May 26, 2021

El Dorado Irrigation District
Attention: Doug Venable, Environmental Review Analyst
2890 Mosquito Road
Placerville, CA 95667

Subject: El Dorado Canal Diversion Vegetation Management Project – SCH# 2021040561

Dear Mr. Venable,

The California Department of Conservation, California Geological Survey (CGS) has reviewed the Draft Initial Study and Mitigated Negative Declaration (MND) for the El Dorado Irrigation District (EID) Canal Diversion Vegetative Management Program (VMP). We offer the following comments and recommendations with respect to the proposed project's potential impacts on slope stability and soil disturbance.

Project Description:

The VMP proposes to treat vegetation on 42 acres of EID property near the El Dorado Canal adjacent to Highway 50 and the South Fork of the American River, approximately 1.5 miles southwest of the town of Kyburz in El Dorado County. Vegetation treatment around EID water conveyance infrastructure is aimed at reducing losses from and improving resiliency to, wildfires. The project objectives will be accomplished through a combination of tree and brush removal, mastication, and pruning, and will utilize an existing road network for equipment access or hand crews where steep slopes and lack of roads prohibit machinery access.

CGS Comments:

1) Section 3.7 of the Draft Initial Study and MND discusses potential impacts related to the geology and soils of the project area. Section 3.7, item c) specifically addresses the project's proximity to geologic units that are unstable or could become unstable as a result of the project and potentially cause landsliding.

   The study concludes that the project will have a less than significant impact regarding the direct or indirect cause of potentially adverse effects from landsliding. The study also concludes that the project will have no impact on geologic units or soils that are unstable or may become unstable and potentially result in landsliding.

   Following the severe winter storms of 1996-97, CGS conducted a study entitled "Landsliding Along the Highway 50 Corridor: Geology and Slope Stability of the American River Canyon Between Riverton and Strawberry, California (Wagner & Spittler, 1997). The proposed project area lies in the central portion of this study area near to where landslides of varying degrees of interpreted activity level were

identified. CGS agrees that the project activities as proposes appear to pose minimal risk of impacts to slope stability and erosion. However, for completeness, we recommend that the findings of Wagner & Spittler (1997), and other pertinent references included therein, be disclosed and discussed where appropriate in the Draft Initial Study and MND.

2) In Section 3.7 under "Setting" and in Section 5.1 under "Soils" the discussion mentions a soil series derived from acid intrusive "indigenous" rocks. Is this a typographical error intended to state "igneous" rocks?

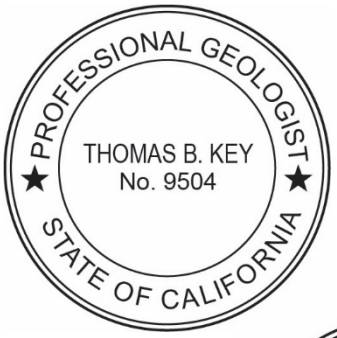
References:

Wagner, D.L., and Spittler, T.E., 1997, Landsliding Along the Highway 50 Corridor: Geology and Slope Stability of the American River Canyon Between Riverton and Strawberry, California. California Department of Conservation Division of Mines and Geology, Open File Report 97-22, 32p.

Thank you for giving us the opportunity to comment on the Draft Initial Study and MND for the El Dorado Canal Diversion VMP. If you have any questions or concerns regarding the comments in this letter, please contact Thomas Key, Engineering Geologist, at 801 K Street, MS 13-40, Sacramento, California 95814, (916) 584-4854, thomas.key@conservation.ca.gov.

Sincerely,

Original signed by:



Thomas Key, PG 9504
Engineering Geologist
Sacramento, California

Original Signed by:

Cheryl Hayhurst, CEG 2639
Senior Engineering Geologist
Sacramento, California

Electronic Submittal:

To: state.clearinghouse@opr.ca.gov
CC: OLRA@conservation.ca.gov
Subject: Draft MND Comments – El Dorado Canal Diversion VMP