

Public Scoping Report
(Summary of September 2019 and February 2021 Scoping)

Crystal Creek Aggregate Expansion Project

Use Permit 19-0007
Reclamation Plan 19-0001

SCH No. 2019090702



March 2021



Department of Resource Management-Planning Division

PUBLIC SCOPING REPORT

(Summary of September 2019 and February 2021 Scoping)

CRYSTAL CREEK AGGREGATE, INC.

Use Permit Amendment (UP-19-0007)
Reclamation Plan Amendment (RP-19-0001)
State Clearinghouse No. 2019090702

Lead Agency:



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March 2021

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Abbreviations and Acronyms

AB	Assembly Bill
BLM	Bureau of Land Management
CA	California
Caltrans	California Department of Transportation
CCA	Crystal Creek Aggregates, Inc.
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
County	Shasta County
CVRWQCB	Central Valley Regional Water Quality Control Board
DOI	United States Department of Interior
EIR	Environmental Impact Report
GPA	General Plan Amendment
MND	Mitigated Negative Declaration
mph	Miles Per Hour
MR	Mineral Resource (Land Use and Zoning Classification)
NAHC	Native American Heritage Commission
N-O	Natural Resource Protection-Open Space (Land Use Classification)
NOC	Notice of Completion
NOP	Notice of Preparation
PNA	Polynuclear Aromatic Hydrocarbons
PRC	Public Resources Code
RP	Reclamation Plan
SCH	State Clearinghouse
SCSD	Shasta Community Services District
SHN	SHN Consulting Engineers and Geologists
SR	State Route
U	Unclassified (Land Use Classification)
UP	Use Permit
ZA	Zone Amendment

Section 1.0 – Introduction

The environmental review of the Crystal Creek Aggregate Use Permit and Reclamation Plan Amendments (Use Permit [UP] 19-0007, Reclamation Plan [RP] 19-0001) (State Clearinghouse [SCH] No. 2019090702) (herein referenced as the proposed project) is being conducted by the Shasta County Resource Management Department (County) and therefore is regulated by the California Environmental Quality Act (CEQA) under California law. The intent of the public scoping process under CEQA is to initiate the public scoping for the Environmental Impact Report (EIR), provide information about the proposed project, and solicit information that will be helpful in the environmental review process. As part of the review process, the County will prepare an EIR, which will evaluate the potential environmental impacts associated with the proposed project and will identify mitigation measures to reduce these impacts, where possible.

The public scoping report for the proposed Crystal Creek Aggregate Use Permit and Reclamation Plan Amendments documents the issues and concerns expressed by members of the public, government agencies, and organizations during the previous September 2019 – November 2019 EIR public scoping period and the 2021 scoping period (February 2021 – March 2021). The release of the Notice of Preparation (NOP) to prepare an EIR on February 19, 2021 initiated the County’s 30-day public scoping period under CEQA. The comment period allowed the public and regulatory agencies an opportunity to comment on the scope and content of the environmental document, including the alternatives to be considered, and issues that should be addressed in the EIR.

This report is intended for use by the County in preparing the EIR as formal documentation of initial input received from governmental agencies, Tribes, and members of the public regarding the range of actions, alternatives, mitigation measures, and potential significant effects to be analyzed in depth in the EIR. It also provides access for other agencies and members of the public to see the comments received during the scoping period.

1.1 Scoping Report Organization

This scoping report includes four main sections and appendices, as described below:

- **Section 1.0** provides an introduction to the report and describes the purpose of scoping and a brief overview of the Crystal Creek Aggregate Use Permit and Reclamation Plan Amendments.
- **Section 2.0** provides information on the scoping meeting and notification materials, including the NOP.
- **Section 3.0** summarizes the comments received and highlights the key issues raised during the scoping comment period.
- **Section 4.0** describes the next steps in the EIR process.
- **Section 5.0** contains appendices of this report, including the NOP, handouts and informational materials, and a copy of all comments received.

Appendices consist of all the supporting materials utilized by the County during the scoping process. These appendices include copies of the NOP and meeting materials provided at the public scoping meeting. They also include copies of the scoping comment letters received during the 2019 and 2021 NOP public comment periods.

1.2 Purpose of an Environmental Impact Report

CEQA requires the preparation of an EIR prior to approving any project that may have a significant effect on the environment. For the purposes of CEQA, the term “project” refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (State CEQA Guidelines Section 15378[a]). Pursuant to CEQA’s definition, the County has determined that the proposed Crystal Creek Aggregate Use Permit and Reclamation Plan Amendments is a “project,” which has the potential for resulting in significant environmental effects. The purpose of the EIR is to review the existing conditions, analyze potential environmental impacts, and identify feasible mitigation measures to reduce potentially significant effects related to the proposed project.

An EIR is a public information document used in the planning and decision-making process. This project-level EIR analyzes the environmental impacts of the project. The Shasta County Planning Commission and Board of Supervisors will consider the information in the EIR, including the public comments and staff response to those comments, during the public hearing process. As a legislative action, the final decision is made by the Board of Supervisors, who may approve, conditionally approve, or deny the project. As provided in State CEQA Guidelines Section 15021, public agencies are charged with the duty to avoid or minimize environmental damage where feasible. The public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social issues. The purpose of an EIR is to identify:

- The significant impacts of the project on the environment and indicate the manner in which those significant impacts can be avoided or mitigated;
- Any unavoidable adverse impacts that cannot be mitigated; and
- Reasonable and feasible alternatives to the project that would eliminate any significant environmental impacts or reduce the impacts to a less than significant level.

The EIR will also discuss and evaluate a range of project alternatives, potential growth-inducing impacts, impacts found not to be significant and cumulative impacts of the project.

CEQA requires an EIR to reflect the independent judgment of the lead agency with respect to impacts, disclose the level of significance of the impacts both with and without mitigation, and describe the mitigation measures proposed to reduce the impacts. A Draft EIR is circulated to responsible agencies, trustee agencies with resources affected by the project, and interested agencies and individuals. The review process gives both agencies and individuals an opportunity to share expertise, discuss agency analyses, check for accuracy, detect omissions, discover public concerns, and solicit mitigation measures and alternatives capable of avoiding or reducing the significant effects of the project, while still attaining most of the basic objectives of the project.

Reviewers of the forthcoming Draft EIR for the proposed Crystal Creek Aggregate Use Permit and Reclamation Plan Amendments are requested to focus on the sufficiency of the document (i.e., the thoroughness of its identification and analysis of possible impacts on the environment as well as ways to avoid or mitigate such impacts). Comments are most helpful when they suggest better ways to avoid or mitigate significant environmental effects (e.g., through additional alternatives or mitigation measures).

1.3 Purpose of Scoping

The process of determining the focus and content of the EIR is known as scoping. Scoping helps to identify the range of actions, alternatives, environmental effects, and mitigation measures to be analyzed in depth, and eliminates from detailed study those issues that are not pertinent to the final decision on the proposed project. The scoping process is not intended to resolve differences of opinion regarding the proposed project or evaluate its merits. Instead, the process allows all interested parties to express their concerns regarding the proposed project and thereby ensures that all opinions and comments applicable to the environmental analysis are addressed in the EIR. Scoping is an effective way to bring together and address the concerns of the public, affected agencies, and other interested parties. Members of the public, relevant federal, State, regional and local agencies, interests groups, community organizations, and other interested parties may participate in the scoping process by providing comments or recommendations regarding issues to be investigated in the EIR.

Comments received during the scoping process are part of the public record as documented in this public scoping report. The comments and questions received during the public scoping process have been reviewed and considered by the County in determining the appropriate scope of issues to be addressed in the EIR. The purpose of the scoping for the Crystal Creek Aggregate Use Permit and Reclamation Plan Amendments project was to:

- Inform the public and relevant public agencies about the proposed project, CEQA requirements, and the environmental impact analysis process;
- Identify potentially significant environmental impacts for consideration in the EIR;
- Identify possible mitigation measures for consideration in the EIR;
- Identify potential alternatives to the proposed project for evaluation in the EIR; and
- Compile a mailing list of public agencies and individuals interested in future public hearings and notices.

1.4 Summary of the Proposed Project

The existing Crystal Creek Aggregate, Inc. (CCA) quarry is located in the community of Keswick, on the west side of Iron Mountain Road, approximately 1.5 miles north of the Intersection of Iron Mountain Road and State Route (SR) 299 West, and directly across from the intersection of Iron Mountain Road and Laurie Ann Lane (10936 Iron Mountain Road).

CCA was originally permitted in 1990 under Shasta County Use Permit UP-24-90 and Reclamation Plan 1-90. Subsequently in 2008 the following entitlements were approved; General Plan Amendment 07-005, Zone Amendment 07-020, Use Permit Amendment, UP-07-020, and Reclamation Plan Amendment RP-07-022. A Mitigated Negative Declaration (MND) with findings as specifically set forth in Planning Commission Resolution Nos. 2008-066 and 2008-067 was also adopted to approve the various entitlements.

2019 Project Application

In September 2019 CCA submitted an application requesting to expand their existing aggregate mining operation and add an asphalt batch plant. The project would expand an approved mining use permit area of 110.24 acres and an approved reclamation plan area of 108.87 acres to 179.97 acres. The project originally requested a General Plan amendment from Natural Resource Protection-Open Space (N-O) to

Mineral Resource (MR), and a Zoning Plan amendment from Unclassified (U) to Mineral Resource (MR). The following summarizes the 2019 requested actions:

- General Plan Amendment of 28.46 acres from Open Space (N-O) to Mineral Resource (MR) so that Zone Amendment could be processed for approval of an area that would allow for expansion of the proposed project.
- Zone Amendment of 28.46 acres from Unclassified (U) to Mineral Resource (MR) necessary to be consistent with the General Plan Amendment and to allow the processing of a use permit allowing operational expansion.
- Amend Use Permit UP 07-20 to expand the mining area by 69.73 acres from 110.24 to 179.97 acres, expand hours of operation, increase yearly blasting maximums, modify quarry bench heights and widths, and to pert the installation and operation of a hot mix asphalt batch plant.
- Amend Reclamation Plan RP 07-022 to expand the Reclamation Plan area by 71.10 acres from 108.87 to 179.97 acres and to extend the estimated life of the mining operation by 150 years to year 2169.

2021 Project Application

The project applicant currently proposes an overall project area of approximately 179.97 acres within which the existing approved Use Permit and Reclamation Plan Areas of 110.69 acres will be maintained but modified to increase the amount of aggregate to be mined. The use permit area is proposed to be expanded by an additional 69.28 acres referenced as the remaining Mineral Resource Area (MR) to serve to buffer lands to the south, west, and north from noise, light, and other mining related activities.

The total amount of aggregate to be processed yearly is proposed to increase from 250,000 to 500,000 tons and the total estimated amount proposed to be mined will increase from 15.92 million tons to 25.4 million tons over a period of three phases with an estimated life of the phases varying from 14 to 35 years. The estimated life of the mining operation will increase from the currently approved end of Year 2072 by 27 years to end of Year 2099. Also proposed is a portable propane powered drum mix asphalt plant. The plant could utilize up to 200,000 tons of the 500,000 tons of aggregate processed yearly for the production of asphalt.

No additional structures or operations other than those associated with the asphalt plant are proposed. The locations of the existing scales and office, rock crushing, screen and washing operational, primary, and secondary entrances/exits, diesel fuel storage tanks, waste oil tank, two motor oil and one lubricating oil tank, and five settling and two recycle ponds will remain. The existing Concrete Recycle Area location and operation for which an administrative permit was issued and subsequently reissued by the County due to the Carr Fire is proposed as a project component. The location of the material and topsoil stockpiles will also remain in their current general location which will expand and contract as part of the mining operation. The number of full-time employees will increase from eight to 14 with one part-time employee. All existing and proposed uses are allowed under the existing General Plan Land Use Classifications and Zoning District Designations.

Amending Use Permit UP-07-020 will modify the design of the existing mining area or quarry of approximately 57.31 acres and the plant area of approximately 53.38 acres which together total 110.69 acres that will be maintained as the Reclamation Plan Area with associated boundaries. However, the amount of aggregate mined, as noted, will be increased as will the hours of operation, particularly with

respect to the asphalt plant (24 hours per day generally Sunday evenings through Friday afternoons), and yearly blasting maximums (24 instead of 12). The average height of the highwalls will increase from 22 feet to 40 feet, except for one highwall at 44 feet. Benches will also be increased in width from 30 feet to 40 feet, except for the bench along the perimeter of the pond which will be increased to 60 feet in width. The pond surface area will increase from 23.49 acres to 32.67 acres.

Project Comparison (2019 vs 2021)

Crystal Creek Aggregate – Project Submission Comparison		
Project Characteristic	09/30/2019 NOP	02/19/2021 NOP
Project Area	179.97 Ac	179.97 Ac
Use Permit Area	179.97 Ac	179.97 Ac
<i>Mining (Quarry) Area</i>	102.25 Ac	57.31 Ac
<i>Plant Site & Stockpiles</i>	46.83 Ac	53.38 Ac
<i>Other Lands*</i>	30.89 Ac	-
<i>Remaining Mineral Resource Area*</i>	-	69.28 Ac
Reclamation Plan Area	179.97 Ac	110.69 Ac
General Plan Amendment		
<i>N-O to MR</i>	28.46 Ac	N/A
Rezoning		
<i>U to MR</i>	28.46 Ac	N/A
Total Aggregate to be Mined		
<i>Million Cubic Yards</i>	37.29	12.7
<i>Million Tons</i>	74.58	25.4
Annual Aggregate to be Mined		
<i>Million Cubic Yards</i>	450,000	250,000
<i>Million Tons</i>	900,000 Tons	500,000 Tons
Mining Phases	11	3
Mining Termination Date	06/15/2169	12/31/2099
Years of Operation	150	79
Blasting Days Per Year	40	24
Daily Truck Trips	1,912	1,062
<i>AM Peak Truck Trips</i>	221	123
<i>PM Peak Trips</i>	111	62
Mining Area Wildlife Escape Routes	No	Yes
All Native Species Revegetation	No	Yes
Pond #6 Area		
<i>Area</i>	66.85 Ac	32.67 Ac
<i>Depth</i>	100 Ft	60 Ft
<i>Pond Bench Width</i>	36 Ft	44 Ft
<i>Meandering Drainage Course</i>	No	Yes
<i>Depth</i>	100 Ft	60 Ft

* Area around the northern, western & southern areas of the mining area. Referenced as "Other Lands" in the 09/30/2019 NOP Project Description.

Section 2.0 – Project Scoping

This section describes the methods used by the County to notify the public and agencies about the scoping process conducted for the proposed project. It outlines how information was made available for public and agency review and identifies the different avenues that were and are available for providing comments on the project (i.e., meetings, fax, email, mail, and phone).

