoring of boat related pollutants. The Bureau of Reclamation (Reclamation) commits, on p. 4-7, to monitor for adverse water quality impacts through the existing water quality testing program. The text states that the existing monitoring program would, "be used to verify that BTEX compounds remain below MCL standards as reported in 1997". For the phase-out of non-conformant two-stroke engines, text states, "If pollutants exceed state limits, an accelerated phase-out would be implemented for Alternatives 2 and 3".

F-1-6

Recommendation:

- Provide details on how BTEX monitoring will be incorporated into the existing program and who will be responsible for the monitoring.
- Identify and commit to take steps to reduce pollution levels before MCLs are reached.

Cumulative Effects of Climate Change

Discuss climate change and its effects on the Plan Area, RMP/EIS, and proposed actions. A number of studies specific to California have indicated the potential for significant environmental impacts as a result of changing temperatures and precipitation.[1] The discussion of cumulative effects in the Draft EIS does not appear to address the effects of climate change on the Project Area. The Draft EIS also does not appears to address effects of climate change on the implementation of the proposed RMP/EIS.

The Government Accountability Office recently released a report entitled, "Climate Change: Agencies Should Develop Guidance for Addressing the Effects on Federal Land and Water Resources" (August 2007). According to the GAO report, federal land and water resources are vulnerable to a wide range of effects from climate change, some of which are already occurring.

F-1-7

Based on the freshwater ecosystem case study in the GAO report, possible effects to the proposed projects could include average temperature increases in Spring with earlier initial and maximum snow melt and higher water levels; vulnerability to fire due to evaporative stress (drying) from more hot days; changing precipitation patterns with more rain and less snow in winter causing winter streamflows to increase; decreased snowpacks and altered timing of spring runoff; larger and more severe storms and lightning causing more forest fires and drier conditions, feeding larger, more intense wildland fires; warming temperatures and more severe drought with increased risk of insects and diseases to trees; possible increases in invasive species, and warmer stream temperatures negatively affecting aquatic organisms and fish species that thrive in cold water.

[1] For example: Our Changing Climate: Assessing the Risks to California, A Summary Report from the California Climate Change Center, July 2006; Climate Change and California Water Resources, Brandt, Alf W.; committee on Water, Parks & Wildlife, California State Assembly, March 2007.

F-1-7, Cont.

Recommendation:

- The Final EIS should include a discussion of climate change and its potential effects on the proposed action and the action's impacts.
- This discussion should include a short summary of any applicable climate change studies, including their findings on potential environmental and water supply effects and their recommendations for addressing these effects.

Wildfire Control

F-1-8

Evaluate wildfire impacts from discontinuing grazing on the north shore. Under Alternative 3, grazing leases would be discontinued on the north shore. Under Alternatives 1 and 2, grazing on the north shore is a method to supplement fire management.

Recommendation:

- Evaluate the impacts discontinuing grazing on the north shore could have on the likelihood and severity of wildfires.
- If increased wildfire risks are found to be associated with discontinued grazing, provide detailed mitigation measures to maintain or improve upon current wildfire risk levels.

Wildlife Impacts

F-1-9

Commit to protecting bird populations. Text on p. 4-32 states, "High levels of disturbance within ½-mile radius of a nest site or a decline in prey base could cause the bald eagle to abandon nesting areas and would be a major adverse impact".

Under Alternative 3, a radio-controlled (RC) airplane landing strip could be constructed and placed away from existing and prime eagle nesting habitat. Text on p. 4-34 also states, "RC airplanes should be limited to use only during the nonbreeding season…"

Recommendation:

- Commit to keeping all facilities and trails over ½-mile away from existing and prime eagle nesting locations.
- Place signs and provide information to inform visitors of the need to stay away from nesting areas.
- Commit to only allowing RC airplanes during nonbreeding season and provide measures for enforcement.
- Provide analysis detailing the impacts RC planes are likely to have on bird populations.

