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**2. The Environmental Effects of Stocking on Downstream Fish,  
Including the Endangered Steelhead, Must Be Studied**

The EIS indicates that, in scoping, members of the public identified as a significant issues the “[n]eed to protect federally and state-protected species and habitat...” (EIS, 2-24) and protection of native fish from fish planting (2002 Scoping Report, B-2). The EIS generally recognizes that the steelhead have been listed as endangered (EIS, 1-2), and mentions that the “Santa Ynez River below Bradbury Dam is closed to trout fishing due to the presence of the endangered southern steelhead” (EIS, 3-28). The EIS acknowledges that Fish Releases are necessary for steelhead. (EIS, 1-2.) The EIS indicates that bass in the Lake prey on other fish (EIS, 4-27) and, as noted above, there was general agreement in scoping that impacts outside the RMP Plan Area needed to be evaluated. The EIS indicates that Reclamation intends to increase, or at least maintain, the population of stocked sport-fish in Lake Cachuma. (EIS, 4-27.) However, contrary to NEPA, the EIS fails to evaluate the impacts of the RMP alternatives (e.g., continuation of stocking under current, enhanced and expanded recreation alternatives), on the downstream steelhead by interbreeding and predation. Rather, as demonstrated above, the EIS limits its analysis of biological impacts to the “Plan Area.” (EIS, 4-19.)

**R-2-17**

The issue of interaction of stocked fish, including bass and rainbow trout, with native fish populations below Bradbury Dam, including the endangered steelhead, is an important issue. It is well documented that fish escape from the Lake (most likely through the spillway) and travel downstream and reside in the Santa Ynez River where there is endangered steelhead, and that predation and interbreeding may occur.<sup>12</sup> Indeed, Reclamation’s FEIR/EIS FMP/BO indicates that steelhead downstream of Bradbury Dam are vulnerable to predatory fish (FEIR/EIS FMP/BO, 2-24), and bass are known to reside in downstream pools. The impacts of stocked fish on the steelhead, and other fishery resources downstream of Bradbury Dam, should be evaluated.

To adequately do so, the EIS should include the historical and current plantings of rainbow trout and bass in the Lake. The baseline environmental conditions and the impacts of these fish plantings are completely omitted in the EIS, not to mention any possible mitigation. The latest and best information available regarding the baseline conditions and impacts of trout planting on the genetic integrity of the endangered southern steelhead should be addressed. Likewise, the latest and best information available regarding the baseline conditions and impacts of bass planting on predation of the endangered southern steelhead should be addressed. Pertinent studies and policies of the CDFG, NMFS, and the FMP should be disclosed in relation to fish plantings under the RMP alternatives. The potential mitigation of these impacts could be significant on the recreational opportunities. It is not also clear why a fisheries management plan should be prepared by CDFG for Alternatives 2 and 3 but not under Alternative 1 (Table 2-3); clearly, this CDFG plan would be needed in all alternatives and the timeline and process for the Lake Cachuma fisheries management plan and its relationship to the RMP should be discussed in much more detail. The issue of transporting steelhead above Lake Cachuma also needs much

<sup>12</sup> Scientific literature and studies regarding predation and interbreeding are detailed in ID#1’s comment letter. To avoid unnecessary redundancy, we will not discuss them here.

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**R-2-17,  
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more discussion in the context of NMFS recovery plan process, the State Board hearings, and the FMP. The baseline environmental conditions and the impacts of fish passage upstream of Lake Cachuma are completely omitted in the EIS, not to mention any possible mitigation.

**3. The Downstream Environmental Effects of Other Lake Recreational Activities, Including From 2-Cycle Engine Recreational Boats, Body Contact and Equestrian/Cattle Activities, Should Be Evaluated**

The RMP alternatives involve continuation of 2-cycle engine recreational boats (at least for 5 years), potential swimming and other body contact, and increased equestrian/cattle activities in or near the Lake. As described in ID#1's comment letter, incorporated herein by reference, each and all of these activities degrade water quality and the EIS does not evaluate the environmental impacts of such activities.

**R-2-18**

While SYRWCD does not directly supply drinking water to customers, like ID#1 and the other Member Units, Lake water flowing downstream of the Bradbury Dam supports endangered steelhead, replenishes subsurface flows and groundwater basins and is diverted and pumped for a variety of beneficial consumptive uses in the Santa Ynez and Lompoc Valleys. Water pollution associated with 2-cycle engines was identified at the outset during scoping. (*E.g.*, EIS, 2-23.) Yet, the EIS does not present any current baseline BTEX pollutant data for the Lake. The only information is a single survey conducted over 11 years ago by COMB. Without an understanding of the current (baseline) pollutant concentration levels, there is no basis to evaluate whether the recreational activities proposed by the RMP alternatives will have significant adverse impacts. Moreover, in light of the fact that 2-cycle engines have been banned in several lakes, and none of the RMP alternatives propose an immediate ban (only either no ban or a ban after 5 years), it may be that the Cachuma Lake has or will become a magnet for older 2-cycle engines that users may not desire to upgrade or replace (particularly in difficult economic times.) However, there is no analysis of this potential impact as a direct, indirect or cumulative impact.

For the reasons set forth in ID#1's comments letter and here, the EIS should (but fails to) evaluate the impacts of such activities downstream of Bradbury Dam including on the endangered steelhead population and surface and ground water quality, as well as discuss appropriate mitigation measures.

**4. The EIS Should Discuss Cumulative Impacts of the Proposed Action When Added to Past, Present and Reasonably Foreseeable Future Actions Including the Steelhead Population, the FMP/BO and the Fish Recovery Efforts**

**R-2-19**

A cumulative impact is defined in NEPA's implementing regulations as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions.... Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." (40

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CFR 1508.7.) In considering cumulative impact, an agency must provide “some quantified or detailed information; ... [g]eneral statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided.” (*Neighbors of Cuddy Mountain v. U.S. Forest Service*, 137 F.3d 1372, 1379-1380 (9<sup>th</sup> Cir. 1998) (internal quotation marks omitted).) A cumulative analysis “must be more than perfunctory; it must provide ‘a useful analysis of the cumulative impacts of past, present, and future projects.’” (*Kern v. U.S. Bureau of Land Management*, 284 F.3d at 1062, 1075 (9<sup>th</sup> Cir. 2002) (quoting *Muckleshoot Indian Tribe v. United States Forest Serv.*, 177 F.3d 800, 810 (9<sup>th</sup> Cir. 1999)).” (*Ocean Advocates v. U.S. Army Corps of Engineers*, 402 F.3d 846, 868 (9<sup>th</sup> Cir. 2005).)

Under Ninth Circuit precedent, the cumulative impact analysis requires two critical features: First, it must not only describe related projects but also enumerate the environmental effects of those projects. Second, it must consider the interaction of multiple activities and cannot focus exclusively on the environmental impacts of an individual project. (*Oregon Natural Resources Council Fund v. Brong*, 492 F.3d 1120, 1133 (9<sup>th</sup> Cir. 2007).) The EIS must offer quantified or detailed data about the effects. (See *Klamath-Siskiyou Wildlands Center v. BLM*, 387 F.3d 989, 995 (9<sup>th</sup> Cir. 2004) (problem with cumulative effects tables is that they do not provide objective quantification of the impacts).) To this end, the EIS must supply adequate data of time, place, and scale and detail how different project plans and methods affect the environment. (See *Brong*, *supra*, 492 F.3d at 1133.)

As explained above, the EIS only generally mentions past, present and reasonably foreseeable future actions downstream of Bradbury Dam, and does not evaluate the impacts of the recreational activities at the Lake (as described in the RMP alternatives) downstream of Bradbury Dam even though Lake water readily spills and is released downstream. Past, present and reasonably foreseeable future actions include Water Rights Releases, Fish Releases, Reclamation’s FMP/BO project (including 3-feet of surcharge of the Lake), and steelhead recovery plan efforts involving the Lake and Bradbury Dam. In addition, the EIS does not evaluate the impacts of another reasonably foreseeable future action, invasion of the Lake by Quagga and/or Zebra mussels.

There is an undeniable close geographic connection and interaction between such actions and recreational activities at the Lake to be provided for by the RMP, and a cumulative impact analysis should be done and appropriate mitigation should be considered to inform Reclamation and the public whether recreational activities posited by the RMP alternatives will cause adverse environmental impacts when considered in combination with other related actions. Even if recreational activities proposed by the RMP alternatives only produce minor direct and indirect impacts, when viewed in isolation, they may produce significant adverse impacts when other related actions are considered in the impact analysis.

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**F. The EIS Does Not Include Appropriate Mitigation Measures and Is Based on Misleading Economic Assumptions**

NEPA requires that an EIS include appropriate means to mitigate adverse environmental impacts (if not already included in the proposed action or alternatives.) (40 CFR 1502.14(f); 1502.16(h).) The mitigation measures discussed in an EIS must cover the range of impacts of the proposal. The measures must include such things as design alternatives that would decrease pollution emissions. Construction impacts, esthetic intrusion, as well as relocation assistance, possible land use controls that could be enacted, and other possible efforts. Mitigation measures must be considered even for impacts that by themselves would not be considered "significant." Once the proposal itself is considered as a whole to have significant effects, all of its specific effects on the environment (whether or not "significant") must be considered, and mitigation measures must be developed where it is feasible to do so. (Question 18, *Forty Most Asked Questions Concerning CEQ's NEPA Regulations* (March 23, 1981), citing 40 CFR 1502.1502.14(f) 1502.16(h), and 1508.14.)

**R-2-20**

The EIS's discussion of mitigation measures is deficient for several reasons. First, as provided above, the EIS fails to evaluate impacts, including water supply facilities at Bradbury Dam and the environment downstream of the Dam, consequently there is no adequate discussion of mitigation on those resources or the RMP alternatives as a whole. Second, the mitigation that is described does not adequately address measures to guard against or remedy potential clogging of water supply facilities necessary for Water Rights Releases and Fish Releases, and SWP deliveries to the South Coast, including the outlet works at the base of Bradbury Dam and the Hilton Creek Watering System.