2.1 Notice of Preparation

As required by State CEQA Guidelines Section 15082, the County issued a Notice of Preparation (NOP) on September 30, 2019 that summarized the proposed project, stated its intention to prepare an EIR, and requested comments from interested parties (refer to Appendix 5.1, 2019 NOTICE OF PREPARATION). The NOP was filed with the State Clearinghouse on September 30, 2019 (SCH No. 2019090702), which initiated the 30-day public scoping period. The NOP response period was extended for seven (7) days and ended on Friday, November 8, 2019. Nineteen (19) copies of the NOP were distributed to federal, State, regional, and local agencies. The purpose of the NOP was to formally announce that the County is preparing a Draft EIR for the proposed project, and that, as Lead Agency, was soliciting input regarding the scope and content of the environmental information to be included in the EIR. Applicable agencies and interested members of the public have 30 days to respond to the NOP, indicating, at a minimum, reasonable alternatives and mitigation measures they wish to have explored in the Draft EIR, and whether the agency will be a responsible agency or a trustee agency for the project.

Based on project revisions that occurred since the 2019 NOP, an Initial Study and NOP was circulated for an additional 30-day comment period between February 19, 2021 and March 22, 2021 (refer to Appendix 5.5, 2021 INITIAL STUDY AND NOTICE OF PREPARATION).

The 2021 Initial Study and NOP and all future proposed project-related documents are available for review at the information repository sites listed in Table 2-1, REPOSITORY SITES. The Draft EIR and technical appendices, once released for public review, will also be available for inspection at the Shasta County Library branches noted below in Table 2-1.

**Table 2-1
REPOSITORY SITES**

Repository Site	Location	Phone Number	Hours of Operation
Shasta County Department of Resource Management	1855 Placer Street, Suite 103 Redding, CA 96001	(530) 225-5532	Monday – Friday 8:00 am – 5:00 pm
Shasta County Library	1100 Parkview Avenue Redding, CA 96001	(530) 245-7250	Monday – Thursday 10:00 am – 8:00 pm Friday – Saturday 10:00 am – 6:00 pm Sunday 1:00 pm – 5:00 pm
Shasta County Library – Anderson Branch	3200 West Center Street Anderson, CA	(530) 365-7685	Tuesday – Friday 9:00 am – 6:00 pm Saturday 10:00 am – 2:00 pm Sunday – Monday Closed
Shasta County Website	https://www.co.shasta.ca.us/index/drm_index/planning_index/eirs/crystal-creek-aggregate		
Note: Repository sites noted above will also contain the forthcoming Draft EIR and supporting technical appendices.			

2.2 Public Noticing

The County uses a standard 300 foot buffer to generate notification mailing lists for all discretionary projects. Due to the size of the project parcel, the buffer was extended to include all immediately surrounding properties. In addition, the 2021 distribution list includes members of the public who requested future notifications during the scoping period for the original project in 2019.

The County strives to notify all interested parties of discretionary projects. In this effort, and in addition to the notices that were delivered by mail to surrounding property owners, the “REVISED NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT (EIR); NOTICE OF 30-DAY EIR SCOPING PERIOD AND REQUEST FOR WRITTEN SCOPING COMMENTS; AND NOTICE OF PUBLIC SCOPING MEETING REGARDING THE CRYSTAL CREEK AGGREGATE EXPANSION PROJECT” was sent to the Record Searchlight, and is posted on the Resource Management website along with the Initial Study pursuant to State CEQA Guidelines for early public consultation Section 15083. In addition, the NOP was posted with the County Clerk, and on the Office of Planning and Research State Clearing house website, as required pursuant to the State CEQA Guidelines Section 15082.

2.3 Public Scoping Meetings

November 2019 Scoping Meeting

The County held a public scoping meeting on Friday, November 1, 2019 in the Public Works Conference Room at the Department of Resource Management that provided an opportunity for members of the public and government agencies to obtain more information on the proposed project and to ask questions regarding the proposed project, and to provide formal scoping comments. In addition, the scoping meeting served as an opportunity for attendees to provide guidance as to the scope and content of the EIR, including potential environmental impacts of concern and mitigation measures or alternatives that should be addressed. The merits of the project were not discussed at this meeting, nor were comments regarding approval or denial of the project.

The notice for the meeting was mailed agencies that received a copy of the NOP and to surrounding property owners, including parcels the front Iron Mountain Road (generally from the existing mine to SR-299). The notice of the public scoping meeting was also posted on the County’s website. The scoping meeting was held between 9:00 a.m. and 10:30 a.m. Seven (7) members of the public attended the meeting. Handouts and informational materials made available at the scoping meeting are listed below (refer to Appendix 5.2, SCOPING MEETING MATERIALS).

- Sign-In Sheet
- Notice of Preparation
- Comment Cards

March 2021 Scoping Meeting

The County held a second public scoping meeting for agencies and individuals to learn more about the 2021 revised project application, and to receive comments regarding the appropriate scope and content of the EIR including what potential environmental impacts of the project should be addressed in depth. The meeting was held Tuesday, March 9, 2021 at 9:00 a.m. Due to the COVID-19 public health emergency, the meeting was held virtually, in order to help protect the health and safety of participants and staff.

Approximately 23 members of the public participated in the online meeting. A copy of the presentation is provided in Appendix 5.6, 2021 SCOPING MEETING PRESENTATION).

2.4 Tribal Consultation Pursuant to AB 52

Pursuant to the Assembly Bill (AB) 52 Tribal consultation process, CEQA lead agencies consult with tribes that are traditionally and culturally affiliated with the project area and that have requested consultation pursuant to Public Resources Code (PRC) Section 21080.3.1. The purpose of the consultation is to determine whether a proposed project may result in a significant impact to tribal cultural resources that may be undocumented or known only to the tribe and its members. As set forth in PRC Section 21080.3.1(b), the law requires:

Prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation.

The County's AB 52 contact list consists of Native American tribes that had submitted written requests for notification of CEQA projects within their geographic area of traditional and cultural affiliation as of October 7, 2019, when the County initiated consultation. The County sent a letter by certified mail on October 7, 2019 to the Wintu Tribe of Northern California and Toyon-Wintu Center. Return receipts for the certified letters indicate the letters were delivered on October 7, 2019. The County received no response to the letter.

Section 3.0 – Scoping Comments

This section summarizes the comments raised by the public and agencies during the scoping process for the Crystal Creek Aggregate Use Permit and Reclamation Plan Amendments EIR. This summary is based upon both written and oral comments that were received during the 2019 NOP public review period that circulated from September 30, 2019 through November 8, 2019 and the 2021 NOP review period (February 19, 2021 – March 22, 2021). All written and oral comments received during the public comment period for the NOP were reviewed for this report, including comments received during the public scoping meeting, and those comments submitted via email. Section 3.3, below, discusses the key issues that were raised during the scoping process.

3.1 2019 Scoping

A total of twelve (12) comment letters were received during the scoping process, and seven (7) individuals provided oral comments during the November 1, 2019 scoping meeting. Five (5) government agencies and seven (7) members of the public submitted written comments. Appendix 5.3, COMMENT LETTERS RECEIVED IN RESPONSE TO THE 2019 NOP, contains all comment letters from government agencies, private organizations, and members of the public received during the scoping period in their original format as submitted by the commenter.

Government Agencies

California Department of Fish and Wildlife – October 29, 2019
California Department of Transportation – November 1, 2019 (email)
Central Valley Regional Water Quality Control Board – October 29, 2019
Native American Heritage Commission – October 29, 2019
United States Department of the Interior, Bureau of Land Management – October 29, 2019 (email)

Members of the Public

Kristy Ortega
Sandi Shearer
Robert Richardson
John Deaton
Kurt and Nydia Schuhmeier
Darcy and Ted Goldsmith
Marci Fernandes

3.2 2021 Scoping

One hundred sixty-six (166) members of the public, government agencies, and other organizations provided written comments during the 2021 scoping process. Eighteen (18) individuals provided oral comments during the March 9, 2021 scoping meeting. Appendix 5.7, COMMENT LETTERS RECEIVED IN RESPONSE TO THE 2021 NOP, contains all comment letters from government agencies, private organizations, and members of the public received during the scoping period in their original format as submitted by the commenter. Protest petitions totaling 481 signatures were received.

Members of the Public

Alan and Joanne Brady	Jim F. Milestone	Michael Schlosser
Alan Foster	John Deaton	Mike Anderson
Alan Ernesto Phillips	Jeannine Gillan and David Vaughn	Moira Casey
Alya Tucker	Jim and Carol Cowee	Monica Cerimele
Antoinette C. Perkins	Jim and Donna Dowling	Muffy Berryhill
Beverly Simone	Jeffrey Stephens	Nancy Pernel
Bob and Diane Madgic	Jennifer Gibson	Pat Bunnell
Bob Madison	Jennifer Phelps	Patricia Davis
Bruce and Teresa Muller	Jessica Wilder	Patricia Soares
Bruce Webb	John Springer	Patrick and LouAnn Graham
Catherine Jackson	Joseph and Amanda Rowett	Paul Hughes
Celeste White	Josh Hoines	Rachel and David Tate
Chelsea Dwinell	Joy Newcom-Wade, RN, FNP	Randy Compton
Cheri Watt	Judy McKay-Lifquist	Rebecca Cileo
Cheryl McKinley	Judy Smith	Rex and Laurie Farley
Chris and Billie Harvey	Karin Lilienbecker	Richard Hardie
Chris Rodriguez	Kate Jewett	Richard Robinson
Christian Gardinier	Kathryn Gray	Robert Gordon
Christina Conte	Kathryn Henderson	Ronald Reece
Christopher A. Gray	Kathryn McDonald	Roy Berlinghoff
Crystal Stewart	Kathryn A. Williams	Russ Wade
Dan Bernet	Kathy Grissom	Sandi Wardall
Dana Silberstein	Kit Harvey	Sandy Babcock, RN
Darlene Cornett	Kristy Ortega	Sandy Harrison, RN
David Zoll	Kurt Schuhmeier	Shastamermaid819@gmail.com
Dean Holden	Lang Dayton, MD	Sherry Gifford
Diane Bell-Gardinier	Larry Jordan	Stacey Gotham
Diane Dobbins	Laura Christman Manuel	Stella Prudhomme and Walt Tausch
Diane Turner	Laurie O'Connell	Steph Velasquez
Don Barich	Laurie Phillips	Stephen Hofkin, MD
Doug Mandel	Leanne Berlinghoff	Stephen E. Williams
E. Judge	Linda Miller	Steve and Kathy Callan
Elizabeth Jorde	Linda Mitchell	Steve Williams
Ellen Sugg	Linda Samuels	Sue Taylor
Ellen Sweeney	Lori Bridgeford	Susan Bradfield
Emily Celeste White	Lynn E. Fritz	Susan Kirmayer
Emma Peel	Lyra Gray	Susan Taylor
Eric and Sally Ohde	Lynne Wonacott	Susan Tescher
Francesca Huntsman-Siemer	Maja K Sandberg, MD	Tamra Plaga-Heagney
Frank D. Treadway	Marci Fernandez	Terry Healey
Gary Steddom	Margaret Jensen	T.M. Arnett
Gayleen Gorder	Marion and Carole Schmitz	Trevor Towne
Jack Baker	Mark D. Twitchell	Tom and Jen McCloskey
Jacklyn Castellanos	Mark Endraske	Tom Mac Phee
Jan McEwen	Mark Jusino	Tom Morehouse
James Pernel	Mark W. Hansen	Tom Thomas, MD
Jane Elmore	Mary Kaufman	Tyler Martin
Janet Landles	Mary Speigle	Victoria Bernet
Janice Hunter	Mary Ann McCrary	Virginia Phelps
Jbell429@outlook.com	Marilyn Miller	Vivi-Anne and Tim Thompson
Jeannette Logue	Melinda Brown	
Jim Dowling	Michael Berg	

Government Agencies

California Department of Conservation Division of Mine Reclamation – March 15, 2021
Central Valley Regional Water Quality Control Board – March 17, 2021
City of Anderson – February 23, 2021 (email)
City of Redding – March 2, 2021 (email)
Native American Heritage Commission – February 22, 2021
Shasta County Air Quality Management District – March 16, 2021
United States Department of the Interior, Bureau of Land Management – March 23, 2021

Other Organizations

North State Climate Action – Mary Ann McCrary
Shasta Environmental Alliance – David Ledger
Shasta Wheelmen, Inc. – Doug Holt, President
Stream And Greenways Alliance – Mike Jones, President
Whole Earth and Watershed Festival, Peggy Rebol, Executive Director

Protest Petition

481 signatures

Media Information Requests

KRCR-TV – Mike Mangas
Redding Record Searchlight – Damon Arthur

3.3 Issues and Concerns Raised During the 2019 and 2021 Comment Periods

As discussed above, written, and oral comments and suggestions were provided by members of the public, organizations, and government agencies. The discussion below presents a broad summary of key issues identified from the written and oral comments received on the proposed project during the scoping period.

In general, the summary comments noted below have been, in large part, paraphrased with a focus on key issues of concern, questions and general comments/suggestions. Where one or more comments address a similar issue or concern, those comments were combined together and summarized to minimize redundancy. The specific issues raised during the public scoping process are summarized below according to topic. Appendix 5.7, COMMENT LETTERS RECEIVED IN RESPONSE TO THE 2021 NOP, contains all comment letters from government agencies, private organizations, and members of the public received during the scoping period in their original format as submitted by the commenter.

Aesthetics, Light & Glare

- Concerns related to light and glare impacts associated with the proposed asphalt plant.
- Headlight trespass associated with nighttime truck traffic.
- Concerns related to the overall visual impacts of the proposed expansion.
- What will the increased light pollution be?
- Will there be more flood lights added to their property?

Air Quality, Odors & Health Risks

- Concerns were raised regarding the proposed location and overall operation of the asphalt plant. It was recommended that the asphalt plant utilize the latest best available technology to control odors.
- Wind patterns will impact the entire community of Keswick and the surrounding area with odors associated with the asphalt process.

