



October 7, 2024

Chuck Beatty
Amador County
Planning Department
810 Court Street
Jackson, CA 95642-2132

Copy sent via email: planning@amadorgov.org

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)
LONE QUARRY EXPANSION PROJECT (SCH# 2021090273)
CA MINE ID# 91-03-0011

Dear Mr. Beatty:

Thank you for including the Department of Conservation's Division of Mine Reclamation (DMR) in the environmental review process for the Lone Quarry Expansion Project (Proposed Project) draft Environmental Impact Report (EIR). The EIR indicates Amador County (County), as lead agency under the California Environmental Quality Act (CEQA).

The draft EIR describes the Proposed Project, which aims to amend the existing use permit and reclamation plan (RP) for the Lone Mine (CA Mine ID# 91-03-0011). This would expand the mining area from about 56 acres to approximately 136 acres and increase the mining depth by 605 feet, allowing mining to reach 280 feet below mean sea level (MSL) instead of the current limit of 325 feet above MSL. Additionally, the total surface disturbance area for stockpiles would grow from 34 acres to around 86 acres, with a maximum elevation of 560 feet above MSL.

DMR has reviewed the subject draft EIR and provides the following comment.

Comment 1:

DMR's review of imagery available on Google Earth notes substantial changes to oak woodland habitat within the footprint of the proposed mine site expansion area between the dates of August 2018 and June 2020 (see images below). The 2024 Biological Resource Assessment (BRA) prepared by WRA Environmental Consultants, included with the EIR, describes that a biologist conducted site visits to the study area in September 2018, and April, May, and June of 2020. The BRA does not describe tree or shrub mortality, or removal within the proposed mine site expansion area.

DMR suggests that the historical surveys for previous environmental documents be reviewed and considered along with the 2024 BRA for this proposed project, and that baseline data (Pursuant to California Code of Regulations (CCR) Section 3705(m)) be collected from nearby reference areas of undisturbed oak woodland, if appropriate. This data will provide a more accurate representation of the site's pre-disturbance

conditions. Additionally, DMR recommends enhanced restoration measures and increased replacement ratios to effectively address oak woodland habitat if species removal occurred prior to the 2024 BRA surveys.

SMARA Citations

Performance Standards for Revegetation CCR Section 3705(m):

"Success of revegetation shall be judged based upon the effectiveness of the vegetation for the approved end use, and by comparing the quantified measures of vegetative cover, density, and species-richness of the reclaimed mined-lands to similar parameters of naturally occurring vegetation in the area. Either baseline data or data from nearby reference areas may be used as the standard for comparison. Quantitative standards for success and the location(s) of the reference area(s) shall be set forth in the approved reclamation plan. Comparisons shall be made until performance standards are met provided that, during the last two years, there has been no human intervention, including, for example, irrigation, fertilization, or weeding. Standards for success shall be based on expected local recovery rates. Valid sampling techniques for measuring success shall be specified in the approved reclamation plan. Sample sizes must be sufficient to produce at least an 80 percent confidence level. There are standard statistical methods in commonly available literature for determining an 80 percent confidence level on a site-by-site basis. Examples of such literature include, but are not limited to, D. Mueller-Dombois and H. Ellenberg, 1974, "Aims and Methods of Vegetation Ecology", John Wiley and Sons, Inc., or C. D. Bonham, 1988, "Measurements for Terrestrial Vegetation", John Wiley and Sons, Inc., and are available at many university libraries. The texts are also available at some local libraries through the Inter-Library Loan Program."



1 Google Earth image dated August 16, 2018



2 Google Earth Image dated June 16, 2020

DMR requests to be included on the distribution list for this Proposed Project. Additionally, the DMR requests that any subsequent project documents as well as a copy of the certified final EIR, be sent to the DMR at DMR-Submittals@conservation.ca.gov or the mailing address on the bottom of page 1 of this letter. If you have any questions, please contact me at (916) 616-1558.

Sincerely,

DocuSigned by:
Amy Gomes
C64262A45B474A8...

Amy M. Gomes
Environmental Scientist
SMARA Technical Unit

cc: State Clearinghouse, state.clearinghouse@opr.ca.gov

Department of Conservation, Office of Legislative and Regulatory Affairs,
OLRA@conservation.ca.gov