



January 26, 2021

BASIC RESOURCES, INC.

Contact: Tom Ferrell
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SUBJECT: Jurisdictional Review for the Extension of Operating Hours at the Jackson Valley Quarry Located within Assessor Parcel Numbers (APNs) 005-230-016 and 005-230-007 in Amador County, California

Introduction

This report contains the findings of ELMT Consulting's (ELMT) jurisdictional review for the extension of operating hours at the Jackson Valley Quarry (project site or site) located near the City of Ione, Amador County, California. A field investigation was conducted by biologists Travis J. McGill and Jacob H. Lloyd Davies on November 24, 2020 to document previously mapped jurisdictional waters and verify that the site does not support any other jurisdictional features.

Project Location

The project site is generally located south and east of State Route 88, west of the community of Buena Vista, north of the community of Camanche Village, southwest of the City of Ione, Amador County, California. The site is depicted on the Ione quadrangle of the United States Geological Survey's (USGS) 7.5-minute map series within Section 11 of Township 5 North, Range 9 East. Specifically, the site is bound to the north by State Route 88 and to the south by Jackson Valley Road within APNs 005-230-007 and 005-230-016 at 3421 Jackson Valley Road. Refer to Exhibits 1 and 2 in Attachment A.

Project Description

In order to support regional customer demands, George Reed, Inc. (GRI) has submitted a request to modify the approved hours of operation to allow for 24-hour operational/reclamation activities. Other than the extension of operating hours, GRI seeks no change to any element of the approved operations or Permit. The Project would not modify the disturbance area, current productions levels, materials to be mined, or mining methods, and the overall production and processing activities would be consistent with existing conditions.

Methodology

Literature Review

Aerial photography was reviewed prior to conducting a field investigation in order to locate and inspect any potential natural drainage features, ponded areas, or water bodies that may fall under the jurisdiction of the United States Army Corps of Engineers (Corps), Regional Water Quality Control Board (Regional Board), or CDFW. In general, surface drainage features indicated as blue-line streams on USGS maps that

are observed or expected to exhibit evidence of flow are considered potential riparian/riverine habitat and are also subject to state and federal regulatory jurisdiction. In addition, ELMT reviewed jurisdictional waters information through examining historical aerial photographs to gain an understanding of the impact of land-use on natural drainage patterns in the area. The USFWS National Wetland Inventory (NWI) and Environmental Protection Agency (EPA) Water Program “My Waters” data layers were also reviewed to determine whether any hydrologic features and wetland areas have been documented on or within the vicinity of the project site.

Field Investigation

Following the literature review, biologists Travis J. McGill and Jacob H. Lloyd Davies conducted a field investigation to verify the results of formal delineation of wetlands and other waters of the U.S. completed by ESA (2009) and revised in 2010.

Existing Site Conditions

The proposed project site is located in an area that primarily supports agricultural land uses and rural residential homes. The site is bordered by State Route 88 on its northern boundary with undeveloped, vacant land to the immediate north and a mining quarry approximately 1 mile to the north; the site is bordered by undeveloped, vacant land, and rural residential homes beyond; and the site is bordered by agricultural lands to the south and west. The site consists of the existing Jackson Valley Quarry that is actively being mined, and the immediate surrounding undeveloped areas within the previously approved mining footprint.

On-site elevation ranges from approximately 231 to 420 feet above mean sea level and the site generally slopes from east to west. The main area of on-site topographical relief coincides with the active mining operations within the western portion of the site and areas removed from mining activities support a series of rolling hills.

Jurisdictional Areas

Based on the information provided in the in the Environmental Impact and subsequent regulatory approvals issued for the project, a total of 0.39 acre of jurisdictional features were mapped within the project site. To mitigate for impacts to these onsite jurisdictional features, George Reed, Inc. purchased 1.17 acres of floodplain mosaic wetland (seasonal wetland) credits out of the Cosumnes Floodplain Mitigation Bank. The mitigation credits were purchased on July 30, 2018 to satisfy the conditions of the regulatory approvals (refer to Attachment C).

The regulatory approvals issued for the project are currently valid and remain in effect for the project. The USACE Clean Water Act (CWA) Section 404 Nationwide Permit and the RWQCB CWA Section 401 Water Quality Certification are valid until March 18, 2022 (refer to attachment B). The CDFW Section 1602 Streambed Alteration Agreement is valid until July 27, 2022.

Site conditions remain the same, and no new jurisdictional features, beyond those previously mapped and permitted, were observed onsite during the November 24, 2020 field survey.

Conclusion

Site conditions remain the same, and no new jurisdictional features, beyond those previously mapped and permitted, were observed onsite during the November 24, 2020 field survey. Accordingly, there have been no significant changes in the biological setting at the project site, and the project is not anticipated to result in new impacts to jurisdictional waters.

Please do not hesitate to contact Tom McGill at (951) 285-6014 or tmcgill@elmtconsulting.com or Travis McGill at (909) 816-1646 or travismcgill@elmtconsulting.com should you have any questions this report.

Sincerely,



Thomas J. McGill, Ph.D.
Managing Director



Travis J. McGill
Director

- A. *Delineation of Wetlands and other Waters of the U.S. (ESA)*
- B. *Regulatory Approvals*
- C. *Agreement for Sale of Mitigation Credits*