- Westerly wind patterns blow consistently in late spring, summer, and early fall when the temperatures are warmer. This will exacerbate the spreading of particulate matter and sound from this 24-hour operation.
- Questions were raised regarding the methodology for modeling air quality and odor emissions.
- Fugitive dust control during mining operations.
- What are the possible forms of cancer that may result from living near an asphalt plant?
- What impact would the toxic fumes have on air quality for the elementary school students that go to school three miles (south west) away in Shasta?
- What are the possible birth defects that an unborn child could develop due to living in close proximity to an asphalt plant?
- What impact will an asphalt plant have on the air quality for sensitive groups living nearby?
- What impact will any increased mining/blasting have on the air quality? For sensitive groups, will this further impact air quality for them? What are the negative impacts to health for sensitive groups living in the area? Sensitive groups include the elderly, immunocompromised, babies, those living with existing respiratory issues like asthma, and those with allergies to dust and fumes.
- How significant could the odor of an asphalt plant be for those living in the vicinity? Will this odor trigger allergies or asthma?
- What neurological problems can result from living near an asphalt batch plant? For a developing fetus? For a small child?
- Is there an increased risk of brain illness and dementia as a result of exposure to the chemicals in this production?
- Is there an increased risk of cancer?
- Is there an increased risk of respiratory illness?
- What will be the effect on humans from the released pollutants from the asphalt plant?
- Will the increased dust lead to an increased cost for homeowners to have to more frequently change filters in AC and heating units?
- Odors could stop the rebuilding of the Keswick Community.
- Adding an asphalt production plant will expose our rivers, environment, local schools, drinking water and families to sulfur dioxide, arsenic, benzene, formaldehyde, cadmium, hexane, phenol, toluene, lead, mercury, volatile organic compounds, polycyclic aromatic hydrocarbons, and fine particulates. These are known causes of cancer, lung disease, liver damage, central nervous system disorders, high blood pressure, sinus problems, headaches, dizziness, and nausea.
- Question regarding emission data being self-reported in regard to the current operations and the planned addition of an asphalt plant.
- Impacts to Shasta Elementary school.

Biological Resources

- Middle Creek Watershed is considered Central Valley Steelhead Critical Habitat that will be impacted from sediment not captured by the settling ponds.
- Bright flights disrupting the behavioral patterns of birds, insects, and frogs.
- What impact will this have on the returning wildlife in the Carr Fire burn area?
- What impact will the development of this plant, and the fumes have on future vegetation recovery in the Carr Fire burn scar area?
- How might this adversely affect the vegetation that did survive the Carr Fire, near the proposed operations?
- Impacts to streams and drainages that feed into the Sacramento River.

- Impacts to Salmon and Steehead in Middle Creek.
- Will any living vegetation need to be removed?
- What impact could this have on the air quality for vegetation with regards to pollinators? Could this be harmful for bees in the area? To other native pollinators?
- What will the released pollutants do to the vegetation, including locally grown nearby gardens that homeowners grow for their own food?
- What will the effect of those released pollutants be on the fish, reptiles, amphibians, mammals, and birds that live in the area?
- Spread of non-native invasive species.
- Also, see October 29, 2019 letter submitted by the California Department of Fish and Wildlife (CDFW).

Cultural Resources

- Concerns related to impacting known and unknown cultural resources.
- Cultural and spiritual value of salmon in Middle Creek.
- The importance of coordinating with the Tribes was highlighted.
- Concerns related to impacts to the adjacent Phu-Rus-Tapi-Wintu Resting Place.
- Given that there is a federal treaty with the Wintu tribe regarding fishing rights at the mouth of Middle Creek, shouldn't NEPA and the Army Corps of Engineers be involved in assessing this proposal?

Hazards & Hazardous Materials

- Concerns regarding the safe storage of onsite hazardous materials and explosives and the need to ensure that no environmental impacts (to humans and wildlife) would occur based on the long-term storage and use of such materials onsite.
- Concerns regarding exploding propane tanks associated with the asphalt plant.
- What chemicals could be expected to end up Middle Creek, Rock Creek, and then in the Sacramento River from this operation?
- Will Pollutants such as Benzene, formaldehyde, Arsenic, bitumen, Polynuclear Aromatic Hydrocarbons (PNAs) and other toxic cancer causing carcinogens will leach into the nearby creeks and the Sacramento River? Will it leach into the water table?
- What are the long-term impacts when the mine is closed?
- Will trucks carry toxic, flammable, and dangerous substances such as toluene and benzene through residential areas?

Hydrology & Water Quality

- Is the current size of the settling ponds large enough to accommodate the higher amount of dust entering into the ponds?
- Truck traffic tracking dust and dirt offsite and impacting adjacent waterways.
- Surface water impacts to Middle Creek. Concerns were raised of increased onsite erosion due to the Carr Fire as several small onsite tributaries carry surface flows to Middle Creek.
- Long-term groundwater impacts related to blasting and excavation activities.
- Concerns regarding blasting to result in long-term groundwater impacts. Do not repeat Iron Mountain Mine.

- Evaluate the anticipated water quality of the mine pit lake so appropriate water management protocols can be designed and implemented.
- What toxins can be expected to leach into the soil and into the underground water?
- Impacts to nearby groundwater wells and surface water features.
- Residents have noted that CCA containment ponds overflow regularly during times of heavy rain.
- Also, see October 29, 2019 and March 17, 2021 letters submitted by the Central Valley Regional Water Quality Control Board (CVRWQCB).

Land Use & Planning

- Asphalt plant in the middle of a residential area is not the best land use.
- The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise & Vibration

- Noise pollution causing adverse effects such as anxiety, stress, nervousness, nausea, headache, emotional instability, argumentativeness, sexual impotence, changes in mood, increase in social conflicts, neurosis, hysteria, and psychosis. Increased use of heavy equipment onsite and no vegetation to attenuate the increased noise and dust from more trucks coming and going to the site.
- The current quarry and adjacent lumberyard operations generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work weeks, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest.
- The analysis should address the impacts of blasting vibrations on adjacent properties, including foundations.
- What will the increased noise pollution be? Will there be added noise on the weekends? Will there be added noise in the evenings?
- General concerns regarding blasting being more intense when compared to existing operations.
- The existing baseline noise should consider that fact that much of intervening trees were destroyed by the Carr Fire resulting in the removal of natural noise barriers.
- Additional noise from trucks, both from braking and using engine brakes as well as increased noise from the engines to pull heavily loaded trucks up hill.
- The community is concerned that a new asphalt plant operating night would produce more than 67 decibels and have an increase of 12 dB or more compared to the current nighttime noise level.

Recreation

- Five trails, including the main River trail are located within a mile from the asphalt plant and will be affected by the plant emissions and truck traffic.
- Fishing on the river and the entire Swasey recreation trail area will be affected by the emissions.
- Existing trails on adjacent BLM parcels, particularly to the west along French Fry Trail should be considered in the analysis, including aesthetics and air quality.
- Concerns regarding truck/bicyclist interface along Iron Mountain Road. Iron Mountain Road is very popular with road bikers, and many mountain bikers use the stretch of Iron Mountain Road adjacent to Crystal Creek Aggregate to connect French Fry and Trail 58/Middle Creek in a loop.

- The EIR should address potential impacts of the project on recreation in the area, including mountain biking, road biking, and hiking. Potential impacts include aesthetic impacts from clearing and mining, noise from blasting, odor from the proposed asphalt plant, increased runoff/turbidity to Middle Creek or Rock Creek, dust generation, and increased truck traffic along Iron Mountain Road.
- The project should consider potential mitigation measures, such as building and maintaining an alternate bike route to Iron Mountain Road that connects the French Fry and Trail 58 trailheads (potentially along the historic railroad grade).

Traffic & Circulation

- Will there be an increase for vehicle accidents on Iron Mountain Road, given the increase in large vehicles and trucks to haul the materials? The road is narrow and windy in many parts and the speed limit is 45 mph. Will adding more on the road cause increased traffic problems?
- Is the increased traffic going to be a problem for the school buses that have routes along Iron Mountain Road? The driveway of CCA is a designated bus stop for the Shasta Union Elementary School District. Will this be safe for children to have a bus stop at the driveway of an asphalt plant?
- Will there be increased traffic crossing Iron Mountain Road near the site?
- Existing bicycle safety issue along Iron Mountain Road should be considered in the traffic assessment and include upgrading of warning signs to better warn and educate the motoring public of on-road bicyclists.
- Increase in truck traffic along Iron Mountain Road.
- Impacts to cyclists utilizing State Route 299 in the vicinity of Iron Mountain Road.
- The cumulative truck traffic associated with the recent expansion of the Weyerhaeuser lumber yard.
- Intersection with Salt Creek Heights subdivision is currently presenting problems with cars slowing to turn into the subdivision.
- Dangerous existing condition of the State Route 299 and Iron Mountain Road intersection.
- The original structural section of Iron Mountain Road was not designed or built to handle to increased Traffic Index (TI) that is project to be generated by the new asphalt plant.
- Heavy truck traffic traveling west of SR-299 could negatively impact traffic coming from Redding and the surround areas to Whiskeytown and all the other outdoor recreation areas that residents and visitors alike enjoy using.
- Impacts along truck routes through Redding impacting schools.
- Recommendation to provide improvements at the State Route 299 and Iron Mountain Road intersection that includes widening to accommodate turn pockets and appropriate lane tapers. See November 1, 2019 email provided by Caltrans.

Utilities & Service Systems

- Where will this plant get water to run its operation? Will they impact the Shasta Community Service District water?
- The analysis should address increased demands on water services. Can Shasta Community Services District (SCSD) provide service to current and future customers with implementation of the proposed project?

Wildfire

- What steps would be taken to make the area safe from any fires which could be caused by an asphalt batch plant given the combustible nature of the materials?
- Not enough fire breaks surround the current operation.
- Propane explosions associated with the asphalt plant and increase of fire risk offsite.

Recommended Mitigation Measures

- Recommendation 1. At the existing sign located on *northbound* Iron Mountain Road (near the turnoff from SR-299/Eureka Way) replace the SHARE THE ROAD and BICYCLE LOGO signs with California Highway Manual sign R117(CA) PASS 3-FT MIN. *The existing signpost should be suitable.*
- Recommendation 2. Install a signpost with the same signage as Recommendation 1, after the *southbound* lane passes through the industrial area (between the industrial area and SR-299). *This will likely require a new signpost.*
- Recommendation 3. Install SHARE THE ROAD sign with a BICYCLE LOGO sign near and on both sides of Rock Creek and Middle Creek bridges. The signs taken down in Recommendation 1 could be reused for one of these four installations. *Existing signposts might be suitable for all of these signs.*
- Recommendation 4. To help mitigate the cumulative effects of traffic on Iron Mountain Road, install a signpost with the same signage discussed in Recommendations 1 and 2, close to the Keswick Boat Ramp exit, between the exit and SR-299. *Existing signposts might be suitable for this sign.*

Other Questions, Concerns & Comments

- Impacts to the general quality of life in the area.
- Need for the EIR to balance the analysis and not just highlight the positive aspects of the project.
- Concerns regarding loss of property values associated with the increased quarry operations.
- Impacts to mental health in an area where residents are dealing with depression from the Carr Fire.
- Residences along Keswick Dam Road to Lake Boulevard should be notified of the project.
- The Use Permit for the facility should be revisited every 20 years rather than approving it for over 100 years.
- What will the County's oversight of the CCA be in terms of ensuring mitigation performance?
- Has CCA ever been penalized for permit violations?
- Any change or amendments to the CCA use permits should hold the County's "feet to the fire" with more stringent oversight and enforcement requirements.
- Need for another asphalt plan in the Redding area?

Section 4.0 – Next Steps in the EIR Process

The Draft EIR will be subject to a minimum 45-day review period by responsible and trustee agencies and interested parties. Section 15087 of the State CEQA Guidelines lists optional procedures for noticing, including publication in a newspaper, posting onsite, or mailing to owners of a property or properties contiguous to the site. In accordance with the provision of Section 15085(a) and Section 15087(a)(1) of the State CEQA Guidelines, as amended, the County, serving as the Lead Agency, will: 1) publish a notice of availability of a Draft EIR in the Record Searchlight, a newspaper of general circulation, and 2) will prepare and transmit a Notice of Completion (NOC) to the State Clearinghouse (SCH) (proof of publication will be available at the Shasta County Department of Resource Management, Planning Division).

Any public agency or members of the public desiring to comment on the Draft EIR must submit their comments in writing to the individual identified on the document's NOC prior to the end of the public review period. During the public review period, the County will hold a regularly scheduled public hearing regarding the Draft EIR. The public will be afforded the opportunity to orally comment on the Draft EIR at the public hearing. Such comments shall be recorded and shall have the same standing and response requirements as written comments provided during the public review period. Upon the close of the public review period, the County will then proceed to evaluate and prepare responses to all relevant oral and written comments received from both citizens and public agencies during the public review period.

4.1 Guidelines for Commenting on the EIR

The purpose of the public review of the Draft EIR is to evaluate the adequacy of the environmental analysis in terms of compliance with CEQA. Section 15151 of the State CEQA Guidelines states the following regarding standards from which adequacy is judged:

An EIR should be prepared with sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonable feasible.

Section 15204(a) of the State CEQA Guidelines provides guidance to assist members of the public and public agencies in preparing comments on a Draft EIR. Section 15204.5(a) states:

In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.

Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviews should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a Lead Agency to conduct every test or perform all research, studies, or experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

Pursuant to the State CEQA Guidelines, and effect is not considered significant in the absence of substantial evidence; therefore, comments should be accompanied by factual support. Section 15204(c) of the State CEQA Guidelines states:

Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064 an effect shall not be considered significant in the absence of substantial evidence.

4.2 Summary of EIR Events and Documentation

While scoping is the initial step in the environmental review process, additional opportunities to comment on the project EIR will be provided. The County will provide for additional public input when the Draft EIR is released for public review, and during the public meetings for the Draft EIR. Table 4-1, EIR EVENTS AND DOCUMENTATION, below presents the proposed timeline for the proposed Crystal Creek Aggregate Use Permit and Reclamation Amendments environmental review process and identifies where in the process the public and agencies can provide additional input in the environmental review process. Please note that the dates below are preliminary in nature and subject to change.