With regard to Quagga and Zebra mussels, the EIS concludes that "[n]o additional mitigation is required" other than following the protocols of Santa Barbara County listed in Section 3.9.2.2. of the EIS. (EIS, 4-37.) However those protocols (which appear to be from a press release), only involve inspection, quarantine and pressure washing of non-resident boats. They do not address other means of mussel transport into the Lake, including kayaks and other known means of transport. Moreover, the EIS fails to discuss measures that could be implemented to unclog the Hilton Creek Watering System or outlet works in the event the Lake does become infested with the mussels. Rather, if that were to occur, the EIS says only that "additional protective measures would be suggested in a Boating Management Plan or in a separate report prepared by the local managing partner." (EIS, 4-37, Mitigation BI-7 (emphasis added).) This perfunctory description of mitigation is inconsistent with the "hard look" required by NEPA. "Mitigation must 'be discussed in sufficient detail to ensure that environmental consequences have been fairly evaluated.'" (*Carmel-By-the-Sea v. U.S. Dep't of Transp.*, 123 F.3d 1142, 1154 (9th Cir. 1997) (quoting *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 353, 109 S.Ct. 1835, 1847-48, 104 L.Ed.2d 351 (1989)). "A mere listing of mitigation measures is insufficient to qualify as the reasoned discussion required by NEPA." (*Northwest Indian Cemetery Protective Ass'n. v. Peterson*, 795 F.2d 688, 697 (9th Cir. 1986), *rev'd on other grounds*, 485 U.S. 439, 108 S.Ct. 1319, 99 L.Ed.2d 534 (1988).)



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In light of the catastrophic damages Quagga and Zebra can cause to SYRWCD's constituents (see above), "protective" "suggestions" are not enough. What the EIS needs to discuss as mitigation is this: What can and will Reclamation, its managing partner and/or others do to ensure that the mussels do not clog the outlet works and other Lake facilities that must remain operable to provide for downstream Water Rights and Fish Releases, as provided in State Board decisions and orders, the FMP/BO and the Settlement Agreement, and to provide for SWP deliveries to the South Coast? What can and will be done by Reclamation, its managing partner and/or others to eradicate the mussels? Can and will Reclamation, its managing partner and/or others bear the cost of Quagga and Zebra mussel damage? While we do not pretend to know the answers to all these questions, Reclamation and the public need be informed about these fundamental matters. The EIS states that the "mussels can multiply quickly and clog waterways and pipelines, affect lake ecosystems, and create costly maintenance issues. The mussels have been found in several lakes in Southern California, and no safe remedy is currently available for eliminating them from a water body once it is infested." (EIS, 2-12 (emphasis added).) Even on October 31, it is hard to imagine something more frightening. Given that Lake revenues have (in most years) been less than the expenses necessary to run it, the backlog of deferred maintenance and that Reclamation's managing partner has only "limited funding" and has apparently failed to establish a reserve fund (EIS 2-4, 3-57), where will the funding to deal with a Quagga or Zebra mussel invasion come from? That needs to be known and disclosed in the EIS. In light of the enormous damages the mussels have wrought so far, and the critical importance and supremacy of Cachuma water supply facilities for releasing River water downstream of the Dam and delivering SWP water to the South Coast and the potential of mussels to clog such facilities and ruin ecosystems for native species such as the endangered steelhead, we think that partial or total closure of the Lake to boats and other vessels that harbor mussels ought to be discussed as mitigation, as well as measures the could and would be implemented immediately to unclog such critical water supply facilities.

Third, the mitigation that is described, as well as the EIS itself, appears to be based on misleading economic assumptions. As mentioned above, an EIS serves two functions. First, it ensures that agencies take a hard look at the environmental effects of proposed projects. Second, it ensures that relevant information regarding proposed projects is available to members of the public so that they may play a role in the decision-making process. (*Robertson, supra*, 490 U.S. at 349, 109 S.Ct. at 1845.) For an EIS to serve these functions, it is essential that the EIS not be based on misleading economic assumptions. (*Hughes River Watershed Conservancy, supra*, 81 F.3d 446.) Misleading economic assumptions can defeat the first function of an EIS by impairing the agency's consideration of the adverse environmental effects of a proposed project. (*See South La. Env'tl. Council, Inc. v. Sand*, 629 F.2d 1005, 1011-12 (5th Cir.1980).) NEPA requires agencies to balance a project's economic benefits against its adverse environmental effects. (*Calvert Cliffs' Coordinating Comm. v. United States Atomic Energy Comm'n*, 449 F.2d 1109, 1113 (D.C.Cir.1971).) The use of inflated economic benefits in this balancing process may result in approval of a project that otherwise would not have been approved because of its adverse environmental effects. Similarly, misleading economic assumptions can also defeat the second function of an EIS by skewing the public's evaluation of a project. (*Hughes, supra*, at 446.)

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As mentioned above, the EIS does not take a “hard look” at the adverse environmental impacts (including ecological or economic damages) that could be caused by a Quagga or Zebra mussel infestation or describe where the funding will come from that will surely be necessary to deal with the problem, which will only be exacerbated by the so-called “enhanced” and “expanded” recreation RMP alternatives 2 and 3. Rather, the EIS appears to *assume* there will be solution to the obvious fiscal problem at the Lake without any analysis. Such assumption and lack of analysis impairs both the first and second functions of an EIS. Moreover, the Reclamation’s RMP Guidebook requires that each RMP alternative be “realistic and implementable within anticipated funding and staffing levels.” (RMP Handbook, III-9.) This is yet a further reason that the EIS is inadequate. The EIS should explain how past funding difficulties will be solved, including the deferred maintenance, and how measures to mitigate the impacts of the RMP alternatives will be funded.

Finally, SYRWCD would like to make its position clear. The District is not opposed to Reclamation adopting an RMP for the Lake. However, as provided above, the RMP must be based on appropriate environmental evaluation under NEPA, including a balanced range of RMP alternatives, evaluation of impacts to vital water supply facilities at the Bradbury Dam (which must remain operable and capable of providing for Water Rights Releases and Fish Releases downstream and SWP water to the South Coast) and to the environment outside and downstream of the Plan Area, and discussion of appropriate mitigation measures. In addition, prior to approval of any new long-term contract with the County of Santa Barbara or other California public agency, as manager partner, the contract should be the subject of prior environmental review under CEQA in an EIR.

However, neither SYRWCD nor its constituents are in a position to assume responsibility for the costs of mitigating significant or major impacts caused by recreational and other activities at the Lake – nor should they. Reclamation needs to address and be prepared to provide for and fund adequate mitigation of any significant and major impacts caused by recreational and other activities authorized by the RMP including damages due to a Quagga and Zebra mussel infestation. Otherwise, if SYRWCD or its constituents have to bear the burden of such costs, Reclamation will, in effect, be subordinating the rights and interests of SYRWCD and its constituents in and to Water Rights Releases, as well as Fish Releases and the paramount water supply function of the Lake, to *incidental* recreational uses, which is inconsistent with Cachuma Project purposes and contrary to the FMP/BO and Reclamation’s Cachuma permits including Condition 11.

#### **IV. CONCLUSION**

**R-2-21**

As detailed above, SYRWCD requests that Reclamation consider additional RMP alternatives, conduct further study and evaluation of downstream and other environmental impacts, and further discuss appropriate mitigation measures, and take whatever further actions (which may include possible circulation of a revised draft EIS or supplemental EIS) necessary to develop an EIS that complies with NEPA and that can serve as the basis for informed decision-

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**Cont.**

making and public scrutiny, and approval of an appropriate RMP for future Cachuma Lake operations.

Thank you for considering our comments and suggestions. Should you have any questions or require clarification regarding any of our comments, please contact the undersigned.

Sincerely,

SANTA YNEZ RIVER WATER  
CONSERVATION DISTRICT

*Bruce A. Wales*

Bruce A. Wales  
General Manager

Enclosures

cc: (Email only and w/o enclosures)  
CCRB / COMB  
SYRWCD, ID #1  
City of Solvang  
City of Buellton  
City of Lompoc  
SYRWCD, Board of Directors  
Stetson Engineers  
Ernest A. Conant, District Counsel

### *Responses to Comment R-2*

#### **R-2-1–R-2-3**

These introductory comments are addressed in subsequent responses to specific comments in this letter. In particular, see the responses to Comments R-2-5, R-2-6, R-2-8, R-2-10, R-2-12, and R-2-17.

#### **R-2-4**

Reclamation recognizes the statement in footnote 2 of the comment that SYRWCD has incorporated ID#1's comments by reference. Please see the responses to Comments R-1-1 through R-1-26. The response to Comment R-1-26 discusses downstream uses.

The RMP states in Section 1.1: “All recreational uses and improvements at the lake must be consistent with the original purpose of the Cachuma Project. They must not interfere with reservoir operations, which are focused on providing a reliable annual yield of high-quality water primarily for agricultural and municipal use. Recreational uses and improvements must also not interfere with protection of endangered species, particularly Southern California steelhead.” The Preferred Alternative identified in the Final EIS is protective of water quality in Cachuma Lake.

**R-2-5**

The history of SYRWCD’s involvement in the Cachuma Project is noted. Final EIS Section 1.1 has been revised to include information about the authorization and objective of the Cachuma Project.

The Draft EIS proposes three alternatives that meet the purpose and need of the proposed action and are compatible with the objectives to operate Cachuma Lake for water delivery and water releases for steelhead protection. The range of impacts from the No Action Alternative (Alternative 1), Enhanced Recreation Alternative (Preferred Alternative), and Expanded Recreation Alternative (Alternative 3) is described in Section 4. Cumulative impacts, including those affecting areas downstream of Lake Cachuma, are also discussed where appropriate. In some cases, discussion of downstream cumulative impacts has been added as a result of public comments on the Draft EIS, but the additional information does not change the overall findings of the Draft EIS analysis.

See the response to Comment R-1-1 in regard to recreation.

The Final EIS has been revised to include new Section 2.9, which discusses the reasons that an alternative that would reduce recreational opportunities in the Plan Area was eliminated from detailed study.

**R-2-6**

See the responses to Comments R-1-1 and R-1-18 in regard to the issues of recreation opportunities and endangered steelhead, respectively.

Additional information about the history, purpose, and facilities associated with the Cachuma Project has been added to Section 1.1 of the Final EIS. This information is provided to clarify the relationship between operations and activities in the Plan Area and Reclamation’s water release requirements for fisheries protection and water rights downstream of Bradbury Dam. A separate environmental evaluation (Final Environmental Impact Report: Consideration of Modifications to the U.S. Bureau of Reclamation’s Water Right Permits 11308 and 11310 (Applications 11331 and 11332) to Protect Public Trust Values and Downstream Water Rights on the Santa Ynez River below Bradbury Dam (Cachuma Reservoir)) is under way to address the exact flow regime needed for Reclamation to satisfy the requirements of the Biological Opinion and downstream water rights in accordance with SWRCB orders. Therefore, the information added to the Final EIS is intended to provide context to Plan Area operations and activities rather than to serve as an exhaustive account of the Cachuma Project, SWRCB decisions on the project, and the various proceedings and settlements described in the comment.