Naturally Occurring Asbestos

Provide information on the presence of naturally occurring asbestos (NOA) on trails and roads and the potential effects on recreation. Asbestos-bearing ultramafic rocks are found in at least 44 of California's 58 counties. Disturbance of rocks and soils that contain NOA can result in the release of asbestos fibers to the air and exposure to the public. Asbestos is a known human carcinogen and represents a potential human health risk for those exposed while using roads or trails where it occurs. For information on the occurrence of NOA and health impacts, see EPA's NOA webpage at http://www.epa.gov/asbestos/pubs/clean.html. The Draft EIS does not indicate whether NOA has been identified in the Plan Area. Nor does it evaluate potential risks to current and future visitors who may be exposed to NOA on existing and proposed trails and roads through recreational activities.

Recommendations:

F-1-10

- Determine whether or not NOA is present on trails or roads within the Plan Area. Assess the potential for exposure to elevated levels of NOA from common activities such as hiking, mountain biking, camping, and patrols and road maintenance activities. Provide information in the Final EIS.
- If NOA is found to be present, review the California Air Resources Board (CARB) regulations and guidance at http://www.arb.ca.gov/toxics/asbestos/asbestos.htm, which address California's Asbestos Airborne Toxic Control Measures for Surfacing Applications that apply to unpaved roads. Additional road surfacing recommendations are available in the Department of Toxic Substances Control report "Study of Airborne Asbestos From A Serpentine Road in Garden Valley, California" (April 2005) at: http://www.dtsc.ca.gov/loader.cfm?url=/commonspot/security/getfile.cfm&pageid=33546.
- Evaluate existing trails and roads for sediment production and drainage in areas where NOA is likely to be present.
- If appropriate, post signs informing visitors that NOA is present, what the risks are, and how visitors can avoid exposure. EPA will be happy to assist your office in developing signage for these areas.
- If appropriate, these measures should be incorporated into the Preferred Alternative in the Final EIS and committed to in the Record of Decision (ROD).

Use of Herbicides

F-1-11

Identify herbicides used and any associated human health or environmental impacts. Text on p. 4-57 states that herbicides will continue to be used on invasive Italian thistle under all alternatives.

F-1-11, Cont.

Recommendations:

- Specify herbicides that will be used in the Plan Area.
- Provide information on human health impacts associated with exposure to the specific herbicides that will be used.
- Provide information on environmental impacts associated with specific herbicides that will be used, including impacts to non-target organisms, ground water, surface water, and soils.
- Commit to specific best practices for herbicide use to protect human health and the environment.
- Consider and provide information regarding alternatives to herbicides for controlling Italian thistle.

Mass Transportation

F-1-12

Consider mass transportation. A public comment listed on p. 2-22 recommended use of electric shuttles at the lake and to access the lake in order to reduce traffic and associated emissions.

Recommendation:

- Consider mass transportation in the Final EIS. Electric or hybrid shuttles could be a valuable service for park visitors and reduce air pollution. At a minimum, include information on why mass transportation is not feasible.

Scope of Potential Water Park and Resort Facilities

F-1-13

Provide more details on the possible size, energy usage, and features of the potential water park and resort facilities. Alternatives 2 and 3 include the possible development of a water park facility (p. 2-27). Alternative 3 allows also allows for the potential development of a resort facility (p. 2-21). The scope of these facilities is unclear.

Recommendation:

- Clarify the scope of the potential water park facility and provide more details on the potential resort facility. At a minimum, provide a tentative range for the size and energy usage of each.
- Commit to green building practices, including designing for energy efficiency and incorporating recycled materials into building design. Consider practices recommended by the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) program.

Procedural Comments

F-1-14

Explain the context for the timing of the Draft RMP. It unclear if this is the first RMP for Cachuma Lake or if this document will replace an existing RMP. Further, it is unclear why the Draft RMP is being produced at this time. Text on p. 2-5 states that public scoping meetings for this RMP began in March of 2002.

F-1-14 Cont.

Recommendation:

- Over six years have elapsed since initiation of work on this Draft RMP. We believe it would be useful for the public and decision-makers to understand the context for this period of time. We recommend the Final EIS include a short description of the reasons for the timing of the Draft RMP.

Commit to Monitoring and Enforcement. The Draft EIS includes some procedures for monitoring and enforcement to help ensure that the RMP is followed. For example, private boats are currently, and will continue to be, subject to inspection, treatment, and quarantine requirements to avoid the introduction of invasive species (p. 3-64).