**Table 4-1
 EIR EVENTS AND DOCUMENTATION**

Event	Purpose	Date
Completed Events and Documentation		
Notice of Preparation	Release of NOP	Notified interested parties and agencies of the County's intent to prepare an EIR. September 30, 2019 February 19, 2021
	Public Review Period	NOP public/agency review period to provide for public comments on the scope of the EIR. September 30 th to November 8, 2019 February 19 th to March 22, 2021
Public Scoping Meeting	Two Public Scoping Meetings were Held	Presented information on the project and provided opportunity for agency comments in a public forum. November 1, 2019 March 9, 2021
	Scoping Report for CEQA NOP Process	Reported public and agency comments on the proposed project and environmental issues of concern. This report includes comments made during the scoping process. November 2019 March 2021
Upcoming Events, Documentation, and Approximate Dates		
Draft EIR	Release of Draft EIR	Draft EIR Notice of Completion is filed with the State Clearinghouse. EIR presents analysis of impacts and proposes mitigation measures for the proposed project and alternatives brought forward for analysis. Includes other required analysis per CEQA. August 2021
	Public Review Period	45-day minimum CEQA-required public review period. August – October 2021
Final EIR	Release of Final EIR	Final EIR issued by the County, including responses to public comments. December 2021
	Decision on the Project	Should the County certify the Final EIR, a Notice of Determination is filed with the State Clearinghouse. January – February 2022
Notes:		
1. The NOP was mailed to federal, State, and local regulatory agencies.		
2. Refer to the County's website for specific EIR document dates: https://www.co.shasta.ca.us/index/drm_index/planning_index/eirs/crystal-creek-aggregate		

Section 5.0 – Appendices

2019 Scoping

Appendix 5.1 - 2019 Notice of Preparation

Appendix 5.2 - 2019 Scoping Meeting Materials

Appendix 5.3 - Comment Letters Received in Response to the 2019 NOP

Appendix 5.4 - AB 52 Notification Letters

2021 Scoping

Appendix 5.5 - 2021 Initial Study and Notice of Preparation

Appendix 5.6 - 2021 Scoping Meeting Presentation

Appendix 5.7 - Comment Letters Received in Response to the 2021 NOP

2019 Scoping

Appendix 5.1 2019 Notice of Preparation

NOTICE OF PREPARATION

TO: State Clearinghouse
State Responsible Agencies
State Trustee Agencies
Other Public Agencies
Interested Organizations
Members of the Public

FROM: County of Shasta
Shasta County Dept. of Resource Management,
Planning Division

CONTACT: Lio Salazar, Senior Planner
1855 Placer Street, Suite 103
Redding, CA 96001
(530) 225-5532

SUBJECT: Notice of Preparation of an Environmental Impact Report (EIR) for the Crystal Creek Aggregate Expansion Project (General Plan Amendment 19-0003, Zoning Plan Amendment 19-0002, Use Permit Amendment 19-0007, and Reclamation Plan Amendment 19-0001)

Shasta County is the Lead Agency under the California Environmental Quality Act (CEQA), and is preparing an Environmental Impact Report (EIR) for the project identified as the Crystal Creek Aggregate Expansion Project.

Attached to this Notice of Preparation (NOP) are a description of the probable environmental effects of the project (Attachment 1) and a detailed project description (Attachment 2), including a map indicating the location of the project area and relevant project related maps and figures.

The EIR will consider all substantive environmental issues which are raised by responsible agencies, trustee agencies, other interested agencies, and members of the public or related groups during the NOP process, and will analyze these potential effects in detail and to the extent necessary to make a determination on the level of significance of such effects. Discussion of those environmental effects determined to result in no impact or a less-than-significant impact will be limited to a brief explanation in the EIR of why those effects are not considered potentially significant.

The following agencies may be a Trustee Agency and/or Responsible Agency for the proposed project, or have other jurisdiction/interests concerning the proposed project.

United States Fish and Wildlife Service (USFWS)
United States Army Corps of Engineers (ACOE)
United States Mine Safety and Health Administration (MSHA)
United States Bureau of Land Management (BLM)
California Department of Fish and Wildlife (DFW)
California Department of Forestry and Fire Protection (Cal Fire)
California Department of Transportation (Caltrans)
California Department of Toxic Substances Control (DTSC)
California Department of Resources and Recycling and Recovery (CalRecycle)
California Regional Water Quality Control Board (RWQCB)
California Division of Mine Reclamation (DMR)
California Division of Occupational Safety and Health (Cal OSHA)
Shasta County Resource Management Agencies (Air Quality, Environmental Health, Building, Fire)
Shasta County Department of Public Works (DPW)
Shasta County Sheriff's Department (Sheriff)

Shasta Community Services District (SCSD)
Shasta Union High School District (SUHSD)
Redding School District (RSD)
City of Redding (COR)

Whether your agency is or is not listed above we need to know the views of your agency or organization as to the scope and content of the environmental information germane to your agency's statutory responsibilities or of interest to your organization in connection with the proposed project. Specifically, we are requesting the following:

1. Identify potentially significant environmental effects, alternatives, and recommended mitigation measures that you believe need to be explored in the EIR with supporting discussion of why you believe these effects may be significant.
2. Describe special studies and other information that you believe are necessary in order for the County to analyze the potentially significant environmental effects, alternatives, and recommended mitigation measures you have identified.
3. Provide the name, title, and telephone number of the contact person from your agency or organization that we can contact regarding your comments.
4. If you are a public agency, state if your agency will be a responsible or trustee agency for the project and list the permits or approvals from your agency that will be required for the project and its future actions.

Due to the time limits mandated by State law, your response must be received by the County of Shasta by the following deadlines:

- **For responsible and trustee agencies, not later than 30 days after you receive this notice,**
- **For all other agencies, organizations, and individuals not later than 30 days from publication of this Notice of Preparation. The 30-day review period ends on Tuesday, October 29, 2019.**

If we do not receive a response from you/your agency or organization within the applicable time frame, we will presume that you/your agency or organization has no response.

A responsible agency, trustee agency, or other public agency may request a meeting with Shasta County or its representatives in accordance with Section 15082(c) of the CEQA Guidelines. Electronic copies of the NOP are available by clicking on the Crystal Creek Aggregate Expansion Project link on the Shasta County Department of Resource Management homepage at:

http://www.co.shasta.ca.us/index/drm_index/planning_index/eirs.aspx.

Please provide your responses and any direct questions to the attention of Lio Salazar, Senior Planner, via mail/delivery to Shasta County Department of Resource Management, Planning Division, 1855 Placer Street, Suite 103, Redding, CA 96001 or via e-mail to lsalazar@co.shasta.ca.us. Phone (530) 225-5532.

Date: 9/30/19  Lio Salazar, Senior Planner

POTENTIAL ENVIRONMENTAL IMPACTS OF THE CRYSTAL CREEK AGGREGATE EXPANSION PROJECT

Project Location and Setting:

The project site is an existing quarry located in the community of Keswick, on the west side of Iron Mountain Road, approximately 1.5 miles north of the Intersection of Iron Mountain Road and State Highway 299 West, and directly across from the intersection of Iron Mountain Road and Laurie Ann Lane (10936 Iron Mountain Road). Detailed location information including coordinates and a map indicating the location of the project area provided in the attached detailed project description.

The existing quarry is located in an industrial area in the community of Keswick. Surrounding land uses consist of industrial to the east, low-density residential to the north and southeast, and undeveloped land to the south and west.

The topography of the existing quarry floor has been made relatively flat by the removal of the aggregate material. The existing bowl shaped quarry face extends upslope and to the west from the quarry floor with horizontal benches having been or to be established as excavation proceeds to the extent of the existing quarry boundary. There is an approximate 200-foot change in elevation from the existing quarry floor to what would be the top of the quarry face based on the current mining plan.

The project site is located within the boundary of the 2018 Carr Fire. Prior to the area being impacted by the Carr Fire, the primary vegetation type present in unmined portions of the project site and vicinity was predominantly knob cone pine and chaparral with scattered oaks and ponderosa pine. In areas where the fire burned with lesser intensity, the composition of species remains as it existed prior to the fire. Currently, in unmined portions of the project site and vicinity where the fire burned with greater intensity, vegetation consists mostly of secondary successional vegetation.

Project Description:

Crystal Creek Aggregate (CCA) proposes to expand their existing aggregate mining operation established at the project site in 1990 and subsequently expanded in 2008, and add an asphalt batch plant. The proposal would expand an approved mining use permit area of 110.24 acres and an approved reclamation plan area of 108.87 acres to 179.97 acres, in conjunction with General Plan and Zoning Plan amendments from Natural Resource Protection – Open Space (N-O) to Mineral Resource (MR) and from Unclassified (U) to Mineral Resource (MR), respectively. The overall Project area within which general plan, zoning plan, use permit and reclamation plan amendment approvals are requested is 179.97 acres.

The attached detailed project description narrative provides background information; an overview of the proposed project entitlement application approvals being sought; detailed descriptions of the proposed entitlements (including relevant figures); and discussions regarding reclamation plan objectives, phasing, prescriptions, additional policies, and CEQA Project Objectives.

Aesthetics:

The project would increase the permitted post-mining bench height from 24 feet to 40 feet and extend said benches up to the top of the existing ridgeline exposing a series of 40-foot-high vertical walls of rock, the buff color of which would contrast with the adjacent grey-green vegetated area. The bench tops would be planted with native trees and shrubs as part of the proposed reclamation plan. Reclamation would occur in phases, but for periods of time and/or until reclamation vegetation is established some rock faces would be exposed.

The EIR will provide an assessment and determination regarding the significance of the aesthetic impacts of the project.

Agriculture and Forestry Resources

The project site may include timberland as defined in Public Resources Code section 12220(g). If the project site includes timberland, the project may result in the conversion of timberland if the proposed post reclamation conditions would forestall the ability of said timberlands to be managed for one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

The EIR will provide an assessment and determination regarding the significance of Agriculture and Forestry Resources impacts of the project.

Air Quality and Greenhouse Gas Emissions:

The project would generate or increase construction and operational air contaminant and greenhouse gas emissions, including dust from construction and mining operations, diesel emissions from on- and off-road vehicles and equipment, and diesel and process emissions, including odor, from the asphalt batch plant. These emissions would have the potential to impact regional and local air quality in the vicinity of the project site and to contribute to impacts on global climate.

The EIR will provide an assessment and determination regarding the significance of Air Quality and Greenhouse Gas Emissions impacts of the project.

Biological Resources:

The project may impact terrestrial, avian, and wetland or other hydrologic habitat that survived the Carr Fire or is currently recovering from the Carr Fire, including potential habitat for candidate, sensitive, and special-status species.

The EIR will provide an assessment and determination regarding the significance of Biological Resources impacts of the project.

Cultural Resources:

The project would involve physical disturbance to ground surface and sub-surface components in conjunction with aggregate quarrying and mining activities. Such activities have the potential to impact cultural resources that may be located within the project site.

The EIR will provide an assessment and determination regarding the significance of Cultural Resources impacts of the project.

Energy:

The project would involve the use of diesel fuel, electricity, and other sources of energy during construction and operations.

The EIR will provide an assessment and determination regarding the significance of Energy impacts of the project.

Geology and Soils:

The project would expose soils to potential erosion, modify the topography of the site and increase blasting to the extent that the geologic stability of the site may be impacted, and would alter geographic features present at the site.

The EIR will provide an assessment and determination regarding the significance of Geology and Soils impacts of the project.

Hazards and Hazardous Materials:

The project would involve construction and operations that would involve the use and/or transport of potentially hazardous materials, including asphalt cement (a product of crude oil), diesel fuel, lubricants, and other industrial materials.

The EIR will provide an assessment and determination regarding the significance of Hazards and Hazardous Materials impacts of the project.

Hydrology and Water Quality:

The project would alter the drainage pattern upslope of the existing quarry and expand a post reclamation open water pond at the quarry floor. Soils exposed and/or disturbed by mining would be a potential source of polluted storm water run-off which if discharged from the site could impact downstream surface water quality.

The EIR will provide an assessment and determination regarding the significance of Hydrology and Water Quality impacts of the project.

Land Use and Planning:

The project proposes General Plan and Zoning Plan amendments from Natural Resource Protection – Open Space (N-O) to Mineral Resource (MR) and from Unclassified (U) to Mineral Resource (MR), respectively.

The EIR will provide an assessment and determination regarding the significance of Land Use and Planning impacts of the project.

Mineral Resources:

The project would expand the development and extraction of aggregate material, a mineral resource of value to the Region and State, and facilitate production of asphalt. These products could provide a public benefit to the Region and State through their potential use in public works projects.

The EIR will provide an assessment and determination regarding the significance of Mineral Resources impacts of the project.

Noise:

The project would introduce new temporary and long-term noise sources (asphalt plant construction and operations) and increase production of noise from existing sources (as a result of increased maximum and average yearly aggregate production and blasting).

The EIR will provide an assessment and determination regarding the significance of Noise impacts of the project.

Public Services:

The project site is served by the Shasta Community Services District (domestic and fire protection water), Shasta County Fire Department (fire protection and emergency medical services), and Shasta County Sheriff's Department (law enforcement).

The EIR will provide an assessment and determination regarding the significance of Public Services impacts of the project.

Transportation:

The project would increase maximum and annual average production of aggregate material and introduce the production of a new product (asphalt), including the import of material to be recycled for use in producing asphalt. Transport of materials to and from the site would result in increased use of public roads and intersections, including State Highway 299 West.

The EIR will provide an assessment and determination regarding the significance of Transportation impacts of the project.

Tribal Cultural Resources:

The project is located within the Wintu Tribe of Northern California's (Tribe) geographic area of traditional and cultural affiliation (GATCA). In accordance with Public Resources Code section 21080.3.1, the Tribe has requested formal notice of and information on projects proposed within the Tribe's GATCA for which Shasta County will serve as lead agency in accordance with the California Environmental Quality Act (CEQA).

The project would involve physical disturbance to ground surface and sub-surface components in conjunction with aggregate quarrying and mining activities. Such activities have the potential to impact tribal cultural resources that may be located within the project site.

In accordance with the requirements of Assembly Bill (AB) 52, and more specifically Public Resources Code section 21080.3.1, Shasta County will provide notice of, and information regarding, the project to the Tribe. If the Tribe requests consultation within 30 days of notification, consultation will be initiated by Shasta County and proceed in accordance with the requirements of AB52.

The EIR will provide an assessment and determination regarding the significance of Tribal Cultural Resources impacts of the project.

Utilities and Service Systems:

The project would alter the existing drainage pattern of the site which could require or result in the relocation, alteration, or new construction of storm water drainage facilities on- or off-site. The project

would increase maximum and average annual production. Construction activities and increased production could increase the generation of solid waste from the project site.

The EIR will provide an assessment and determination regarding the significance of Utilities and Service Systems impacts of the project.

Wildfire:

The project site is located in a very high fire hazard severity zone and would involve the use of heavy equipment on steep vegetated slopes and industrial production processes that involve high heat inputs.

The EIR will provide an assessment and determination regarding the significance of Wildfire impacts of the project.

Cumulative Impacts:

The probable impacts of the project may be individually limited, but cumulatively considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The EIR will provide an assessment and determination regarding the significance of Cumulative Impacts of the project.

CRYSTAL CREEK AGGREGATE PROJECT DESCRIPTION NARRATIVE

Crystal Creek Aggregate (CCA) proposes to expand their existing aggregate mining operation established in 1990 at their current location in Shasta County on Iron Mountain Road, approximately one mile northeast of State Route 299 W (refer to **Figure 1, Project Location**). The operation would expand from an approved use permit area of 110.24 acres and a reclamation plan area of 108.87 acres to 179.97 acres. The overall Project area is 179.97 acres within which general plan, zoning, use permit and reclamation plan amendments approvals are requested. This Project Description Narrative provides background information; an overview of the proposed project entitlement application approvals being sought; detailed descriptions of the proposed entitlements; and discussions regarding reclamation plan objectives, phasing, prescriptions, additional policies, and CEQA Project Objectives.