See also the response to Comment R-2-5.

**R-2-7**

The proposed action is implementation of an RMP (EIS Section 1.3). The No Action Alternative (Alternative 1) would not implement an RMP and would continue the current course and status of management actions. Two action alternatives are proposed for implementing an RMP: Alternative 2 (the Preferred Alternative) and Alternative 3. The Preferred Alternative was selected after the issuance of the public draft and review of public comments. This is in accordance with 40 CFR 1502.14(e). All three alternatives are evaluated and analyzed in Section 4 of the EIS, including the proposed action as implemented by Alternative 2 or 3.

As described in Section 2.2, the development of the RMP alternatives followed the RMP planning process steps outlined in Reclamation's Resource Management Plan Guidebook. This analytical route is consistent with NEPA requirements. "The statutory and regulatory requirements that an agency must consider 'appropriate' and 'reasonable' alternatives does not dictate the minimum number of alternatives that an agency must consider" (Native Ecosystems Council v. U.S. Forest Service [No. 04- 35274, 35 ELR 20226, 9th Cir., November 7, 2005]).

**R-2-8**

The Draft EIS proposes three alternatives that meet the purpose and need of the proposed action and are compatible with the objective to operate Cachuma Lake for water delivery. The alternatives represent a reasonable range of actions and have a corresponding range of impacts that are fully analyzed in Section 4. The alternatives satisfy the Congressional mandate that "in investigating and planning any Federal ... water resource project, full consideration shall be given to the opportunities, if any, which the project affords for outdoor recreation and for fish and wildlife enhancement" (Federal Water Project Recreation Act, Public Law 89-72, 89th Congress, S.1229, July 9, 1965, 79 Stat. 213, 214; as amended by Public Law 93-251, March 7, 1974, 88 Stat. 33, Sec. 77; and Public Law 102-575, October 30, 1992, 106 Stat. 4690, Title XXVIII). Failure to consider opportunities for outdoor recreation would be inconsistent with Reclamation's Congressional mandate and would not satisfy the purpose and need of the proposed action. Moreover, Cachuma Lake has provided opportunities for outdoor recreation for over 50 years, and those opportunities still exist.

The comment states that the EIS should have evaluated alternatives involving reduced recreational activities and management actions that would result in protection and enhancement of downstream water supplies. First, Alternative 2, the Preferred Alternative, would not substantially expand recreation; further, implementation of any new activity or facility would only take place if demand warranted and if funding was available. Reclamation considers the Preferred Alternative protective of water quality and downstream water supply. This issue is discussed in more detail in regard to subsequent specific comments, such as the responses to Comments R-2-10 and R-2-16. Second, alternatives involving reduced recreational activities would not be consistent with the Congressional mandate set forth in the Federal Water Project Recreation Act. As stated previously, Section 2.9 discusses the reasons that an alternative that would reduce recreational opportunities in the Plan Area was eliminated from detailed study. The RMP has not contrived "a purpose so slender as to define competing 'reasonable alternatives' out

of consideration” (as the comment quotes from *Davis v. Mineta*) but rather defined a purpose and need and set of alternatives that are consistent with Reclamation’s authorizing legislation.

**R-2-9**

This introductory comment does not clarify how the scoping process for the RMP/EIS is at issue. Specific issues related to downstream water supply and endangered species protection are addressed in the responses to Comments R-2-10 and R-2-11, below, and in the response to Comments R-1-17 and R-1-18.

The EIS summarizes the development of the RMP alternatives in accordance with the RMP planning process steps outlined in the RMP Guidebook in EIS Section 2.2. Reclamation conducted several public scoping meetings in 2002 and 2003, and the primary issues that emerged from those meetings are summarized in EIS Section 2.2.1 and Table 2-1. Detailed information about the public scoping process is provided in the Public Scoping Report (URS 2006a), which is incorporated by reference into the EIS in Section 2.2.4. A discussion of the public outreach efforts and activities for the Draft RMP/EIS has been added to Section 2.2.4 of the Final EIS.

**R-2-10**

Downstream water supply and endangered species protection and enhancement were generally identified as issues to be considered in the development of the RMP alternatives. EIS Section 2.2.1 identifies “Water Quality” and “Natural Resource Management and Protection” as primary issues to be addressed in the RMP. These are broad categories that do not specify water quality downstream and protection of endangered species but are intended to encompass them. Section 2.2.2 of the Final EIS has been revised to specifically include downstream water quality and endangered species protection in the planning principles for the RMP alternatives.

Section 1.1 acknowledges the concerns expressed in the comment, stating: “[R]ecreational uses and improvements at the lake must be consistent with the original purpose of the Cachuma Project. They must not interfere with reservoir operations, which are focused on providing a reliable annual yield of high-quality water primarily for agricultural and municipal use. Recreational uses and improvements must also not interfere with protection of endangered species, particularly Southern California steelhead.”

See the response to Comment R-2-8 in regard to the statement that the RMP includes recreational activities at the cost of Reclamation’s obligation to operate Cachuma Lake for water delivery.

In response to the issue raised in footnote 7 of this comment, the Scoping Report was originally prepared as a freestanding document. In 2006, Reclamation and its subconsultant URS included the Scoping Report as an appendix in an administrative draft version of the RMP/EIS. Due to the quantity of comments received during public scoping, however, it was later decided that the Scoping Report should be maintained as a separate document. Therefore, the 2006 version does not contain any substantive differences from the original version of the Scoping Report reviewed by the commenter.

**R-2-11**

Reclamation acknowledges the approval and implementation of the 2004 Final EIS/EIR for the Fisheries Management Plan/Biological Opinion as well as the development of the NMFS Steelhead Recovery Plan and accompanying outline. Sections 3.4.4.2 and 4.4.7 of the Final EIS have been revised to discuss the 2007 Recovery Plan Outline, the plan in development, and the conformity of RMP fisheries management actions with Recovery Plan provisions.

As stated in EIS Section 1.1, the 3-foot increase in the maximum lake level (which was an outcome of the 2004 Final EIS/EIR) was assumed as part of current and future conditions. The RMP alternatives incorporate the surcharge requirement but do not propose any change in water release regimes. The RMP is a recreation planning document and has no authority over water supply operations. Specific release requirements in downstream waters and facilities such as the Hilton Creek Watering System are not related to the implementation of the RMP.

As stated in the response to Comment R-1-08, the Final EIS has been updated to include additional data for biological resources, water quality, air quality, greenhouse gases and climate change, and other resources. The additional data do not change the impact findings of the Final EIS.

See the responses to Comments R-2-12 and R-2-13 in regard to the issue of invasive mussels.

**R-2-12**

The potential damage that could result from an invasive mussel infestation is well documented, as indicated in the comment. The comment cites the California Science Advisory Panel's description of the threat posed by invasive mussels and the recommendation of "aggressive measures including closing lakes to boating until eradication efforts are completed" (California Science Advisory Panel 2007). The report recommends closing lakes to boating if the waterbodies have existing infestations. To date, no invasive mussels have been detected at Cachuma Lake. The California Science Advisory Panel report also states: "California and federal agencies should institute a mandatory boat inspection and cleaning system before allowing entry to high priority water bodies in California where access is under state or federal control." As described in Final RMP/EIS Section 3.9.9.2, a vessel inspection and quarantine program is in place at Cachuma Lake. Other measures could be considered based on best management practices as new information becomes available (see Final RMP/EIS Section 4.1.7).

The comment cites various other links from the CDFG's Invasive Species Program web page for quagga and zebra mussels. It should be noted that the main page (<http://www.dfg.ca.gov/invasives/quaggamussel/>), the Frequently Asked Questions: Quagga/Zebra Mussels handout (<http://www.dfg.ca.gov/invasives/quaggamussel/FAQs.pdf>), and the Invasive Mussel Guidebook for Recreational Water Managers and Users—Strategies for Local Involvement (California Resources Agency 2008) do not call for unilateral closures of waterbodies to recreational boating to prevent invasive mussel infestation. Rather, the emphasis is on prevention and containment through watercraft inspection and quarantine measures such as those already in place at Cachuma Lake.

The comment states that Lake Casitas, Western Lake in eastern Ventura County, and Lake Wohlford have been closed to nonresident boat use. Nonresident boating is currently allowed at Lake Casitas for vessels that pass an inspection and quarantine program. Westlake (not Western) Lake is in a private development where boating is already limited to residents and their guests by permit. Lake Wohlford is closed to private watercraft until the City of Escondido (San Diego County) can control boat access to the lake and implement an appropriate treatment for quagga mussels (<http://www.ci.escondido.ca.us/glance/lakes/wohlford/08-30-07.pdf>).

### **R-2-13**

Reclamation acknowledges that the public scoping for the RMP predated the discovery of invasive mussels in California waterbodies. However, the Draft RMP/EIS includes discussion of the quagga mussel in both the description of existing conditions and the impact analysis for the proposed alternatives (EIS Sections 2.5.2, 3.4.4.2, 3.9.2.2, 4.4.3.2, and 4.4.7). The Draft RMP/EIS recognizes the potential threat associated with invasive mussels, stating that they are known to clog waterways and pipelines, to create costly maintenance issues, and to pose serious ecological risks that can cause a shift in native species and a disruption of the ecological balance of entire bodies of water (Section 4.4.3.2, under “Fisheries and Aquatic Resources”).

Updated information about the potential impacts of invasive mussels to water supply facilities, water quality, and endangered steelhead has also been added to the Final EIS in Sections 3.4.4.2, 4.1.3, 4.1.7, 4.4.3.2, and 4.4.7.

Reclamation believes that together, the information presented in the Final EIS; the responses to Comments R-2-12, R-2-16, R-2-20; and other comment responses constitute the “hard look” at the invasive mussel issue required by NEPA.