F-1-15

Recommendation:

- In the Final EIS, commit to allocating funding and providing detailed plans for on-going, project-specific monitoring of visitor use and environmental impacts.
- Commit to allocating funding and providing detailed plans to enforce park visitor rules defined in the RMP.

8

Responses to Comment F-1

F-1-1
This introductory comment is a summary of issues discussed in subsequent comments. The following responses address these issues in greater detail.

F-1-2
A description of the General Conformity framework has been added as Section 3.2.3.1 of the Final EIS, and Section 4.2.3 has been revised to include a discussion of future emissions from implementation of the RMP. Future-year emissions are projected to be below GCR de minimis thresholds and would not conflict with the goals in the Santa Barbara County 2007 Clean Air Plan.

F-1-3, 4
The EIS is a program-level document, and insufficient information is available about individual projects to quantify construction emissions. When each project is funded and planned, the construction emissions will be estimated and mitigation measures will be implemented to minimize dust and exhaust emissions.

Construction of any individual project implemented under the RMP will comply with all the Santa Barbara Air Pollution Control District (SBAPCD) rules and regulations for mitigating short-term and construction emissions. Specific SBAPCD-recommended mitigation measures for construction and maintenance activities have been added to Mitigation AQ-1 in Final EIS Section 4.2.7. The measures would account for the Plan Area's nonattainment of state ozone and PM10 standards by reducing fugitive dust emissions for earthmoving activities and reducing NO_x and $PM_{2.5}$ emissions from construction equipment.

F-1-5
Detailed monthly water quality data for Cachuma Lake were obtained from the City of Santa Barbara Public Works Department for January 1995 to January 2009 (see Appendix A, Part A-1). The testing parameters included hardness, nitrates, pH, total organic carbon, turbidity, and trace metals. In 2003, volatile organic compounds including MTBE (but not BTEX compounds) were added to the analytical parameters, but no detections have been recorded. Annual testing for BTEX compounds from Cachuma Lake waters is conducted at the William B. Cater Treatment Plant (see Appendix A, Part A-2). As of 2009, no BTEX compounds have been detected.

The Preferred Alternative (Alternative 2) assumes a small increase in boat use (approximately 20 percent, based on population projections for 2030). No other boat use would contribute to potential cumulative impacts on lake water quality. Under the Preferred Alternative, the timeframe for phasing out nonconformant engines has been lowered from 5 years to 2 years. In addition, Mitigation Measure WQ-1 has been revised to state that if water quality monitoring identifies any pollutants in excess of state limits, the phase-out of nonconformant engines would be implemented within 6 months from detection. Given the small increase in boat activity, and the shorter phaseout period for nonconformant boat engines, no cumulative impacts are expected.

F-1-6
Sections 4.1.5 and 4.1.7 of the Final EIS have been modified to clarify monitoring of boat engine-related pollutants. The Preferred Alternative includes a 2-year phaseout of nonconformant engines. If annual testing of raw water at the William B. Cater Treatment Plant detects BTEX compounds, the phaseout would take place within 6 months of detection. As of 2009, no BTEX compounds have been detected.

F-1-7
The Final EIS has been revised to discuss climate change and greenhouse gas emissions, potential Plan-related effects, and proposed mitigation in Sections 3.2.3.2, 4.1.3, 4.2.3, and 4.2.7.

F-1-8
Alternative 2, the Preferred Alternative, would allow grazing to continue on the North Shore. Grazing would continue to supplement vegetation and fire management. Because grazing will continue, wildfire risks are not expected to increase.

A Vegetation Management Plan will be developed to address issues of noxious weeds, native plant restoration, and fire management.

F-1-9
The documented bald eagle nest site described in the RMP is approximately 1.35 miles northeast of the boundary of the Plan Area. Studies show that pedestrian activity may disturb nesting bald eagles if the activity occurs within a 0.6-mile radius of a nest site (Watson and Rodrick 2000). The distance between the nest site and the Plan Area is more than twice that distance. Therefore, recreational activities in the Plan Area would not affect bald eagle nesting, and RMP-related actions would not expose the nest site to disturbance. Discussions of the bald eagle nest in the Final EIS have been revised to clarify this point (see in particular Mitigation BI-1 in Section 4.4.7).