BACKGROUND

CCA was originally permitted in 1990 under Shasta County Use Permit UP-24-90 and Reclamation Plan 1-90. Subsequently in 2008 the following entitlements were approved; General Plan Amendment 07-005, Zone Amendment 07-020, Use Permit Amendment, UP-07-020, and Reclamation Plan Amendment RP-07-022.¹ A California Environmental Quality Act (CEQA) Mitigated Negative Declaration with findings as specifically set forth in Planning Commission Resolution Nos. 2008-066 and 2008-067 was also adopted to approve the various entitlements. A Property Line Adjustment 06-034 was approved on May 17, 2006.

In the early 1990s, CCA recognized that the aggregate reserves remaining within their existing land ownership could potentially be depleted by 2010. CCA began to evaluate the potential of acquiring adjacent lands owned by the U.S. Bureau of Land Management (BLM) due to the known geology of the area along with the proven quality of the aggregate material. CCA initiated an exchange for 225 acres owned by BLM adjacent to the CCA operation. The exchange was possible since it conformed to the *Redding Resource Management Plan* (RMP) approved in July 1993. The decision to approve the land exchange was issued on May 11, 2004. An environmental assessment under the National Environmental Policy Act (NEPA) was prepared and a Finding of No Significant Impact (FONSI) decision was also made on May 11, 2004.

After CCA was able to obtain the 225 acres from BLM, application was made in July 2007 to Shasta County for the following entitlements:

- Amend the General Plan land use designation of two parcels totaling approximately 115 acres from *Natural Resource Protection - Open Space (N-0)* to *Mineral Resource (MR)*;
- Rezone the same 115 acres from *Unclassified (U)* to *Mineral Resource (MR)* zone district;
- Amend the Use Permit for an existing quarry mining operation to extend the termination date of the operation from February 22, 2010 to December 31, 2072, and to expand the quarry area from 53.57 acres to 110.24 acres; and,
- Amend the Reclamation Plan to include expansion of the quarry by 56.67 acres.
- While not an entitlement requiring discretionary action by either the Planning Commission or Board of Supervisors, the Property Line Adjustment was necessary to separate the Reclamation Plan and Use Permit area from other properties owned by the Comingdeer Family.

¹ All the entitlements were approved by the Planning Commission on June 12, 2008 whereas, the General Plan and Zone Amendments were also approved, as required by State law, by the Board of Supervisors on August 5, 2008.

Of the 225 acres acquired from BLM, 115 acres were amended from *Public Land (PL)* to the *Mineral Resource (MR)* General Plan land use classification and rezoned from *Unclassified (U)* district to *Mineral Resource (MR)* district. Within the 115 acres, CCA proposed to mine 56.67 acres. This additional area approved to be mined would have extended the life of the operation another 65 years beyond 2007 to December 31, 2072. Production of up to 250,000 tons per year was approved to occur in six phases encompassing approximately ten years per phase, except for the last phase which was for 15 years. Estimates for completion of each phase were calculated based on the volume which could be sold at maximum production during an average ten year period. However, the actual completion of each phase was not time dependent since the depletion of permitted reserves was based on market demand.

CCA sells about twenty aggregate products. These products include base rock, drain rock, decorative stone, riprap, structural backfill, sand, plaster sand and specialty products. The stone products are desired due to their attractive surfaces and the sand is requested for its attractive golden color. The specialty products are utilized by businesses/public agencies for projects such as golf courses, walking paths and landscaping. A local company uses the sand as a component of a product used as substitute pavement for asphalt surfaced parking lots. The market area for some of CCA's products ranges from Portland, Oregon to the San Francisco Bay Area.

CCA plant facilities include a rock crushing/screening plant, washing operation, mobile office trailer (14 feet by 70 feet), truck scales, diesel fuel storage tanks of 1,000 and 20,000 gallons, one waste oil tank of 350 gallons, two motor oil and one lubricating oil tanks (90 gallons each), and five settling and two recycle ponds. A Reclamation Plan addresses the reclamation of the existing and proposed mined and processing areas. Based on the *County Assessors Annual Production Report* submitted by CCA between the year 1990 and 2017, gravel sold ranged between a low of approximately 48,000 tons in 1990 and a high of approximately 270,000 tons in 2001. CCA employment base is currently comprised of eight full-time and one part-time employee.

PROPOSED PROJECT APPLICATIONS

Crystal Creek Aggregate's proposed project application to Shasta County is for the following actions which involves an overall Project area of 179.97 acres:

- General Plan Amendment of 28.46 acres from *Open Space (N-O)* to *Mineral Resource (MR)* so that a Zone Amendment could be processed for approval of an area that would allow for expansion of the current Project (refer to **Figure 3**).
- Zone Amendment of 28.46 acres from *Unclassified (U)* to *Mineral Resource (MR)* necessary to be consistent with the General Plan Amendment and to allow the processing of a use permit allowing operational expansion (refer to **Figure 3**).
- Use Permit UP 07-20 Amendment to expand the mining area by 69.73 acres from 110.24 to 179.97 acres, expand hours of operation, increase yearly blasting maximums, modify quarry bench heights and widths, and to permit the installation and operation of a hot mix asphalt batch plant (refer to **Use Permit Maps, 3 Pages**).
- Reclamation Plan RP 07-022 Amendment to expand the Reclamation Plan area by 71.10 acres from 108.87 to 179.97 acres and to extend the estimated life of the mining operation by 150 years to Year 2169 (refer to **Reclamation Plan Maps, 6 Pages**).

PROPOSED GENERAL PLAN AND ZONE AMENDMENTS

To be consistent with the requested General Plan land use classification of *Mineral Resource (MR)*, a zone amendment from the *Unclassified (U)* zone district to the *Mineral Resource (MR)* zone district is also requested for 28.46 acres located within current Assessor Parcel No. 065-250-025 which currently encompasses 110.18 acres. The General Plan and Zone Amendments would be compatible with the existing general plan and zoning of the CCA plant operation which is *Manufacturing – Interim Mineral Resource overlay (M-IMR)*. These requested entitlements are supported by the *1997 Mineral Land Classification for Shasta County* by the State of California Department of Conservation that classified the existing operation and adjacent lands to the west and south as *Mineral Resource Zone Category MRZ-2* “wherein lands classified as MRZ-2 are areas that contain identified mineral resources.” The classification extends beyond the limits of the proposed Reclamation Plan and Use Permit Amendment area. Approval of the *Mineral Resource (MR)* land use classification and zone district designation also provide for land use compatibility with the existing operation. Furthermore, this action preserves and protects a mineral resource of regional and local importance to meet the future needs of the North State and in particular Shasta County.

PROPOSED USE PERMIT & RECLAMATION PLAN AMENDMENTS

As previously discussed, CCA proposes the expansion of CCA operations to 179.97 acres, based on the Reclamation Plan and Use Permit Amendments. However, CCA does not propose additional structures other than the hot mix asphalt batch plant; moving the locations of the existing scales and office, crushing and screen plant, primary and secondary entrances/exits, or creating new settling or recycle wash ponds; or removal of additional aggregate beyond the projected 450,000 CYs (900,000 tons) to be extracted and processed per year.

The addition of a hot mix asphalt batch plant is proposed due to anticipated future market demand in the area and to provide “one stop” aggregate and asphalt related supply material services at a location where access to the west, east south and north is available, particularly for projects along the SR 299 corridor. Furthermore, locating aggregate and asphalt concrete materials at one location reduces vehicle miles traveled not only in the Redding, Anderson and Shasta Lake areas, but throughout Shasta County since aggregate is not hauled to an off-site asphalt plant.

Hot Mix Asphalt (HMA) is created by mixing and heating aggregate with asphalt oil. The type of asphalt plant proposed is a drum mix type that will be powered by propane gas which produces significantly less nitrogen oxide (NOX) emissions (approximately 76 percent less), sulfur dioxide (SO₂) emissions, and some hazardous air pollutants (HAPs) than an oil fired plant.² This process is a continuous mixing type process whereby the dryer is used, not only to dry the material, but also to thoroughly mix the heated and dried aggregates with the liquid asphalt cement. After mixing, the mixture is discharged at the end of the drum and is conveyed to HMA silos where the asphalt is stored. **Use Permit Maps, Page 3 of 3**, conceptually illustrates an asphalt plant configuration.

The CCA mining, crushing, screening and washing operations will function as they currently do except the mining area will be expanded to the west and south to create a quarry area of approximately 102 acres. The pond in the quarry will increase in surface area from 23.5 acres to 66.85 acres. Likewise, the ponds depth will be lowered by 100 feet from the previously approved pond bottom elevation of 700 feet to a proposed elevation of 600 feet. The five existing five settling ponds will remain and the two water recycling ponds will be filled in once aggregate from the quarry is depleted and as part of final Project site reclamation.

² EPA, December 2000. Tables 5 and 8. *Hot Mix Asphalt Plants Emission Assessment Report*

The additional area to be mined will extend the life of the operation another 97 years beyond the currently approved 2072 termination year based on removal of 37,290,000 CYs. However, CCA requests that there be no fixed termination date and instead utilize the removal of up to the 37,290,000 CYs of aggregate as the basis for determining when the mining operation would cease. It is anticipated that extraction will occur in 11 phases encompassing approximately ten years per phase, except for the last phase which could be 15 years. Estimates of completion of each phase are calculated based on the volume which could be sold based on maximum production over a average ten year period. However, as previously noted, actual completion of each phase is not time dependent since the depletion of permitted reserves is based on market demand.

The overburden and topsoil stockpile areas contain material stripped from the quarry as well as reject material from the crushing and screening operation which includes fines generated by the wash plant. Since reclamation is dependent on the availability of finished benches, there could be up to five years’ worth of material stored at any given time. Both topsoil and overburden stockpile areas will be subject to best management practices for erosion control to be specified in the Storm Water Pollution Prevention Plan (SWPPP) for the operation. The topsoil and overburden stockpile area will be sited to facilitate reclamation.

Table 1, Reclamation Plan & Use Permit Amendments, Current & Proposed Uses & Operational Changes provides a synopsis of the current operational requirements and those proposed by the Reclamation Plan and Use Permit amendments. **Table 1** provides a comparison between the existing and proposed uses and associated areas, hours of operation, annual and total volume of aggregate extraction, and the proposed asphalt batch plant yearly output, etc.

TABLE 1 RECLAMATION PLAN & USE PERMIT AMENDMENTS CURRENT & PROPOSED USES & OPERATIONAL CHANGES & REQUIREMENTS	
Current	Proposed
Reclamation Plan area – 108.87 acres Use Permit area – 110.24 acres ³ Quarry Mining area – 47.2 acres	Reclamation Plan area – 179.97 acres Use Permit area – 179.97 acres Quarry Mining area – 102 acres
Uses: 1. Aggregate mining 2. Aggregate crushing, screening, and washing ⁴ 3. Loading & off-site sale of sand, gravel & rock 4. Material stockpiling 5. Importation of topsoil to the Project site 6. Blasting	Uses: 1. Aggregate mining 2. Aggregate crushing, screening, and washing 3. Loading & off-site sale of sand, gravel & rock 4. Material stockpiling 5. Importation of topsoil to the Project site 6. Blasting 7. Asphalt plant – Manufacture 200,000 tons of asphalt concrete (AC) 8. Use of reclaimed asphalt pavement (RAP) when required ⁵ 9. Use of rubberized asphalt concrete (RAC) when required ⁶ 10. Importation and recycling of 50,000 cubic yards (CY) of used concrete or AC when required

³ The difference in acreages is due to the June 12, 2008 Staff Report for UP 07-020 to the Planning Commission identifying an area of 110.24 acres, whereas, the Reclamation Plan Maps identify a 108.87 acre area. The difference is insignificant.

⁴ Use Permit Minor Modification UP 07-020 M1 and Reclamation Plan Minor Modification RP 07-002 M1, dated May 16, 2012

⁵ Caltrans may require a certain percentage of RAP in the production of AC.

⁶ Caltrans and some cities and counties may require a certain percentage of RAC in the production of AC.

TABLE 1 RECLAMATION PLAN & USE PERMIT AMENDMENTS CURRENT & PROPOSED USES & OPERATIONAL CHANGES & REQUIREMENTS	
Current	Proposed
Volume of aggregate to be mined – 7.96 MCYs or 15,92 MTs	Volume of aggregate to be mined – 37.29 million cubic yards (MCYs) or 74.58 million tons (MTs)
Maximum permitted annual tonnage of processed aggregate is limited to 125,000 CYs (250,000 tons)	Maximum annual tonnage of processed aggregate to be limited to 450,000 CYs (900,000 tons)
Average volume of aggregate mined – 100,000 CYs (200,000 tons) – not a permit requirement	Average volume of aggregate mined – 250,000 CYs (500,000 tons)
Importation of material restriction 50,000 CYs (100,000 tons) of topsoil/year	Importation of material restriction 50,000 CYs (100,000 tons) of topsoil/year
Mining termination date – December 31, 2072	Mining termination date – June 15, 2169
Maximum quarry bench size – 22 ft. high by 30 ft. wide	Maximum quarry bench size – 40 ft. high x 40 ft. wide
Employees – 8 full-time & 1 part-time	Employees – 14 full-time & 1 part-time
Mining hours of operation: <ul style="list-style-type: none"> • 6 a.m. to 5 p.m. Monday – Saturday PST • 6 a.m. to 6 p.m. Monday – Friday PDT • 6 a.m. to 5 p.m. – Saturday PDT 	Mining hours of operation: <ul style="list-style-type: none"> • 6 a.m. to 5 p.m. Monday – Saturday PST • 6 a.m. to 8 p.m. Monday – Friday PDT • 6 a.m. to 5 p.m. – Saturday PDT Asphalt batch plant hours of operation: <ul style="list-style-type: none"> • Only during PST – 24 hours per day – Sunday evening/ Monday morning except for Saturday evening/Sunday morning. No restrictions for public works projects
Blasting per year – 12 times only between 9:30 a.m. to 3:30 p.m., Monday – Friday	Blasting per year – 40 times only between 9:30 a.m. & 3:30 p.m., Monday – Friday with minimum two-week notice to the Planning Division
Truck traffic on Iron Mountain Road: <ul style="list-style-type: none"> • Average 45 round trips. • Maximum 220 round trips. 	Truck traffic on Iron Mountain Road: <ul style="list-style-type: none"> • To Be Determined
Agreement for extraordinary maintenance of Iron Mountain Road	Agreement with the Department of Public Works for extraordinary maintenance of Iron Mountain Road
Wetland mitigation – 1.8 acres of marshes, wetland & riparian habitat (SMARA requires a minimum mitigation ratio of 1:1)	Wetland mitigation – To Be Determined
Originally approved for propane – converted to PG&E power in 2011	PG&E power

As previously discussed, the existing pond in the quarry will increase in surface area from approximately 23.5 acres to 66.85 acres and the depth will be lowered by 100 feet. The existing five settling ponds will remain and the two water recycling ponds will be filled in once aggregate from the quarry is depleted and as part of final Project site reclamation. For accuracy and completeness, it should be noted that the existing ponds and the expansion of the quarry pond are not regulated as “waters of the United States” pursuant to the federal Clean Water Act (CWA). Regulatory guidance from 1986 on, now adopted as part of the 2015 “Definition of ‘Waters of the United States’; Final Rule,” (80 FR 37054, 37098) describes features that are not “waters of the United States.” The Rule is in force in California, and excludes the following features:

- Artificial, constructed lakes or ponds created by excavating and/or diking dry land such as farm and stock watering ponds, irrigation ponds, settling basins, log cleaning ponds, cooling ponds, or fields flooded for rice growing

- Water-filled depressions created in dry land incidental to mining or construction activity, including pits excavated for obtaining fill, sand or gravel that fill with water (80 FR 37098)

The above descriptions apply to not only the; quarry pond, the five settling ponds and two recycling ponds but also to the various water-filled depressions throughout the Project site created by the existing mining operation. CCA proposes retaining the ponds, but not the depressions, and adding and protecting riparian habitat around the ponds as part of the project's reclamation plan. Because they are not federally regulated, this can be accomplished without first securing CWA authorization.