The comment states that, as a result of new information about potential impacts of quagga and zebra mussels, one or more alternatives should be developed that provide for reduced recreational activities at the lake and for protection and enhancement of downstream water supplies and species. The comment does not provide evidence that reducing recreational activities that are already subject to protective controls will prevent an invasive mussel infestation at Cachuma Lake. Nor does the comment explain why the vessel inspection and quarantine program at Cachuma Lake is insufficient to protect downstream water supplies and species. The measures in place at Cachuma Lake are within currently acceptable protocols for decontamination of potentially infected boats (USFWS 2007), and, as stated in Sections 3.9.2.2 and 4.1.7, additional measures could be considered as new information about best practices becomes available.

Finally, the comment does not clarify how reducing recreational activities will provide greater protection and enhancement of downstream water supplies and species. Indeed, Comment R-2-12 acknowledges that not all methods of transferring mussels to a body of water involve a boat launch. As described in Section 4.1.3, recreation activities upstream and outside of Cachuma Lake that are not subject to protective controls also have potential to introduce invasive mussels into the Plan Area. Reducing recreational activities at Cachuma Lake would not address the potential for infestation from upstream sources.



The potential for reducing recreational activities is discussed in more detail in the response to Comment R-2-14, below.

**R-2-14**

See the response to Comment R-1-9 regarding the term “incidental recreation.” The purpose and need includes providing recreational opportunities to meet the demands of a growing, diverse population. This objective is consistent with the Congressional mandate in the Federal Water Project Recreation Act that Reclamation give full consideration to opportunities that a project affords for outdoor recreation. As described in the response to Comment R-2-8, alternatives that reduce recreational opportunities would not be consistent with the purpose and need.

However, the RMP allows the local managing partner to exercise a high degree of discretion and flexibility in both implementing and discontinuing proposed RMP actions in the Plan Area. As stated in Section 2.4.2.1:

“[T]he designation of allowable recreational uses in different geographic units of the Plan Area will not require the local managing partner to implement the designated uses. The RMP only indicates what lands are suitable for different recreation activities; it does not require the local managing partner to implement, facilitate, or encourage those activities. ... New recreational uses or activities allowed under the RMP may also be discontinued in the future at the discretion of the local managing partner if demand decreases, the activity is not economically viable, new security or safety considerations arise, and/or unforeseen significant environmental impacts occur that cannot be mitigated.”

Although the RMP does not include an alternative that specifically provides for less recreation than is currently allowed, Section 2.4.2 provides for recreational activities to be modified regardless of which RMP alternative is ultimately selected. In addition, Section 2.4.2.1 has been revised to state that the local managing partner has the option of *continuing existing uses* or pursuing new or modified recreational uses based on sufficient public demand, sufficient staffing and funding to manage the uses in accordance with the RMP, and potential for increased public benefits and use. Though not specified in Section 2.4.2, reasons for modifying recreational uses could include the potential for water quality impacts if invasive mussels are transported to Cachuma Lake by recreational boats or some other means. The local managing partner would have the discretion to implement additional boating management measures to avoid impacts related to invasive mussels, as described in Section 3.9.2.2.

Although the action alternatives evaluated in the EIS allow for additional recreation, the alternatives are essentially “recommendations for various resource management actions and facility improvement projects ... that *may be implemented*” (Section 2.4.2.2, emphasis added). The EIS analysis assumes full implementation of the proposed actions under each alternative to evaluate the impacts that could occur and the mitigation measures that would be required. An analysis that assumes less recreation than that associated with each alternative—or discontinuation of existing recreation—could understate the reasonably foreseeable effects of the RMP and would fail to satisfy NEPA’s mandate for Reclamation to take a “hard look” at potential impacts.

Further, as described in Section 2.4.2.4, Reclamation can amend the RMP based on changed environmental conditions; unforeseen events; changes in policies and land use plans that have been determined to be infeasible, impractical, or have undesirable consequences; changes in applicable laws and regulations; or other conditions.

The language in Section 2.4.2 therefore serves to balance the inclusion of existing and potential future recreation purposes with the other project purposes of water supply for municipal and agricultural users and fisheries protection, as mandated by the Cachuma Project, the NMFS Biological Opinion, and other authorities.

The Preferred Alternative would further avoid potential water quality impacts. Nonconformant marine engines will be phased out within 2 years, or if detectable pollutants are observed, within 6 months of detection (EIS Section 4.1.7). Finally, the Preferred Alternative would not expand boating capacities beyond No Action conditions: the motorized boat density would remain at 40 BAOT at minimum pool and 120 BAOT at maximum pool.

As discussed in Section 3.9.2.2, measures to prevent the transport of invasive mussels are in place at Cachuma Lake in accordance with California Fish and Game Code Section 2302. Therefore, the provisions of the RMP are consistent with State Assembly Bill 2065 and consistent with operations at other reservoirs (including drinking water reservoirs that allow recreation) throughout the state.

The Final EIS has been revised to include new Section 2.9, which discusses the reasons that an alternative that would reduce recreational opportunities in the Plan Area was eliminated from detailed study.

#### **R-2-15**

The comment that the EIS does not adequately evaluate the direct, indirect, and cumulative impacts of the RMP alternatives is addressed in more detail in the responses to Comments R-2-16 through R-2-19.

The environmental analysis of potential future activities and facilities is specific where possible and where an individual project footprint has been identified. Where the footprint of an activity or facility has not been determined, the EIS makes informed projections about what types of effects could result from construction and operation of an action. For example, the exact location of one or more new trails has not been determined, but in Section 4.4.7, Impact BI-3 identifies the foreseeable effects that would be associated with the construction of new trails, and Mitigation BI-3 lists reasonable measures that would be implemented that have been shown to be effective. Furthermore, implementation of any new activity or facility would only take place if demand warranted and if funding was available. As noted in the comment, no critical decision to act on any of the proposed activities or facilities has been made.

Reclamation notes and concurs with the comment that the environmental baseline of an EIS must be accurate and complete.

**R-2-16**

The comment states that the downstream environment below the Plan Area was not part of the description of baseline conditions required by NEPA. The environmental baseline of the Draft EIS describes water delivery facilities downstream of Bradbury Dam in Sections 3.1.1.1 (beneficial uses and downstream end users of Cachuma Project water; second paragraph) and 3.1.1.2, under “Santa Ynez River Watershed Surface Water Resources” (downstream river flows, second paragraph; Cachuma Project water delivery facilities below Bradbury Dam, sixth paragraph). Section 3.4.2 describes the biological setting as “composed of several large drainages including the Santa Ynez above and below the dam, DeVaul Canyon, Hot Springs Canyon, Windsor Canyon, Horse Canyon, Santa Cruz, Cachuma Creek, Hilton Canyon, and Tequepis Canyon.”

The Final EIS has been revised to include additional information about Southern California Distinct Population Segment (DPS) steelhead downstream of Bradbury Dam (Sections 3.4.5.2 and 4.4.7), water delivery facilities downstream of Bradbury Dam (new Section 1.1.2), and water releases for downstream fisheries protection (Section 1.1.4).

Reclamation acknowledges the potential impacts to Cachuma Lake and downstream facilities and resources that could result from invasive mussels, as described in the response to Comment R-2-13. Additional information about invasive mussels and their potential impacts has been added to Final EIS Sections 3.4.4.2, 3.9.2.2, 4.1.3, 4.1.7, 4.4.3.2, and 4.4.7.

The comment states that the risk of mussel damage will only become greater with the additional recreational activities proposed, including the introduction of additional boats and kayaks/canoes into the lake. As stated in the response to Comment R-2-15, the Preferred Alternative would not expand boating capacity beyond No Action levels. Moreover, vessels would continue to be subject to the inspection and quarantine program currently in place, and additional measures could be instituted to further avoid the risk of contamination by invasive mussels. The Final EIS (in Section 2.7.2 and elsewhere) has been revised to state that kayaks and canoes would also be subject to the same inspection, treatment, and quarantine protocols used for boats launching at Cachuma Lake.

The comment does not demonstrate how the current program is inadequate to prevent a mussel infestation. As discussed in the response to Comment R-2-12, the CDFG is promoting prevention and containment through watercraft inspection and quarantine measures such as those already in place at Cachuma Lake. The program is consistent with California Fish and Game Code Section 2302 requirements. The program also complies with the vessel cleaning and inspection protocol recommended by the 100th Meridian Initiative (<http://100thmeridian.org/Documents/Talking%20Points%20Regarding%20Western%20Quagga%20Mussels.pdf>), a cooperative effort between state, provincial, and federal agencies to prevent the westward spread of invasive mussels and other aquatic nuisance species in North America.

In addition, the comment states that boats and kayaks are “known means of transport” for invasive mussels, but an earlier comment (R-2-12) acknowledges that mussels can reside on anything that comes in contact with a water body, including shoes and pets. Therefore, reducing recreation at Cachuma Lake would not address the potential transport of invasive mussels by

nonrecreationists such as water facilities support staff, or by recreationists using the Santa Ynez River upstream of Cachuma Lake for watercraft activities that are not subject to inspection or quarantine protocols for invasive species. Reclamation and the local managing partner will continue to enforce appropriate vessel inspection and quarantine measures and consider additional best management practices as they become available. Additional discussion about mitigation has been added to Final RMP/EIS Section 4.1.7.

**R-2-17**

See the response to Comment R-1-18 in regard to effects of the stocking program at Cachuma Lake on downstream fish, including endangered steelhead, in terms of predation and interbreeding. Sections 3.4.4.2 and 4.4.7 of the Final EIS have been revised to discuss the 2007 Recovery Plan Outline, the plan in development, and the conformity of RMP fisheries management actions with Recovery Plan provisions.

Transporting steelhead above Cachuma Lake and fish passage upstream of the dam are not addressed because the RMP does not propose management actions that affect the potential passage of steelhead.

The statement that the CDFG would prepare a Fisheries Management Plan was an editorial error that has been corrected in the Final EIS. The Fisheries Management Plan would be prepared by the local managing partner; a separate plan would not be prepared by the CDFG. The plan would only be prepared under the action alternatives (2 and 3); Alternative 1 is the No Action Alternative. The plan would be prepared soon after the RMP is final and would be updated periodically to reflect new information and changing conditions.

**R-2-18**

The concerns raised in the comment are addressed in the responses to Comments R-1-19 and R-1-20.

**R-2-19**

Sections 4.2.7 and 4.4.7 have been revised to include additional discussion of cumulative impacts. Responses to specific comments about impacts of recreation on downstream water quality and past, present, and reasonably foreseeable future actions are addressed in responses to Comments R-2-5 through R-2-18. The RMP includes analysis and reasonable mitigation for RMP-specific and cumulative impacts.