Alternative 3 would have allowed for a possible public RC airplane site east of Mohawk. Alternative 2 is the Preferred Alternative; therefore, no RC impacts would occur.

F-1-10
According to California Geological Survey mapping, there is no naturally occurring asbestos or ultramafic rock in the vicinity of Cachuma Lake (California Geological Survey 2000). The Final EIS has been revised to include this information in new Section 3.6.2.2.

F-1-11
Section 4.4.3.2 has been modified to specify the herbicides used in the Plan Area, identify human health impacts and environmental impacts associated with those herbicides, commit to specific best practices for herbicide use, and provide alternatives to herbicide use.

F-1-12
Mass transit for access to the Plan Area would not be feasible for the majority of visitors that tow boats, personal watercraft, or camping equipment, which cannot be accommodated on a bus or shuttle.

F-1-13
The water park that could be developed under Alternatives 2 and 3 has not been designed; therefore, it is not possible to identify the park's potential size, energy use, or features. Facilities and improvements proposed in the RMP would only be implemented if demand warranted and if funding was available. The precise number, layout, and timing of the new facilities would be determined by the local managing partner through a separate planning, design, and permitting process.

Green building practices will be considered on a project-by-project basis.

Note that only Alternative 3 would allow for resort-like accommodations as an upgrade to the permanent cabin camping provided in Alternative 2. As Alternative 3 has not been identified as the Preferred Alternative, no resort development would take place.

F-1-14
This is the first RMP developed for Cachuma Lake under the authorities outlined in Section 1.2.

The Final RMP/EIS has been updated to include additional data pertinent to the evaluation for biological resources, water quality, air quality, greenhouse gases and climate change, and other resources. The additional data do not change the conclusions of the EIS and have been used to address the No Action and action alternatives.

The RMP reflects conditions related to the surcharge requirements described in Section 1.1. Section 1.3 states that the RMP will have a planning horizon of 20 years. The text of Section 1.3 has been revised to state that the planning horizon will begin when a Record of Decision is issued.

F-1-15
The RMP provides details for monitoring and enforcing proposed actions where possible. The RMP is a program-level document that identifies suitable types of activities and development for different parts of the Plan Area but does not obligate the local managing partner to implement those activities and developments. As stated in Section 2.4.2.1, new or modified recreational uses would be considered based on (1) sufficient public demand, (2) sufficient staffing and funding to manage the new or modified uses in accordance with the RMP, and (3) potential for increased public benefits and use. Such actions would also require a tiered level of environmental review that would reference this programmatic document. In addition, Section 2.4.2.1 of the Final RMP/EIS has been revised to state that the local managing partner has the option of continuing existing uses based on the three factors listed above.

Note also that mitigation would be included in any future project if needed, and the funding would cover both project and mitigation costs. The responsibility for funding, designing, and implementing (or constructing) the management actions and improvement projects will be specified in an agreement with the local managing partner. The source of funding will depend on many factors that will vary over the planning period, such as use fees, availability of grants, etc.

B.3 COMMENTS FROM STATE AGENCIES

S-1 Kurt Souza, California Department of Public Health,

State of California—Health and Human Services Agency
California Department of Public Health

CDPH

MARK B HORTON, MD, MSPH
Director

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CACHUMA PROJECT

ARNOLD SCHWARZENEGGER
Governor

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September 4, 2008

Mr. Robert Epperson
Bureau of Reclamation
1243 N Street
Fresno, CA 93721

Dear Mr. Epperson:

Cachuma Lake, Draft Resources Management Plan/Environmental Impact Statement

This letter is in response to the posting of the Cachuma Lake, Draft Resources Management Plan/Environmental Impact Statement dated June 2008. The California Department of Public Health, Drinking Water Program (CDPH) is the regulatory agency that oversees drinking water quality that is served by public water systems, such as the City of Santa Barbara and Goleta Water District. The Lake Cachuma water source is used by both agencies as a drinking water supply to their south coast consumers.