Wildland Resources Managers prepared the July 2019 "Biological Review Crystal Creek Aggregate Mine Expansion, Shasta County, California" which identifies the ponds. The report provides detailed information about "the present conditions of soils, vegetation, wetlands, [and] wildlife habitats," including how the project area was affected by the Carr fire. This information helps fulfill CEQA's goal of disclosing relevant information about the baseline conditions. Project impacts on these features does not depend on whether they are subject to particular government jurisdiction.⁷

Reclamation Plan Topics

As previously noted, the proposed Use Permit Amendment also requires an amendment to the currently approved Reclamation Plan. The Reclamation Plan describes the final post-reclamation condition of the site and the procedures which will be employed to reclaim the site. The Reclamation Plan addresses the following topics some of which are discussed in this Project Description.

- Reclamation Objectives
- Existing Conditions
- Establishment of Test Plots
- Phasing
- Reclamation Prescriptions
- Post-vegetation Monitoring
- Additional Reclamation Policies

Reclamation Plan Objectives

There are two types of end use objectives for the Project site resulting in different reclamation prescriptions. There is the eastern plant site area of 46.29 acres and the middle and western Project area of 133.68 acres. These prescriptions are as follows:

Industrial Use Area: The eastern area will be reclaimed to industrial uses after mining operations terminate. This end use would be consistent with both the current and proposed general plan land use designation and zoning classification.

Mineral Reserve Area: The middle and western side of the Project site will be reclaimed as a mineral reserve area. This use is consistent with the California Department of Conservation's classification of the site as *Mineral Resource Zone (MRZ-2)*.

⁷ The report is on file with the Shasta County Planning Division.

The reclamation program primary objectives are to; (a) establish a new visually pleasing vegetative cover that provides future fire protection; (b) stabilize the finished mined surfaces and prevent erosion; and, (3) revegetate with plant species adapted to this locale.

Phasing

The purpose of phasing for this Reclamation Plan Amendment is to divide the progression of mining into clearly identifiable mining segments since the depletion of permitted reserves is based on market demand, which is difficult to forecast. This allows reclamation to be started as soon as finished mining surfaces are completed and no longer needed by the operation except under certain circumstances. An example would be a quarry bench where finished grade is reached and the bench is resoiled and vegetated, except in areas on the bench where access by employees and equipment still needs to access a future mining area phase.

Phasing allows for reclamation to be started as soon as each segment is completed. The newly established vegetation will grow even as mining continues, minimizing visible indications of the activities and resulting in a variety of vegetation patterns surrounding the larger 66.85 acre quarry pond. Phasing also assists responsible and trustee agencies to determine compliance with the Reclamation Plan since reclamation areas are specifically defined. **Reclamation Plan Maps, Page 4 of 6** provides an overview of the phasing.

Table 2, Mining Phases & Volumes identifies the proposed 11 phases and associated volume of material based on the extraction and processing of 450,000 CYs (900,000 tons) per year.

TABLE 2 MINING PHASES & VOLUMES (Million Cubic Yards)		
Phase	Reserves	Cumulative Total
1	2.68	2.68
2	2.77	5.45
3	2.29	7.75
4	2.27	10.02
5	2.30	12.31
6	2.72	15.03
7	2.15	17.18
8	2.79	19.97
9	1.80	21.77
10	2.94	24.71
11	12.59	37.29

Phases 1 through 10 contain 24,700,000 CYs of aggregate, about 66 percent of the resource, located in the quarry that is above the pond surface. Phase 11 is the mine area below the 66.85 acre pond surface that contains 12,590,000 CYs of aggregate (34%). Mining begins in Phase 1 and terminates in Phase 10. However, Phase 11 “located” under the 10 phases can be mined at any time during the Reclamation Plan period since the mining of Phase 11 is dependent on the need for the particular type of rock sought for construction activities. Mining operational issues, such as coordination of dewatering activities with mining and the blending of surface and below surface materials, also influence the timing for removing aggregate in Phase 11. Phases 1 through 10 have nearly equal amounts of reserves, which vary between 2,150,000 CYs to 2,940,000 CYs.

Reclamation Prescriptions

Reclamation prescriptions deal with various operational components which include the plant site, quarry benches and their revegetation, ponds, and reclamation within the plant area, such as removing equipment that will not be utilized for future permitted industrial uses, clean up, final grading, filling of the recycle ponds, and post vegetation monitoring. The revegetation of benches provides a fulfillment of one of the primary objectives of the reclamation program to establish a new visually pleasing vegetative cover that provides future fire protection.

A Revegetation Plan for the quarry benches was prepared to create, not only an aesthetically pleasing reclamation feature, but to also establish a fire resistant plant community on the quarry benches.⁸ The 2018 Carr Fire devastated most of the vegetation and homes in the area efforts need to be undertaken not to repeat the event that occurred. The reclamation plan presents an opportunity to lower the fire danger in the area.

One of the main methods to achieve this goal is to eliminate fuel ladders where fire proceeds from lower vegetation into the crowns of trees. By reducing the amount of flammable material present (fuel load) this reduces the spread of fires. To achieve these goals brush species are eliminated from the plant pallet. In its place, the planting of ponderosa pines, grasses and forbs is proposed. Ponderosa pines were selected since they are indigenous to the area and grow in many locations. The trees will be initially planted with 8 foot by 8 foot spacing and then thinned out at a future date. The final upland bench planting would be pines trees spaced 20 to 30 feet apart with grasses and forbs as the understory species. The spacing of the trees reduces, not only the fuel load, but also the fuel ladder which could result in fire spreading from one tree to the other. The grasses and forbs pallet include plants required for erosion control.

Also addressed as a reclamation prescription is to establish a self-sustaining population of wetland/riparian vegetative species on the waterside of the lowest final bench, within 16 feet of the water's edge around the shoreline of the new quarry pond. Clusters of native willows and cottonwoods would be planted along the pond bank. Average spacing of the clusters are to be 110 feet on-center with 6 to 10 trees per cluster. Rock jetties would be placed along the bank and woody debris would be placed along the waterline, where feasible.

Additional Reclamation Policies

Additional reclamation policies address erosion and sediment control policies, topsoil and overburden policies, and other specific final reclamation procedures dealing with interior haul roads, stockpiles, general plant areas to be reclaimed and monitoring.

CEQA PROJECT OBJECTIVES

In accordance with State CEQA Guidelines §15124(b), a clear statement of objectives and the underlying purpose of the project shall be discussed. The project applicant has identified the following objectives for the proposed project:

1. Provide a comprehensively planned project that will continue to accommodate projected growth in construction related activities and related services, and also serve to help meet the current and future demands for Portland cement concrete grade aggregate and asphalt materials in Shasta County and the north state.

⁸ Wildland Resource Managers. May 2019. Revegetation Plan for Crystal Creek Aggregate Mine Expansion, Shasta County California. On file with the Shasta County Planning Division.

2. Expand an existing aggregate mining operation located in a known Mineral Resource Zone Category MRZ-2 “wherein lands classified as MRZ-2 are areas that contain identified mineral resources” as identified in the 1997 Mineral Land Classification for Shasta County by the State of California Department of Conservation.
3. Expand the existing aggregate mining operation to permit the installation and operation of a hot mix asphalt batch plant to provide “one stop” aggregate and asphalt related supply material services at a location in close proximity to the State Highway System whereby access is available to the west, east south and north and particularly for projects along the SR 299 corridor.
4. Expand the existing aggregate mining operation that continues to be compatible and complimentary of the existing open space areas immediately to the south, west and northwest of the project site and the industrial uses to the northeast and east of the project site.
5. Contribute to the improvement of the Shasta County economy by expanding a project that will increase sales taxes.

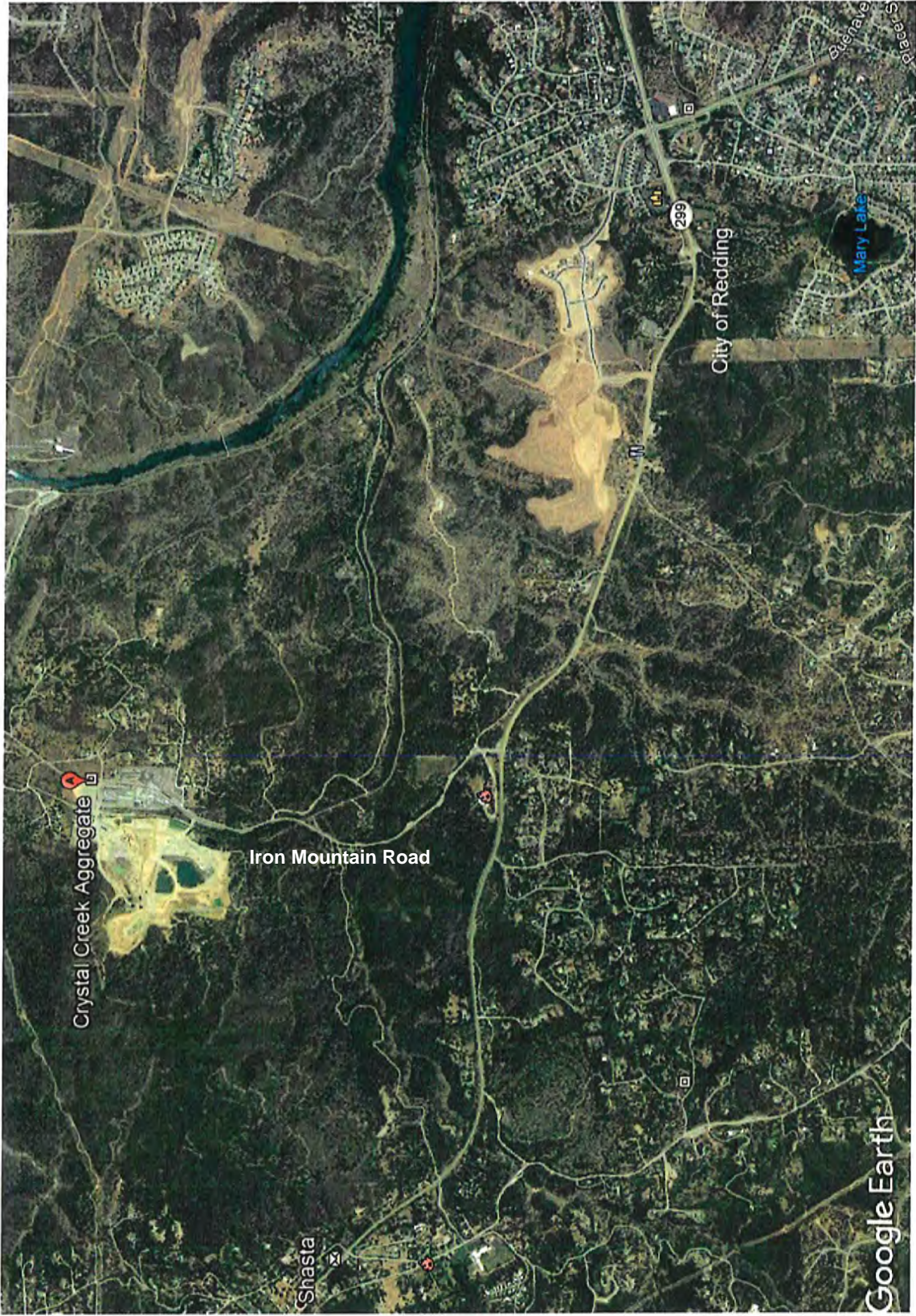
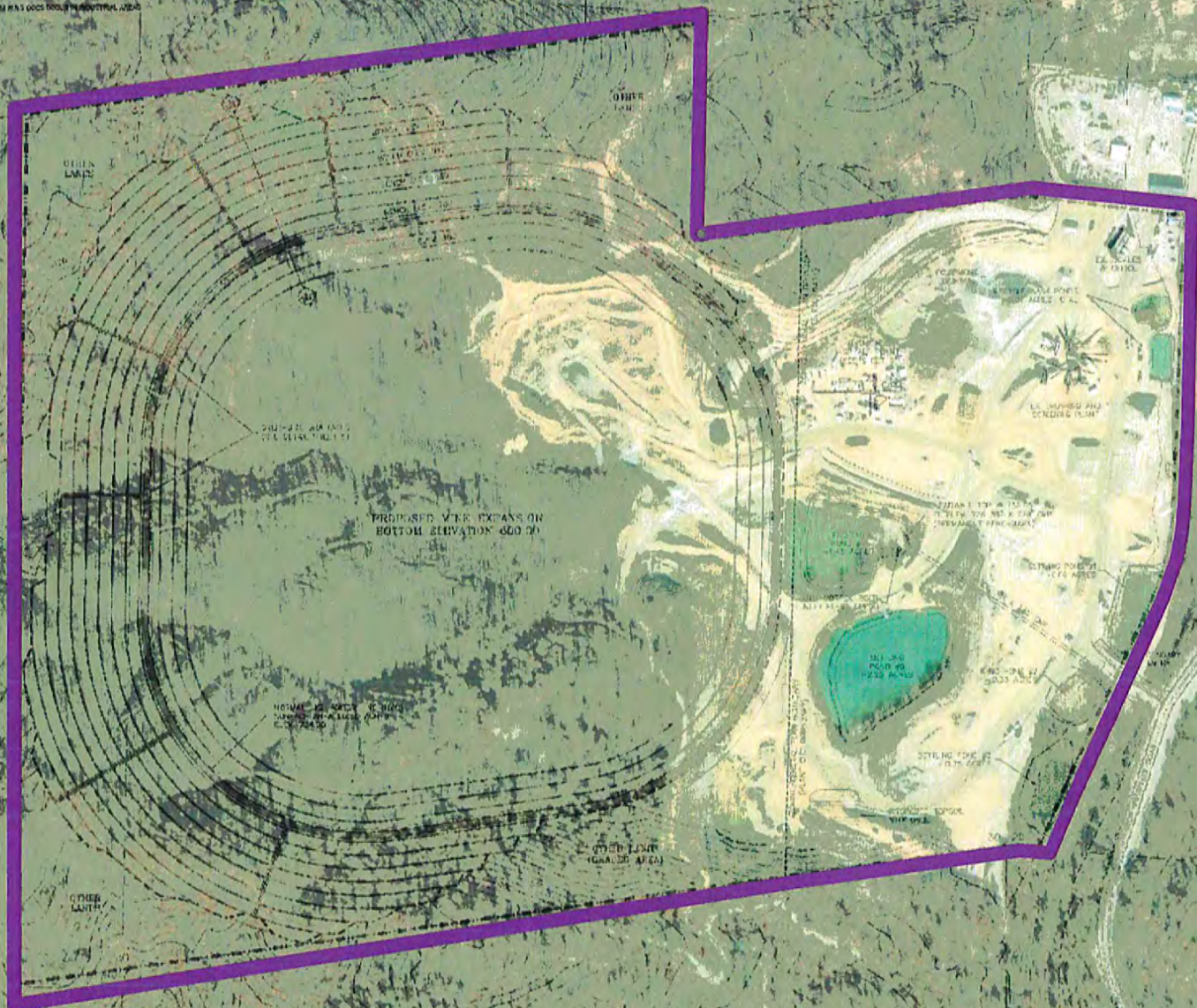