**R-2-20**

See the response to Comment R-1-14 in regard to the level of detail of, and funding for, mitigation measures. Additional discussions of water supply impacts and mitigation related to invasive mussels—including methods that could be used to remove mussels from water supply facilities—have been added to Final RMP/EIS Sections 4.1.3 and 4.1.7.

As stated in the responses to Comments R-2-12 and R-2-16 and Section 3.9.2.2, the watercraft inspection and quarantine measures in place at Cachuma Lake are consistent with California Fish



and Game Code Section 2302 requirements as well as the vessel cleaning and inspection protocol recommended by the 100th Meridian Initiative, CDFG, USFWS, and the Invasive Mussel Guidebook for Recreational Water Managers and Users--Strategies for Local Involvement (California Resources Agency, October 2008). Final RMP/EIS Section 3.9.2.2 describes the updated Santa Barbara County protocol for vessels at Cachuma Lake (August 2009), and the protocol can be modified as necessary as new information becomes available. The program applies to nonresident boats because boats that are currently moored at the marina and are not removed from the lake, boats that are owned and operated by the County-approved rental boat concessionaire that are permanently used and stored at the Lake, and County-owned boats that reside at Cachuma Lake would have no means of transporting invasive mussels from an infested waterbody. The Final EIS has been revised to state that kayaks and canoes would be subject to the same inspection, treatment, and quarantine protocols as those for boats launching at Cachuma Lake.

It should be noted that the statement “no safe remedy is currently available for eliminating (invasive mussels) from a water body once it is infested” has been deleted from the RMP/EIS. Updated information on mussel control and eradication methods (Section 4.1.7) includes cases and ongoing research for eliminating infestations without jeopardizing water quality or natural resource protection.

The comment makes a number of statements about economic assumptions:

- The mitigation described in the EIS, and the EIS itself, “appears to be based on misleading economic assumptions.”
- “NEPA requires agencies to balance a project’s economic benefits against its adverse environmental effects. (Calvert Cliffs’ Coordinating Comm. v. United States Atomic Energy Comm’n, 449 F.2d 1109, 1113 (D.C.Cir 1971).”
- “The use of inflated economic benefits in [balancing economic benefits against adverse environmental effects] may result in approval of a project that otherwise would not have been approved because of its adverse environmental impacts.”

Each of these points is addressed below.

**Misleading Economic Assumptions.** The first bulleted item does not clarify how the proposed mitigation is based on misleading economic assumptions. Reclamation recognizes the expense that could result from an invasive mussel infestation. Section 4.1.7 has been updated to describe a number of reasonable mitigation measures and a general description of costs and funding of mitigation.

**Balancing Economic vs. Environmental Effects.** Strictly speaking, NEPA only requires a cost-benefit analysis if it is relevant to the choice among environmentally different alternatives (NEPA Section 1502.23). It is not clear how a cost-benefit analysis would reveal substantive differences among the proposed alternatives, especially in regard to the issue of invasive mussels. The primary defense mechanism against an invasive mussel infestation is the inspection and quarantine program that is in currently in place. The program will remain in place regardless of which RMP alternative is selected. Moreover, any other invasive mussel prevention, control,

or eradication measure that is implemented in the future would take place regardless of which RMP alternative is selected.

**Inflated Economic Benefits.** The RMP/EIS does not state that economic benefits of any of the alternatives would outweigh their environmental impacts, or that recreation would increase economic benefits. As pointed out in the comment and described in RMP/EIS Section 2.2.3 (under the subheading “Fiscal Limitations”), management actions are constrained by limited funding.

NEPA requires an EIS to discuss the probability of mitigation measures being implemented (NEPA Forty Most Asked Questions Concerning CEQ’s NEPA Regulations, No. 19b, 46 Fed. Reg. 18026 [March 23, 1981], as amended, 51 Fed. Reg. 15618 [April 25, 1986]). Funding is only one element that determines the probability of implementing mitigation. In the case of actions to eradicate invasive mussels, all eradication methods described in Section 4.1.7 are essentially feasible, although some methods are still in the research and development stage. Feasibility of funding the measure would depend on the scope of the problem and the type of control and/or eradication method.

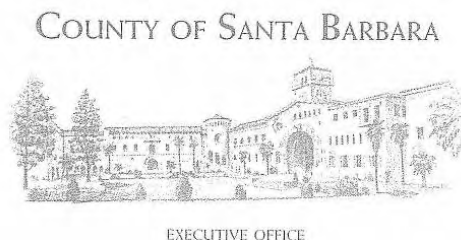
See the response to Comment R-2-13 in regard to the “hard look” requirement.

**R-2-21**

This summary of previous comments is noted.

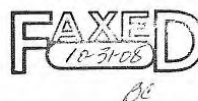
**R-3 John Baker, County of Santa Barbara and County Parks**

Michael F. Brown  
County Executive Officer



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Santa Barbara, California 93101  
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October 31, 2008



Robert Epperson  
GCAO Representative  
1243 N Street  
Fresno, CA 93721-1813

FAX: 559-487-5397

RE: Cachuma Lake Draft Resource Management Plan/Environmental Impact Statement

Dear Mr. Epperson:

Thank you for the opportunity to comment on the Cachuma Lake Draft Resource Management Plan/Environmental Impact Statement. At this time, the County is submitting the attached letter detailing comments from the Parks Department. This comment letter includes a twelve page attachment containing numerous comments. The County also submits additional remarks for your consideration:

**3.8 Land Use**

**R-3-1**

**3.8.1.1 Regulatory Setting**

The Draft RMP indicates "All applicable Santa Barbara County land use policies have been reviewed and are consistent with the RMP planned activities (URS 2006d)." This section should contain a discussion of all General Plan policies examined and applicable to the proposed project. A determination of any inconsistencies between the proposed project and applicable general plan policies outlined in this discussion should be provided pursuant to CEQA Guidelines §15125(d).

The County has no further comments on this project at this time and looks forward to continued dialogue on future projects. If you should have further questions, please do not hesitate to contact my office directly, or David Matson, Deputy Director in the Office of Long Range Planning at (805) 568-2068.

John Baker  
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jbaker@co.santa-barbara.ca.us

Terri-Maus-Nisich  
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Robert Epperson, GCAO Representative  
October 31, 2008  
Page 2 of 2

Sincerely,



John Baker  
Assistant County Executive Officer

cc: John McInnes, Director, Office of Long Range Planning  
David Matson, Deputy Director, Office of Long Range Planning  
Juan M. Beltranena, Project Manager, County Parks Department

Attachment: County Parks Department Letter, October 30, 2008





Attachment

**Daniel C. Hernandez, MPA**  
Director of Parks  
(805) 568-2461

October 30, 2008

**Michael Gibson, MPA**  
Business Manager  
(805) 568-2477

Robert (Bob) Epperson  
GCAO Representative  
1243 N Street  
Fresno, CA 93721-1813

**Juan Beltranena, AIA, AICP**  
Project Manager  
(805) 568-2470

**Jeff Stone**  
North County  
Deputy Director  
(805) 934-6145

RE: Cachuma Lake RMP  
Comments from Santa Barbara County Parks Department

**Erik Axelsson**  
South County  
Deputy Director  
(805) 681-5651

Dear Bob,

**R-3-2**

Thank you for the opportunity to review and comment on the Lake Cachuma RMP. Attached with this letter please find a table with our comments organized by page number. The comments reflect the input of various Parks personnel and thus, may occasionally be repetitive.

**Park Administration Office**  
610 Mission Canyon Road  
Santa Barbara, CA 93105  
Tel: (805) 568-2461  
Fax: (805) 568-2459

If you have any questions, please do not hesitate to contact me at (805) 568-2470 or e-mail me at [jbeltranena@co.santa-barbara.ca.us](mailto:jbeltranena@co.santa-barbara.ca.us)

**North County  
Park Operations**  
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Sincerely,

**South County  
Park Operations**  
4568 Calle Real, Building E  
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Fax: (805) 681-5657

*Sonia Thompson*  
for  
Juan M. Beltranena, AIA, AICP  
Project Manager

**Cachuma Lake  
Recreation Area**  
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Attachments:

Parks Department Comments (Cachuma Lake Draft Resource Management Plan / Environmental Impact Statement June 2008)

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## Appendix B

### Responses to Comments on the Draft RMP/EIS

County Parks Department Comments

Cachuma Lake Draft Resource Management Plan / Environmental Impact Statement June 2008

EIR Section	Page No.	Comments to Cachuma Lake RMP / EIS document dated June 2008
Executive Summary	ES-1	<p>2<sup>nd</sup> paragraph should include day-use picnic facilities, large group camping facilities, maintenance facilities and infrastructure facilities, scenic overlook for Bradbury Dam, Live Oak Camp and Camp Whittier. Last sentence should begin “The <b>remaining</b> open space...”</p> <p>3<sup>rd</sup> paragraph, second sentence should be clear about recreation mandate “... , while enhancing <b>mandated</b> recreational uses...”</p> <p>4<sup>th</sup> paragraph, 1<sup>st</sup> sentence should read “ , and management of the <b>surrounding lands Plan Area.</b></p> <p>15<sup>th</sup> paragraph should read “<del>Then</del> The impacts ... , and <del>then an</del> impact summary ...”</p>
1.1	1-1	<p>Include day-use picnic facilities, large group camping facilities, maintenance facilities and infrastructure facilities, scenic overlook for Bradbury Dam, Live Oak Camp and Camp Whittier.</p> <p>3<sup>rd</sup> paragraph, second sentence should read “ The <b>50 year</b> contract expired in 2003 and has been extended through...” Also, there is language on this section that states that Reclamation will develop a new management contract with the County –this statement should be deleted and language inserted to the effect that Reclamation will seek a long term agreement with a “local managing partner” ....</p> <p>5<sup>th</sup> paragraph insert that recreation is a mandated component “Reclamation lands as appropriate for <b>mandated</b> recreation and”</p> <p>Also please clarify that the Cachuma Project (Project) and “the Project” are one and the same.</p>
2.4.2	2-8	Under Roles of Reclamation and Local Managing Partner; 3 <sup>rd</sup> paragraph “A term of <b>in</b> the agreement will specify that any other agreements <b>executed by the Bureau</b> affecting management of the Plan Area...” are there any other agreements currently in place? If so, they should be listed here.
2.4.3.4	2-10 & 2-11	Under <b>Amendments to the RMP</b> the text should include language to the effect of the following; “ <b>The agreement with the local managing partner would be amended as necessary to address these amendments or changes to the RMP.</b> ”
2.5.1	2-10	<p>1<sup>st</sup> paragraph defines what the County Park is, but does not define what Live Oak Camp is. Please insert a sentence defining <b>Live Oak Camp</b> as well...</p> <p>First bullet should read “Operate(,)maintain and upgrade... , to meet demand and applicable state health requirements <b>and operate under all lake levels meeting health requirements.</b>”</p> <p>7<sup>th</sup> bullet should include cabins as well after RV Trailers. Also change text to say: “paved roads for <del>bikes</del> <b>that can accommodate biking;</b>”</p> <p>11<sup>th</sup> bullet, add at the end “<b>from execution of a long term agreement with the local managing partner</b>”</p>
2.5.2	2-12	<p>See text inserts – language in first paragraph should be revised to ensure that UCSB is responsible for <u>funding</u> and <u>relocating</u> facilities if necessary to accommodate camping/boat launch facilities. “UCSB <b>may be required to relocate their</b> crew facilities...”</p> <p>2<sup>nd</sup> paragraph, last sentence, “Section 3.9.2.2 outlines the <b>currently existing</b> pre-launch protocols ...”</p>