The Draft EIS contains Alternative 3, expanded recreation which will include a swimming area in Lake Cachuma. The CDPH has reviewed California Health and Safety Code Sections 115825, 115830, 115835, 115840, 115840.5, 115841, 115842, 115843.3, 115845 and 115850, and the California Water Code Section 12944(a).

S-1-1

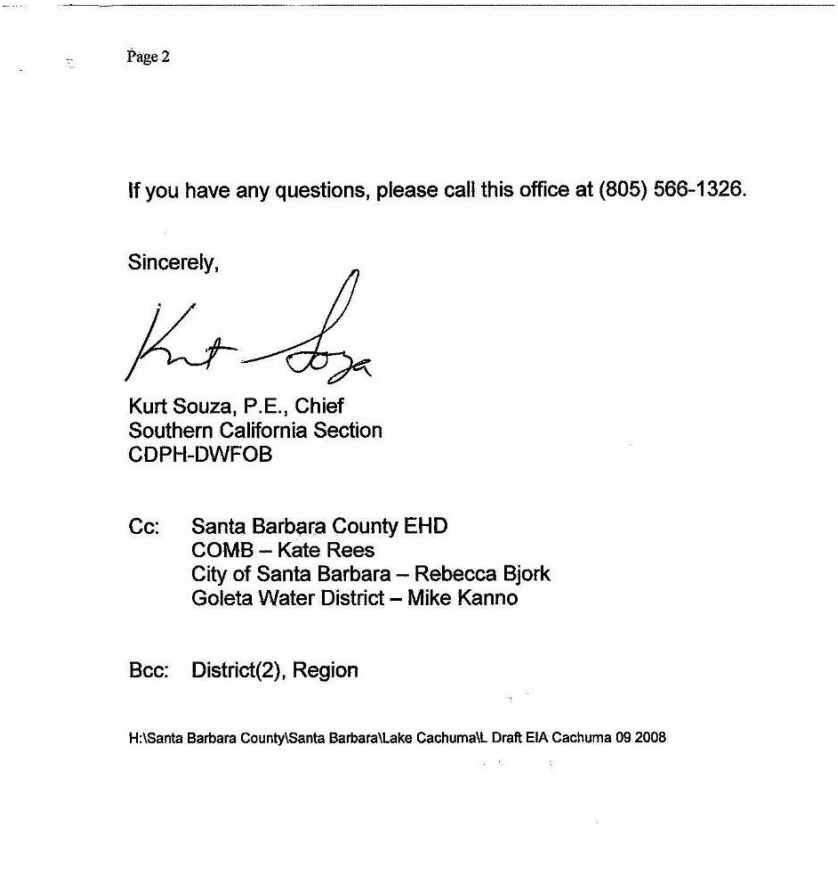
The California Health and Safety Code prohibits body contact recreation in a reservoir where water is stored for domestic use, but makes exceptions for all reservoirs in San Diego County, the Nacimiento Reservoir in San Luis Obispo County, the Modesto Reservoir in Stanislaus County, the Sly Park Reservoir in El Dorado County, and the Bear Creek Reservoir in San Bernardino County. The California Water Code makes an additional exception for reservoirs constructed and operated as part of the State Water Project by providing that body contact recreation shall be permitted on all such reservoirs to the extent that it is compatible with public health and safety requirements.

Lake Cachuma is a raw surface water source for the south coast for which the statues do not provide an exception from the restriction of body contact recreation. Please include this information when completing the final EIS/EIR.

Classification ENV-6.00
Project CAC-01
Control No. 080631758
Folder I.D. 105631?

CACHUMA PROJECT

Southern California Drinking Water Field Operations Branch
1180 Eugenia Place, Suite 200 Carpinteria, CA 93013-2000
(805) 566-1326: (805 745-8196 fax



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If you have any questions, please call this office at (805) 566-1326.

Sincerely,

Kurt Souza, P.E., Chief
Southern California Section
CDPH-DWFOB

Cc: Santa Barbara County EHD
COMB – Kate Rees
City of Santa Barbara – Rebecca Bjork
Goleta Water District – Mike Kanno

Bcc: District(2), Region

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Responses to Comment S-1

S-1-1
As Alternative 2 has been selected as the Preferred Alternative, no body contact recreation would be introduced.