1 of 12

G: Parks SB/Winword/Lund/Cachuma/RMP Parks Comments

## Appendix B

### Responses to Comments on the Draft RMP/EIS

County Parks Department Comments

Cachuma Lake Draft Resource Management Plan / Environmental Impact Statement June 2008

EIR Section	Page No.	Comments to Cachuma Lake RMP / EIS document dated June 2008
		3 <sup>rd</sup> paragraph, language about roads should read “paved roads for <i>that can accommodate</i> bikes, ...”
2.5.4	2-13	First paragraph mentions a Capital Improvement Plan – here is a good place to further define what this is e.g. Santa Barbara County’s Five Year Capital Improvement Program that includes improvements for Lake Cachuma or a separate Capital Improvement Plan? Either way, the Capital Improvement Plan should be an appendix to the RMP as it infers that there are ‘projects’ that would be implemented under all RMP alternatives.
2.5.6	2-13	3 <sup>rd</sup> paragraph should read “ Stretches of roads prone to flooding will be <i>fixed improved</i> , especially ...”
2.6.2	2-14	2.6.2 Should include the scenic overlook for Bradbury Dam.
2.6.3	2-14	2.6.3 - suggest that maximum and minimum pool of boats have a lake elevation associated with them.
2.7.2	2-16	10 <sup>th</sup> paragraph begins discussion of the number of boats on the lake - comment should be inserted that this number <i>excludes kayaks/canoes</i> – language should be consistent throughout document – particularly in alternatives where kayaking/canoeing is proposed.
2.7.3	2-17	Second bullet needs to be revised –bullet proposes that all day use be relocated up to pool/fun center area to consolidate day-use activities. The current day use area (proposed to be relocated) offers scenic views of the lake – this is not the case up by the pool (noise, traffic). If camping is proposed in the north plateau day use area, similar day-use facilities should be offered other than at the fun center.
2.7.3	2-17	<b>Alternative 2 Delete</b> “Relocating Day Use areas from existing area to near pools”: The proposed relocation is out of view of the lake (a main reason visitors come) and adjacent to the highway and the noise of the pools (in summer)--denying day-users of a positive outdoor experience. There are no other beautiful areas that overlook the water and feel separate from the campground to have picnics besides the existing day use area along the east peninsula of the park.
2.8.2	2-19	Alternate 3 proposes both RC airplane area and additional camping and day use facilities to be located on the mesa east of Mohawk and Jackrabbit flats. Language should be included here, and throughout where this statement is made, that RC airplane site must be in an area that would not conflict with <b>additional</b> day use and camping proposed in the same area. The RMP reads as though the RC site should not conflict with existing uses only. A use compatibility study should evaluate whether these two uses are in fact compatible. First mention of Figure 3.9-1 – is supposed to show <i>all</i> swim areas – this figure does not specifically show/name Drake’s Cove.
2.8.2.1	2-20	Harvey Cove should reflect there is a “... <i>ADA Accessible</i> fishing pier ...” Also, add that Mohawk Shores “ <i>is identified a future boat launch area.</i> ”
2.8.2.2	2-20	Radio-controlled airplanes:

2 of 12

G: Parks SB/Winword/Lund/Cachuma/RMP Parks Comments

## Appendix B

### Responses to Comments on the Draft RMP/EIS

County Parks Department Comments  
Cachuma Lake Draft Resource Management Plan / Environmental Impact Statement June 2008

EIR Section	Page No.	Comments to Cachuma Lake RMP / EIS document dated June 2008
		<ul style="list-style-type: none"> <li>▪ The RMP does not stipulate frequency of access to the site by the model airplane group other than limiting access to Sept 1 – Feb 1. The implication is that they could stage events every weekend or any weekday. The RMP should clearly state any and all months (inclusive of clarification for weekdays and weekends) in which model airplane use allowed and/or prohibited.</li> </ul> <p>The RMP should further analyze model airplane noise and associated environmental impacts. A use compatibility study for RC Airplanes should be prepared, and should take into account the following:</p> <ul style="list-style-type: none"> <li>▪ The effects of the noise pollution the planes would create and the numbers of people who would be affected.</li> <li>▪ Planes can be heard from as far away as the marina and surrounding areas.</li> <li>▪ The noise issue is inconsistent with expanding camping in the area.</li> <li>▪ The proposed site for model airplanes is the richest <i>within the campground</i> with regard to bird life, especially in winter.</li> <li>▪ Bird watching is a growing and lucrative tourism draw, with high potential increase at Cachuma Lake.</li> <li>▪ The Wildlife Cruises regularly rely on this area for excellent viewing opportunities.</li> <li>▪ The area is commonly occupied by great blue heron, osprey, common goldeneye, great egret, common merganser in winter/spring season. The concern is that the model activity would be disruptive to these species' foraging and perching habits.</li> <li>▪ Area is the only area we see white-tailed kites within the Park.</li> <li>▪ Area is far from the Bald Eagle nesting area, but used routinely as a winter foraging area.</li> <li>▪ Winter 2005/2006, there were 13 sightings of bald eagles in the Martini Cove/Jackrabbit Flats area documented during lake cruises, alone.</li> </ul> <p>This RC Airplane use also interferes with "Increased camping and day use at Mohawk Shores, Jack Rabbit flats" (See page 2-19 Section 2.8.2)</p>
Table 2-3	2-28	Table 2-3 – here and in other places the document mentions "paved roads for bikes" this statement should be refined to read ; " <i>paved roads that could accommodate biking</i> ".
Table 2-3	2-30	Habitat Natural Resource Protection Section indicates that "Mitigation lands may be needed if new facilities are built. Should read; "Mitigation lands <i>within the Plan Area</i> may be needed...." However please note that mitigation is not a management element.
3.4.3 Upland Habitats	3-18	<p>Native Grassland</p> <p>The RMP should broaden the discussion of native grass lands to take into account the following:</p>

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		<ul style="list-style-type: none"> <li>Discusses "native grassland" as being only 5 acres (Table 3.4-1) and limited in the Plan Area.</li> <li>Extent of native grassland is vastly underreported.</li> <li>There are native grass species on the north shore in the grazing area.</li> <li>Flat terraced areas are called non-native grassland, yet at least Purple Needlegrass, <i>Nassella pulchra</i>, is present, even if not in pure stands.</li> <li>Consideration of the presence of native species within "non-native grasslands" should influence grazing management and restoration potential.</li> </ul>
3.4.3 Upland Habitats	3-18	<p>Pine Woodland: Miss-stated species</p> <p>Last sentence in paragraph needs correction from Coulter Pine to Gray Pine: "<del>Coulter Pine</del> <b>Gray Pine</b> towers over associated canopy trees. . . ."</p>

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2.4.3 Riparian and Wetland Vegetation	3-19	<p>Riparian Oak Woodland: Typo</p> <p><del>Mourning</del> Morning Glory</p>
3.4.3 Riparian and Wetland Vegetation	3-20	<p>Freshwater Marsh:</p> <p>The lead agency should add the following sentence to end of paragraph:</p> <p>Thick, dense areas of bulrush (<i>Scirpus</i> species) become established and cover shallow inundated areas of shoreline at high lake capacity at the back of Cachuma Bay, on the west shore of the entrance to Santa Cruz Bay, and along the east and shores near Arrowhead Island. These areas become productive breeding areas for Western and Clark's Grebes, American Coots, Ruddy Ducks, and other species.</p>
3.4.3 Invasive Exotic Plants	3-20	<p>Invasive Exotic Plants:</p> <ul style="list-style-type: none"> <li>Add <i>Tamarix</i> species to the 10 noxious species cited in the document as high alert species listed by the California Invasive Plant Council. Occurs and is spreading in riparian areas of the Plan Area.</li> <li>The County Agricultural Commissioner's office has been surveying for this and other nuisance species at the lake.</li> </ul> <p>The RMP should further provide further analysis to the discussion of Disturbed Areas, and include the following additional information:</p> <ul style="list-style-type: none"> <li>Need mapping in the campground for the purposes of weed eradication.</li> <li>Show these areas that generally skirt perimeter of entire campground.</li> <li>RMP should indicate that when lake level is low, the exposed shoreline is often dominated by invasive exotic species such as Bull Thistle (<i>Cirsium vulgare</i>)</li> </ul>

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		and Italian Thistle ( <i>Carduus pycnocephalus</i> ). <ul style="list-style-type: none"> <li>Include a Vegetation Management Plan that consider options for control of "plant pollution" when high water capacity recedes around the lake.</li> </ul>
3.4.4.1 Avian Habitats	3-21	<b>Deep Water</b> The lead agency should add the following last two sentences to the following: Of all species, the three most consistently found in deeper waters around the lake are the common loon, a wintering bird at Cachuma Lake, and Western and Clark's grebes, present year round, including breeding season. In winter grebes can be found in large numbers around the lake.
Table 3.4-2	3-24	Correct spelling to: Hooded Merganser Bald Eagle: Not the only breeding location. Change to <i>one of several</i> breeding locations.

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3.4.4.1 Water- dependent Birds	3-25	With respect to water-dependent birds, as the RMP states, "... certain areas can be identified as particularly important." Santa Cruz Bay, among others, is listed as most productive for water dependent birds, and this bay together with the east end and Cachuma Bay are important for breeding grebes.  Opening these areas to visitor access, as listed in Alternative 3, would not only be detrimental to the bird species themselves, but also to the wildlife values on which the lake cruises depend. The cruise is an important source of funding for the Park, and it has important growth potential. Parks recommends deleting this option.
3.4.4.2 Fisheries and Aquatic Resources	3-28	<b>Invasive Species</b> The lead agency should add the following adding to end of paragraph: Together with other county agencies and the executive office, Santa Barbara County Parks established and enforces strict boat launching criteria to prevent quagga and zebra mussel introduction. Parks has had an early detection monitoring program since summer 2007
3.4.4.6 Game Species	3-30	Section <b>3.4.4.6 Game Species</b> makes no mention of <i>cougar or mountain lion</i> . Please include these species in the discussion.
3.4.4.6 Game Species	3-30	<ul style="list-style-type: none"> <li>If under Alternate 2 or Alternate 3 the north shore opens up to visitors, we should expect a higher incidence of poaching. Thus adequately trained staff and agreements with the Dept of Fish and Game for increased patrols must be prepared.</li> </ul>
Table 3.4-4	3-31	Southwestern Pond Turtle

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Sensitive Wildlife Species		The lead agency should add the following to the Notes Section: Known to occur in the Plan Area and in pools downstream of Bradbury Dam
3.4.5.2 Special Status Wildlife	3-35	Southwestern Pond Turtle The lead agency should revise the first sentence to two sentences: Habitat for the southwestern pond turtle occurs in the Plan Area in Cachuma Bay, Santa Cruz Bay, and potentially in other areas. It also exists throughout the Santa Ynez River watershed including the main stem of the river below Bradbury Dam.
3.4.5.2 Special Status Wildlife	3-35	Spotted Owl: Note in this section the following: <ul style="list-style-type: none"> <li>Potential presence of spotted owl in the Plan Area may be underreported.</li> <li>Spotted Owl responded to calls in a wooded canyon south of the Plan Area in December 2005 (Holmgren 2005).</li> </ul>

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3.4.5.2 Special Status Wildlife	3-35	Bald Eagle Additional analysis should be completed regarding the known presence of bald eagles and environmental impacts associated with Alternatives 2 and 3) RMP states that Bald Eagles (BAEA) are an “inconsistent winter visitor and rarely breed,” and that the “... species is very rarely seen anywhere else in Santa Barbara County.” <b>Statements are inaccurate.</b> Make corrections to reflect the following: 1) Bald eagles are consistent visitors to the Plan Area in winter. Parks designs its winter lake cruises around the “Eagle Season” from November through February. Up to seven sightings a-trip during cruises have been documented by the park naturalists for many, many years. 2) As the RMP itself states, several years of breeding records of BAEA in the area (adjacent to but not within the Plan Area) were compiled by Paul Lehman in the 1994 edition of his book, <i>Birds of Santa Barbara County, California</i> . Nesting was documented in 1989, 1990, 1992 (suspected), 1993 and 1994. Since those years, Park Naturalists documented one year of definitive breeding (sighting of chicks in nest), and there is ample anecdotal evidence of successful breeding in many other and recent years. Park staff does not have access to the nest; however, eye witnesses who do have access have confirmed breeding. 3) Bald eagles are seen regularly and at least two pair of eagles are nesting on the Santa Barbara Channel Islands, where an active reintroduction program is in effect. This larger recent population may be influencing the frequency of sightings at Cachuma Lake. Park Naturalists have documented sightings of tagged BAEA



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		<p>from Santa Cruz Island.</p> <p>The RMP cites the Bald Eagle Management Plan of 1989, which recommended limiting public access to bald eagle perching, foraging, roosting and nesting sites. The RMP itself states, "The presence of this continually successful bald eagle nest should signal the importance of protecting resources within the Plan Area and surrounding lands that support these breeding eagles and their young," and "All future management decisions involving the Plan Area should continue to take this Plan into consideration."</p> <p>Expanded recreational activities such as kayaking activities in Alternative 2 and camping and day use activities in Alternative 3 in the Santa Cruz drainage are in conflict with this advisory. It is well known that human presence can constitute a disturbance and cause bald eagles to abandon a nesting area.</p>

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3.4.5.2 Special Status Wildlife	3-37	<p>Peregrine Falcon:</p> <p>Presence is underreported. RMP states, "It occurs rarely in the Plan Area during the winter ..." It is true that during surveys in 2001-2003 peregrine falcons were not observed.</p> <p>Add the following language to this paragraph:</p> <p><b><i>More recent data, however, demonstrates that great variation in falcon presence can occur from year to year: The county park naturalists' bird log reports 16 individual sightings in winter 2003 and 41 individual sightings in winter 2004, including 12 occurrences of pairs. Naturalists Mason and Pedersen observed the pair repeatedly, over two weeks, alighting on a specific cliff and vocalizing, possibly indicating the pair may have been looking for nesting habitat. This was observed in 2003 and 2004.</i></b></p>
3.7.2	3-50	First paragraph should include the scenic overlook for Bradbury Dam.
3.9	3-56	<p>Section 3.9 Recreation – First paragraph again mentions that Reclamation is developing a new management contract with the County and is currently producing an updated RMP – this language regarding the RMP is awkward. Should be re-stated to include that an original RMP was part of 50 year agreement with County if they are going to call this current RMP/EIS an <i>update</i> RMP.</p> <p>Delete language regarding the development of an agreement "<b><i>with the County</i></b>". Should read "the development of an agreement with the managing partner.</p>

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3.9.1.2 & Table 3.9.1	3-58 & 3-59	Lake Casitas has a small water park and swimming facilities
3.9.2.2	3-64 & 3-65	This section bullets the protocols currently in place for monitoring mussels / boat inspections. While other areas in the document provide for stricter measures / changes if the program requires it, suggested language before the listed bullets could be; "The protocol is considered an adaptive management program and as more is understood regarding the mussel threat to Lake Cachuma, this protocol may be modified or revised."
3.10.2	3-77	States that "paving maintenance is <del>planned for completion in 2006</del> " – should be revised to reflect current situation. Maintenance of roads is <b><i>"... planned for completion in 2009."</i></b>
3.11.1.6	3-80	3.11.1.6 - should include the water well that services Live Oak Camp and Camp Whittier. The following section under Sewer System discusses the surcharge coming within 50 feet of the lift station as though there were no plans for relocation. To be consistent with this, the Potable Water system should include a statement as to the effects on the water treatment plant in its current location OR include a statement that funds are being sought and design is underway for the relocation of the water treatment plant out of the surcharge zone.
3.11.1.8	3-81	3.11.1.8 Chemical and Vault Toilets – either in this section or the preceding Sewer System section, language should be included to the effect that <b><i>"a septic system services the shower building, host site and 'kitchen' area at Live Oak Camp."</i></b>
4.1.7	4-7	Mitigation WQ-1. The last sentence should be re-written as follows: "This phase-out would occur <b><i>within X (3? -6?) months from</i></b> when <del>in the year</del> detectable pollutants are observed." The sentence as written doesn't make sense if the detection occurred in December, or likewise, a January detection would allow almost 12 months to remove 2-strokes.
4.1.7	4-8	Mitigation WQ-5. The third and fourth bullets should be combined into one bullet.
4.1.7	4-8	This section should add the following language: Implement water quality testing adjacent to suspect waste facilities
4.1.7	4-8	Why are no mitigations proposed for cumulative impacts? The RMP should analyze cumulative environmental impacts and outline required measures necessary to mitigate these impacts.
4.3.5 Land Management	4-15	Vegetation Management Plan should be under "Grazing management Plan"
4.3.7 Impacts Summary	4-17	Mitigation SG-3; Please reference what is "Land Facilities Management guidelines" and where this document can be found .

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4.3.7 Impacts Summary	4-17	<p>LFM 5.2.1 references a “RMP Rangeland assessment and Grazing Management Plan” the RMP should indicate where this reference came from and where it can be located for future reference? It also indicates these plans will be reviewed and approved by the “manager” every five years. The RMP should define who the manager is.</p> <p>The lead agency should make LFM 5.2.1 a requirement for review and approval of the RMP Rangeland Assessment and Grazing Management Plan consistent with Mitigation WQ-4 (page 4-8) that requires an annual report.</p>
4.3.7	4-17	LFM 5.2.5 and LFM 5.2.6 - These references are circular in that the RMP and Rangeland Assessment and Grazing Management Plans are yet to be completed.
4.3.7	4-17	Include Grazing and Vegetation Management Plans under Alternative 1 as they are also necessary to manage existing grazing contracts and prescribed burns.
4.3.7	4-17	<p>Vegetation Management Plan, Grazing</p> <p>Include language that reflects the following or include a protocol to address the following issues:</p> <ul style="list-style-type: none"> <li>▪ Parks needs a protocol for handling fence breaches.</li> <li>▪ Steps need to be in place to hold lessees accountable.</li> <li>▪ Areas in Santa Cruz Bay are repeatedly being trespassed by cattle; paths are worn in the trespassed areas.</li> <li>▪ When breaches occur, lessee should be contacted immediately to remove the cattle that day or no later than the next.</li> <li>▪ Require lessee to report to Parks the location of the breach; repair within established timeframe.</li> </ul>
4.3.7	4-17	<ul style="list-style-type: none"> <li>▪ Need reassessment of appropriate time and duration of “seasonal” grazing. States “Lease 1 and east side of Lease 3 shall be grazed only seasonally, from fall to early summer to protect perennial bunchgrasses and oak seedlings.” This allows grazing during the growing season of both oaks and native grasses. Acorns drop and germinate with the onset of winter rains. Native perennial grasses come out of dormancy and can bloom from Jan –June. Grazing grasses prior to reproductive stem elongation reduces reproductive success.</li> <li>▪ The RMP should contain an adaptive management protocol.</li> </ul>
4.3.5 – 4.3.7	4-15 – 4-18	A couple of documents are first mentioned here. The RMP Rangeland Assessment and Grazing Management Plan and the Land Facilities Management Plan – are these both current and in place plans? If not, include in the RMP. If there is a Grazing Mgmt. Plan in place then grazing mgmt should not be again proposed under the Vegetation Mgmt Plan (pg 4-15).
4.4.3.1	4-20	Section 4.4.3.1. Again, missing reference to Live Oak Camp and Camp Whittier (RMP sometimes referenced this as Boys & Girls club camp as well – should be

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		consistently referred to as Live Oak Camp and Camp Whittier).
4.4.3.2	4-21	Weed Control: Revise third sentence as follows: "This weed control program would focus on eradicating existing invasive plant species and on preventing noxious weeds from spreading . . . ."
4.4.4.2	4-23	Natural Resource Management: RMP should also include Trail, Fish, Vegetation, Boating Management Plans under Alternative 1. Such plans are warranted now, and especially with expected population increases.
4.4.5.1	4-26	Grazing Management A Grazing Management Plan should consider a rest-rotation schedule within portions of the largest lease area, if grazing is continued under Alternate 1 or Alternate 2. With monitoring of grazing impacts, as the RMP said there would be, effects of a rest-rotation system could be monitored as well, to help to develop a standard grazing protocol in the Plan Area. This would optimize the growth and reproduction of native grasses and other plants. Rest-rotation includes assessing vegetation biomass, moving cattle at appropriate times to appropriate pastures, and resting certain pastures for a year or more. Such a system could be developed in conjunction with the fire management plan, as suggested elsewhere.
4.4.5.2	4-26	Camping and Recreation: To end of sentence that begins: "Picnic areas at the upper end of Cachuma Bay. . .," add: ". . . as well as potential southwestern pond turtle egg nests."
4.4.5.4	4-28	General comment: According to the RMP, camping and recreation on the north shore will have minor impacts, however, repeated human presence in bald eagle day roost and foraging areas such as Santa Cruz Bay will disturb bald eagles; this is in conflict with their State endangered status. This would become an even greater concern during lower lake levels due to drought conditions, because of a reduction in foraging areas around the lake. Parks recommends that camping and recreation on the north shore not be allowed.  Further, impacts to visitor experiences on the lake cruises due to recreational access and potential disturbance to wildlife on the north shore has not been addressed in the RMP, please address this issue.  If human disturbance causes charismatic mammals and birds to flee from and eventually abandon reliable foraging areas, this would diminish the quality of lake cruise excursions and have a potentially negative fiscal impact on Park revenues and recreation opportunities. We recommend that human disturbance not be allowed.

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4.4.5.4	4-28	Trail Use: Suggest placing new trails away from Santa Cruz Creek drainage altogether to avoid bald eagle and raptor disturbance
4.4.5.4	4-28	Boat Use: Though motor powered boats would be restricted from entering Cachuma Bay, kayaks would be permitted under Alternative 2. Kayak presence (and no motorized boats) in Cachuma Bay may also disturb bald eagles (and other species). Therefore, calling the overall impact of kayaks to special status species “beneficial” is not accurate. It should be identified as a minor impacts. Kayaks can potentially travel further into vegetation and disturb foraging and nesting waterfowl, and reduce the prey base for special-status species, this is an impact.
4.4.6.3	4-31	Camping and Recreation: Typo: does docks
4.4.6.4	4-32	Camping and Recreation: States, “High levels of disturbance within a ½ mile radius of a nest site. . . could cause the bald eagle to abandon nesting areas. . .” Even low levels of disturbance could cause abandonment of an eagle nesting or foraging area. We recommend that no disturbance of nesting sites be allowed.
4.4.7 Mitigation BI-1	4-33	Fourth bullet: Oak tree replacement should be consistent with the County of Santa Barbara Deciduous Oak Tree Protection and Regeneration plan: 10:1 for evergreen, 15:1 for deciduous.
4.4.7	4-34	(4) Impacts to bald eagle disturbance in foraging areas must also be monitored. Disturbance in foraging areas near nesting area may also affect nesting area. Buffers around foraging areas are also warranted.
4.4.7	4-34	Mitigation BI –1; third bullet should be revised as follows: “Implement <del>intensive</del> <b>noxious</b> weed control and <b>to allow natural</b> habitat restoration in <b>non-recreational</b> areas where grazing is removed on the north shore.” Mitigation BI-3 already addresses recreational areas.
Mitigation BI-4	4-36	(2) Limiting the number of boats into the east end and Santa Cruz Bay would result in more than “minor residual impacts” due to human disturbance. We recommend that no human disturbance be allowed.
4.5.4	4-40	<b>Facilities and Services.</b> Again is missing Camp Whittier. As such, a section for Camp Whittier should be added here under the <b>Impacts Specific to....</b> section.
4.5.5	4-46	Hazard Material – should mention the chemicals required at the Water Treatment Plant.
4.6.1 Hazardous Materials	4-46	Add a third bullet to include the “Treatment chemicals for H2O plant”
4.9.3	4-56	<b>4.9.3 Impacts Common to All Alternatives</b> states that “The local managing partner will have full responsibility for implementing and funding these improvements.” This is NOT relevant to this section and is under dispute. This

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		sentence should be removed.  This section also needs to include a statement(s) regarding Camp Whittier.
4.9.5	4-59	3 <sup>rd</sup> paragraph beginning, "As described. . ." states boating would not be allowed at east end, past the narrows, Santa Cruz Bay. Needs to note that <i>kayaking would be permitted</i> under Alternate 2.
4.9.5	4-59	Last paragraph, revise following sentence to: ". . . some recreational opportunities such as hiking, bird watching, and lake cruises, which all value serene conditions. . . ."
4.9.6	4-60	<b>4.9.6 Impacts Specific to Alternative 3</b> – 3 <sup>rd</sup> bullet does not allow any motorized vehicle access on the north shore. This bullet should be revised to include an exception for Park maintenance vehicles and emergency vehicles (and perhaps one-time vehicle access for construction / placement of facilities). Sentence could read: "Motor vehicles would not be permitted on the north shore <i>other than for maintenance of emergency personnel, or one time access for construction activities</i> "
4.9.6	4-61	Last paragraph: Revise last sentence of paragraph, ". . . have minor adverse impact on foraging water bird species, lake cruise guests (up to 30 per trip), birdwatchers, and other recreationists who may have their silence interrupted."
4.9.6	4-61	Bullets regarding both RC airplanes and day use and camping to be placed on east mesa at Mohawk should be clarified as to which use takes precedence if the uses are in conflict. Parks recommendation is that day use camping take precedence.

**General Comments:** (not necessarily in order as they appear in the RMP)

- Discuss / consider that Alternate 3 should allow more on-site residents to meet substantial increase in overnight camping and new proposed uses in the plan area.
- Five year period for phase out of 2 strokes should have commencement date - e.g. from execution of an agreement with a local managing partner.
- Should description of activities at Live Oak Camp (and park) include emergency personnel use of sites for fire protection services?
- There is no statement in the RMP that says that the Bureau is mandated to provide recreational services on their land.
- Does the Bureau have any other direct agreements with lessees in plan area? If so, state in RMP.
- Temporary cabin use is not described as an existing condition.
- With respect to visitor services:
  - County Parks would benefit by working with local communities to developing a regional shuttle system that would stop at Cachuma Lake. This would help to reduce traffic and fuel emissions both on the regional level and also within the Park and would serve to enhance visitor services and experiences at the Park.

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### *Responses to Comment R-3*

#### **R-3-1**

Section 3.8.1.1 of the Final RMP/EIS has been revised to include additional information about applicable Santa Barbara County land use policies.

#### **R-3-2**

The revisions and comments made in this table have been addressed as requested, except as noted below.

In the Executive Summary and Section 1.1, the word “mandated” has not been added in the specified references to recreation; however, see Section 2.9 in regard to recreation as a primary purpose of federal water projects.

In Section 2.4.2, the text regarding other agreements affecting management of the Plan Area has been deleted, as the management agreement is not part of the RMP process or the subject of the RMP. Section 2.5.4 has been revised to state that the Santa Barbara County Capital Improvement Program would be implemented under all alternatives. The plan has not been included as an appendix to the RMP.

In Section 2.7.3, the text has been revised to state that some (not all) day use areas could be relocated from the North Plateau to the Southeast Plateau of the County Park.

Regarding the comment on Section 2.8.2, Figure 3.9-1 has not been revised because no body contact would be allowed under the Preferred Alternative (Alternative 2).

Regarding the comment on radio-controlled airplanes (Section 2.8.2.2), an RC airplane facility is not included in the Preferred Alternative; however, Mitigation BI-2 in Section 4.4.7 has been revised to require an annual use compatibility monitoring report for Alternative 3.

Discussions of native grassland have been modified in Sections 3.4.3 and 4.4.5.1. More comprehensive mapping of native grassland in the Plan Area could be undertaken as part of the vegetation management plan.

In response to the comment on Section 3.4.4.6, Mitigation BI-1 (in item 2) in Section 4.4.7 was revised to include increasing signage and public education to reduce potential for poaching.

The third recommended change to Section 4.1.7 (to add language about implementing water quality testing adjacent to suspected waste facilities) was not made because the Preferred Alternative is Alternative 2, not Alternative 3.

The first comment on Section 4.4.5.4 has been addressed in Sections 4.4.5.2 (under “Boat Use”), 4.4.6.4 (under “Camping and Recreation”), and 4.4.7 (Mitigation BI-1).

The oak tree replacement ratio proposed in the Comment on Mitigation BI-1 (Section 4.4.7) will be considered, as described in the sixth bullet of item 1. The third bullet of Mitigation BI-1



retains its original language because the Preferred Alternative would allow grazing on the North Shore to continue.

In regard to the comment on Mitigation BI-4 in Section 4.4.7, text has been added to address the concerns about impacts from allowing access to the east end of the lake and Santa Cruz Bay.

No changes were made to Section 4.9.6 because Alternative 3 was not selected as the Preferred Alternative (which is Alternative 2). For that same reason, the discussion recommended in the first General Comment was not incorporated into the description of Alternative 3.

Sections 2.7.2 and 2.8.2 have been modified to identify the beginning of the phaseout period for nonconformant marine engines, as recommended in the second General Comment.

Section 2.5.1 has been modified to address the third and fifth General Comments (regarding emergency personnel use of Live Oak Camp and lease with Camp Whittier, respectively).

New Section 2.9 discusses the legislative basis for including recreation in federal water supply projects, in response to the fourth General Comment.

A reference to temporary cabins at County Park has been added to Sections 1.1.3 and 3.9.2.7, pursuant to the sixth General Comment.

The final General Comment states that County Parks would benefit by working with local communities to develop a regional shuttle system that would stop at Cachuma Lake. 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.