FIGURE 1 – PROJECT LOCATION

AERIAL OF MINE SITE



Source: Esri,

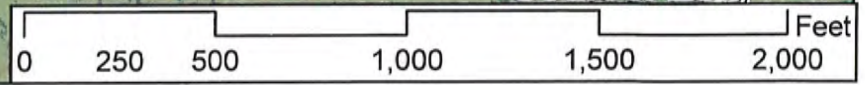
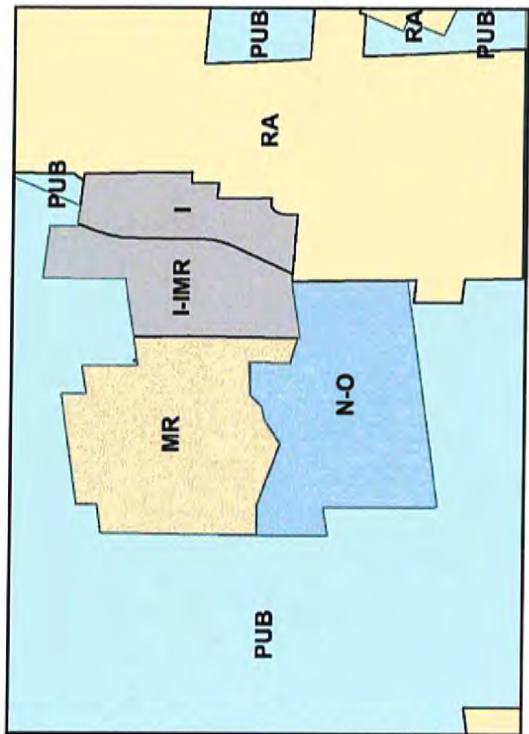
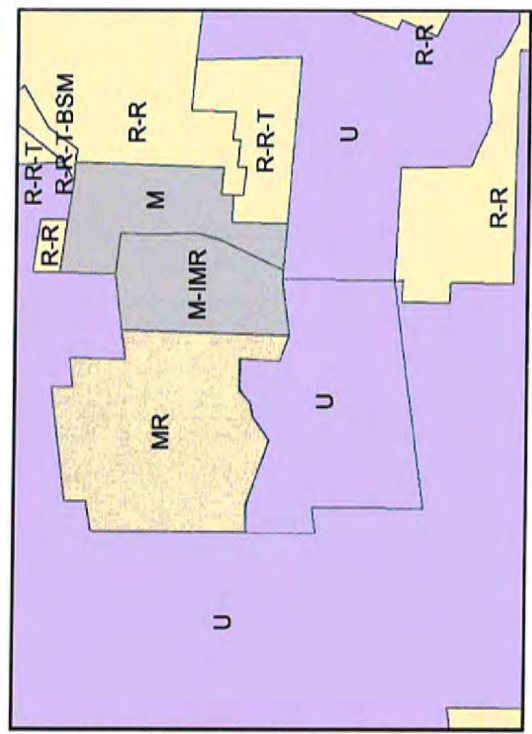




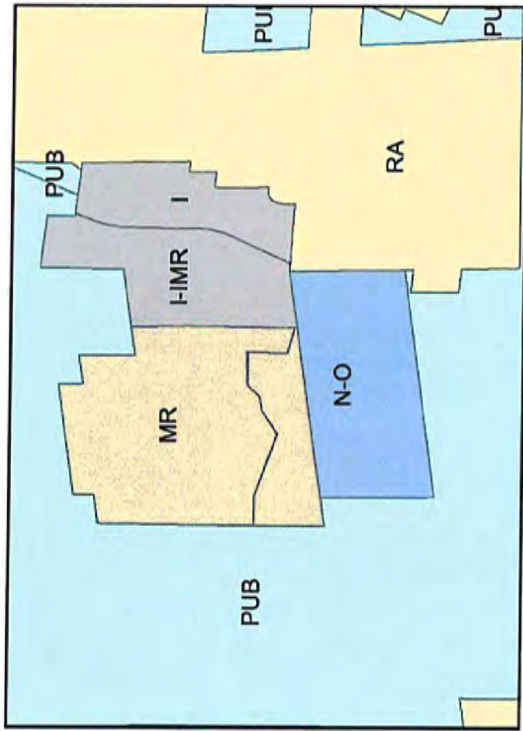
FIGURE 3 – EXISTING & PROPOSED GENERAL PLAN & ZONING DISTRICT



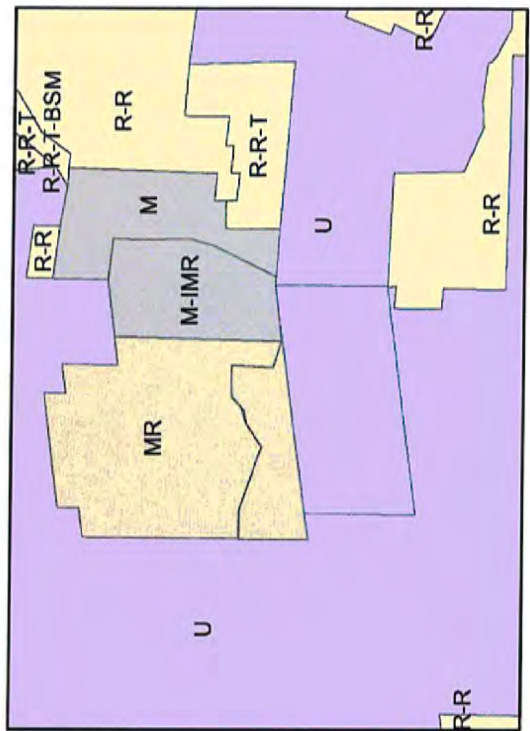
EXISTING GENERAL PLAN



EXISTING ZONING DISTRICT



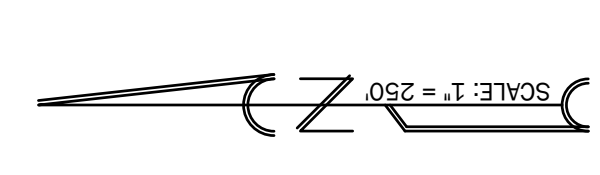
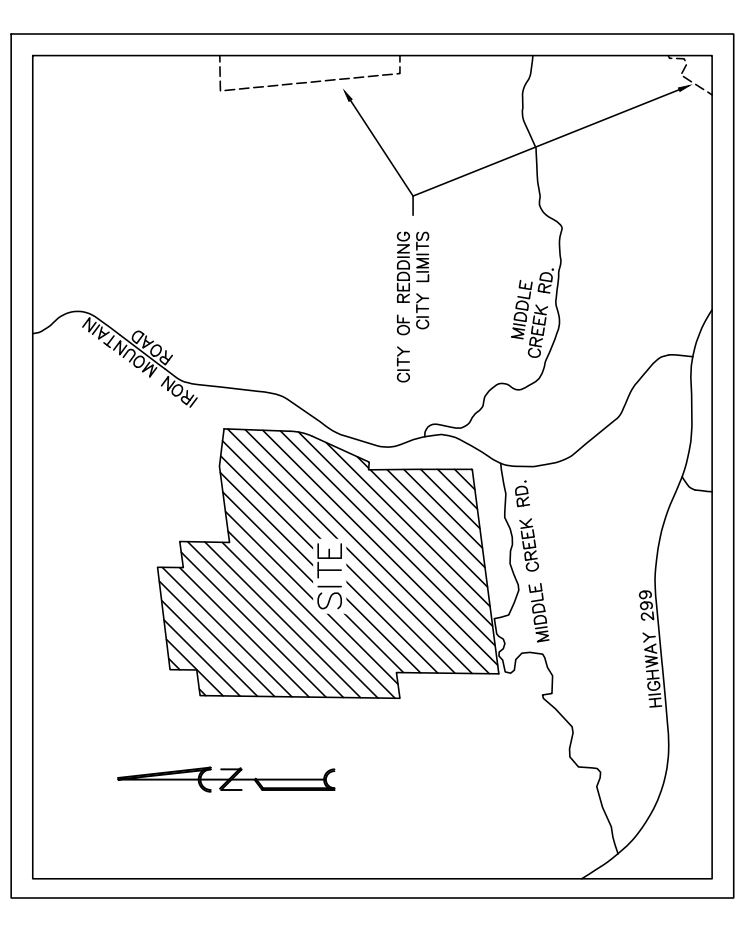
PROPOSED GENERAL PLAN



PROPOSED ZONING DISTRICT

General Plan and Zoning Mapping by The Land Designers





OWNER
 COMINGDEER FAMILY 2001 TRUST
 JERRY DALE & KERRY M TRUST
 10936 IRON MOUNTAIN ROAD
 REDDING, CA 96001
 (530) 224-7263

ENGINEER
 DUANE K. MILLER
 CIVIL ENGINEER, INC.
 PO BOX 1307
 ANDERSON, CA 96007
 (530) 365-5610

LAND PLANNER
 KEITH HAWBLIN
 LAND DESIGNERS, INC.
 1975 PLACER ST. SUITE A
 REDDING, CA 96001
 530-244-0506

APN
 065-250-002
 065-250-024
 065-250-025
 065-250-026
 065-260-010

APN	EX. GENERAL PLAN	EX. ZONING
065-250-002	I-IMR (Industrial; Interim Minerals)	M-IMR (General Industrial; Interim Mineral Resource)
065-250-024	MR (Mineral Resource)	MR (Mineral Resource)
065-250-025	MR (Mineral Resource)	MR (Mineral Resource)
PORTION OF 065-250-026	N-O (Open Space)	U (Unclassified District)
065-260-010	I-IMR (Industrial; Interim Minerals)	M-IMR (General Industrial; Interim Mineral Resource)



LEGEND

- RECORD BOUNDARY
- ADJACENT BOUNDARY
- ROW BOUNDARY
- APN BOUNDARY
- ZONING BOUNDARY
- 40' OG CONTOURS
- (EX) DRAINAGE COURSES
- (EX) CULVERT
- (EX) RECLAMATION BOUNDARY
- (N) RECLAMATION BOUNDARY
- (N) PROPOSED QUARRY LIMITS
- (EX) PONDS
- (EX) ROAD
- (EX) STOCKPILE AREAS
- AREA INCLUDED IN ZONING & GENERAL PLAN AMENDMENT

LOCATED IN SECTION 30 TOWNSHIP 32 NORTH, RANGE 5 WEST, M.D.M. IN THE UNINCORPORATED TERRITORY OF SHASTA COUNTY, CALIFORNIA

Shasta County
 Crystal Creek Aggregate, Inc.

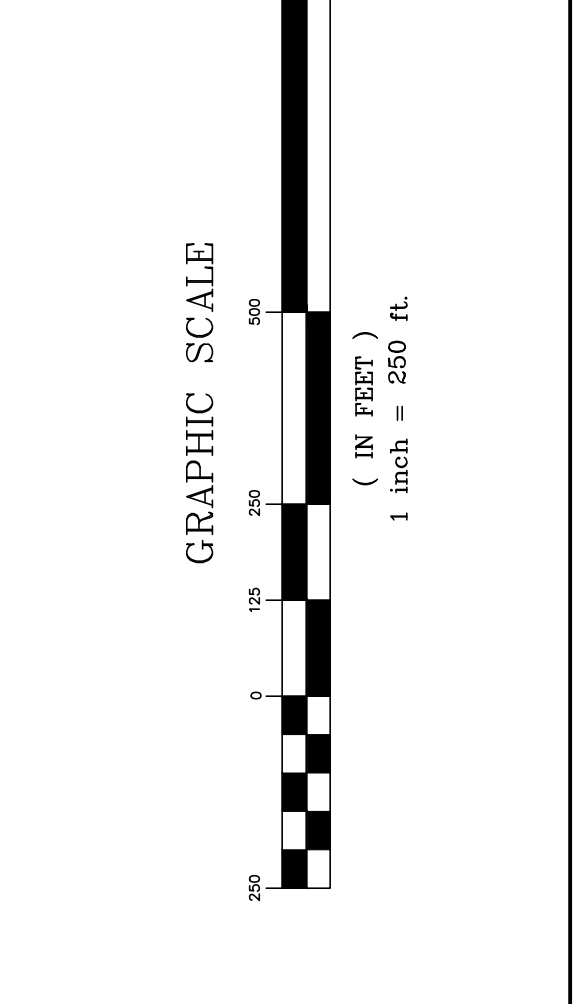
Project Plan

DUANE K. MILLER
 CIVIL ENGINEER, INC.
 No. 29490
 530-365-5610
 D:\PROJECTS\2019\20190815\065-250-026\15-008\065-250-026-010\PROJECT 8/27/2019

DATE: 8/27/19
 SHEET: 1
 OF: 1

SCALE: 1" = 250'

PLANS PREPARED UNDER THE SUPERVISION OF:

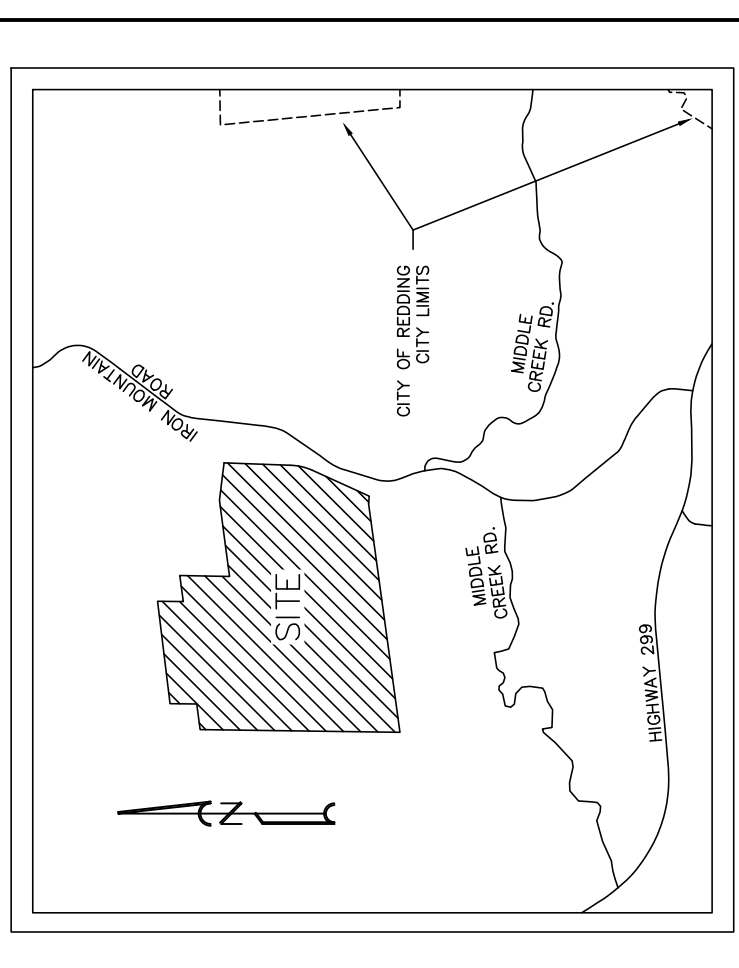


REVISIONS

NO.	DATE	DESCRIPTION	BY

1-800-227-5600

PROJECT 8/27/2019



VICINITY MAP
NOT TO SCALE

OWNER
COMINGDEER FAMILY 2001 TRUST
JERRY DALE & KERRY M TRUST
10936 IRON MOUNTAIN ROAD
REDDING, CA 96001
(530) 224-7263

LAND PLANNER
KEITH HAMLIN
LAND DESIGNERS, INC.
1975 PLACER ST, SUITE A
REDDING, CA 96001
530-244-0506

ENGINEER
DUANE K. MILLER
CIVIL ENGINEER, INC.
PO BOX 1307
ANDERSON, CA 96007
(530) 365-5610

APN
065-250-002
065-250-024
065-250-025
065-250-026 (PORTION)
065-260-010

APN	AREA (ACRES)	EX. GENERAL PLAN	EX. ZONING
065-250-002	29.19	I-IMR (Industrial; Interim Mineral Resource)	M-IMR (General Industrial; Interim Mineral Resource)
065-250-024	6.74	MR (Mineral Resource)	MR (Mineral Resource)
065-250-025	98.48	MR (Mineral Resource)	MR (Mineral Resource)
PORTION OF 065-250-026	28.46	N-O (Open Space)	U (Unclassified District)
065-260-010	17.10	I-IMR (Industrial; Interim Mineral Resource)	M-IMR (General Industrial; Interim Mineral Resource)

LEGEND

- (EX) LANDSCAPING
- (EX) PONDS
- (EX) STOCKPILE AREAS
- (EX) QUARRY AREA
- (EX) 30' PROJECT ENTRY ROAD
- (EX) 30' ON-SITE DRIVEWAY & PARKING
- (EX) TRUCK ROUTE (20'-40' WIDE)
- (EX) UNIMPROVED SITE ACCESS TRAILS
- RECORD BOUNDARY
- ADJACENT BOUNDARY
- APN BOUNDARY
- ROW BOUNDARY
- 10' OG CONTOURS
- (EX) DRAINAGE COURSES
- (EX) CULVERT

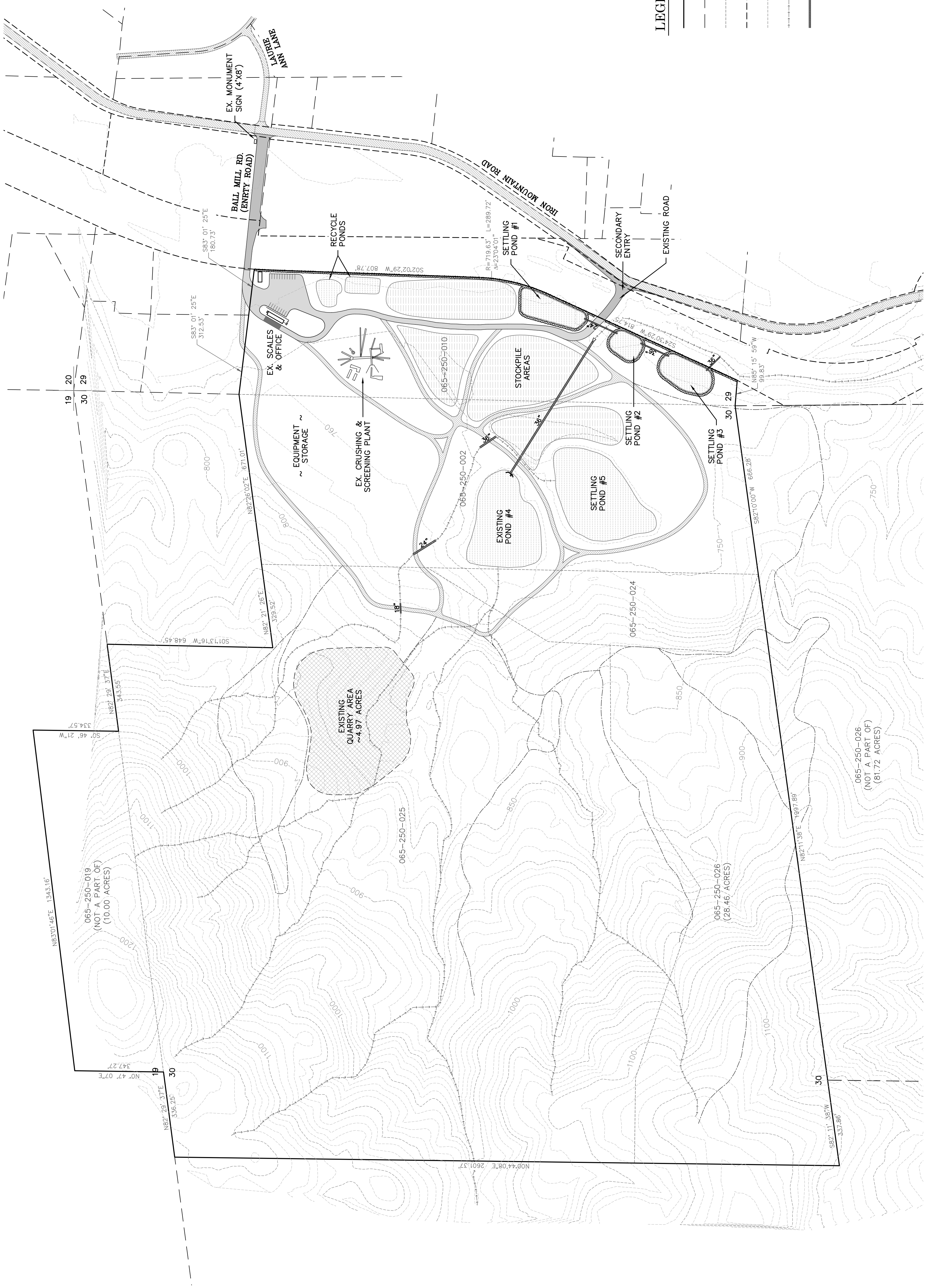
LOCATED IN SECTION 30, TOWNSHIP 32 NORTH, RANGE 5 WEST, M.D.M. IN THE UNINCORPORATED TERRITORY OF SHASTA COUNTY, CALIFORNIA

PLANS PREPARED UNDER THE SUPERVISION OF:

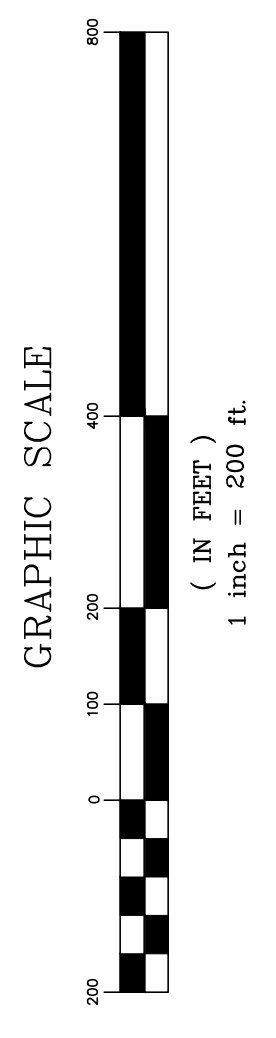
Shasta County
Crystal Creek Aggregate, Inc.

DUANE K. MILLER
CIVIL ENGINEER, INC.
800-965-6610
D:\ENGINEERING\Projects\065-250-026\065-250-026.dwg

DATE: 8/27/19
SHEET: 1
OF: 3



1. USE PERMIT EXISTING CONDITIONS
2. USE PERMIT SITE PLAN
3. USE PERMIT DETAILS

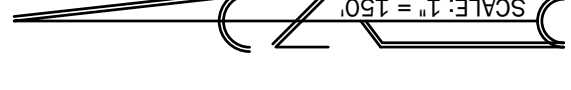


REVISIONS

NO.	DATE	DESCRIPTION	BY

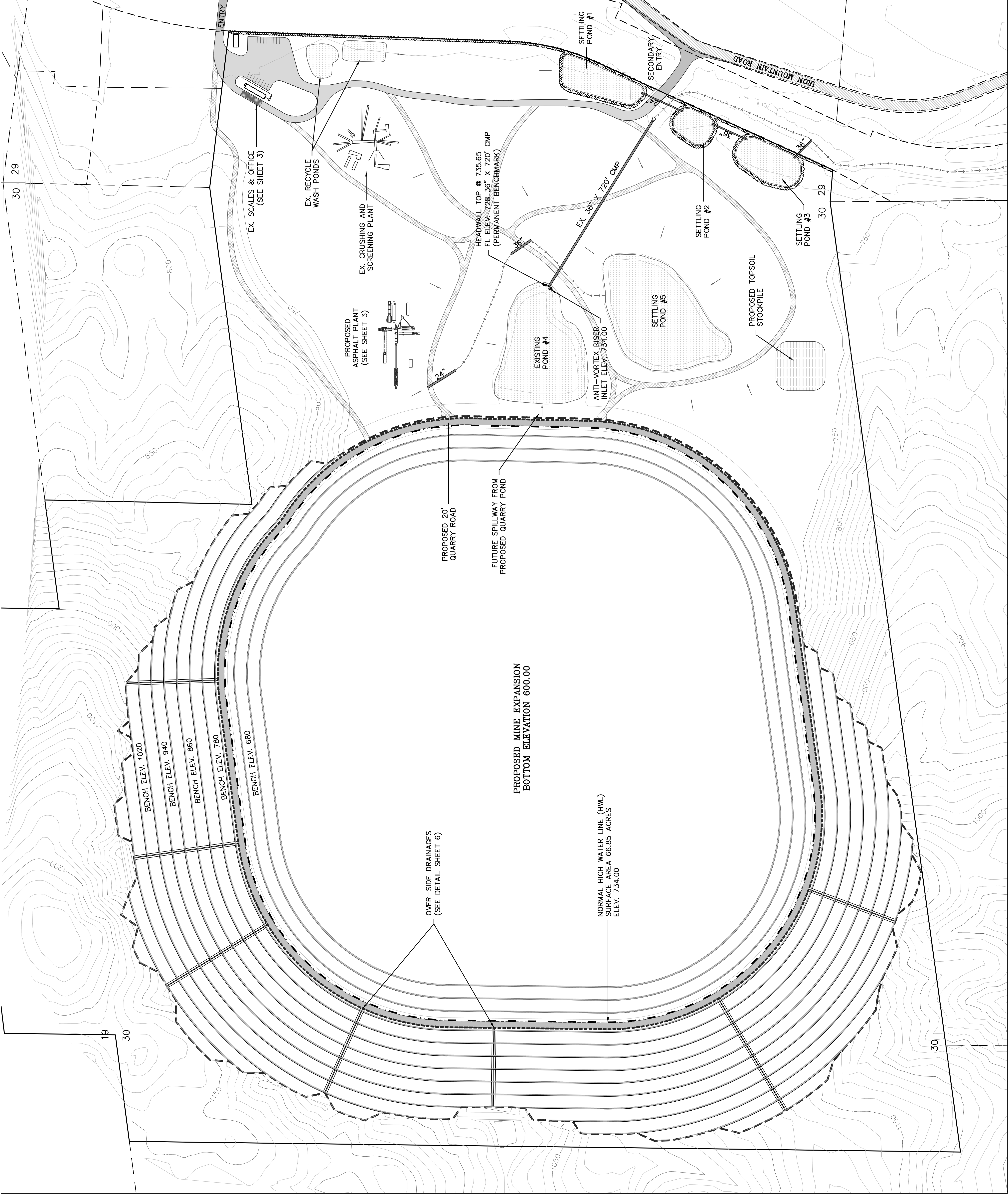
1-800-227-5600
PROJECT: 065-250-026

NO.	DATE	DESCRIPTION	BY



LEGEND	
	PROPERTY LINE
	ADJACENT PARCEL
	LIMITS OF QUARRY
	(EX) DRAINAGE COURSES
	(EX) CULVERT
	(N) BENCH LIP
	(N) HIGH WATER LINE
	10' FG CONTOUR
	(EX) 30' PROJECT ENTRY ROAD
	(EX) 30' ON-SITE DRIVEWAY & PARKING
	(EX) TRUCK ROUTE (20'-40' WIDE)
	(N) 20' QUARRY ROAD
	DRAINAGE ARROW

GRAPHIC SCALE
(IN FEET)
1 inch = 100 ft.



Shasta County
Crystal Creek Aggregate, Inc.
Use Permit Site Plan

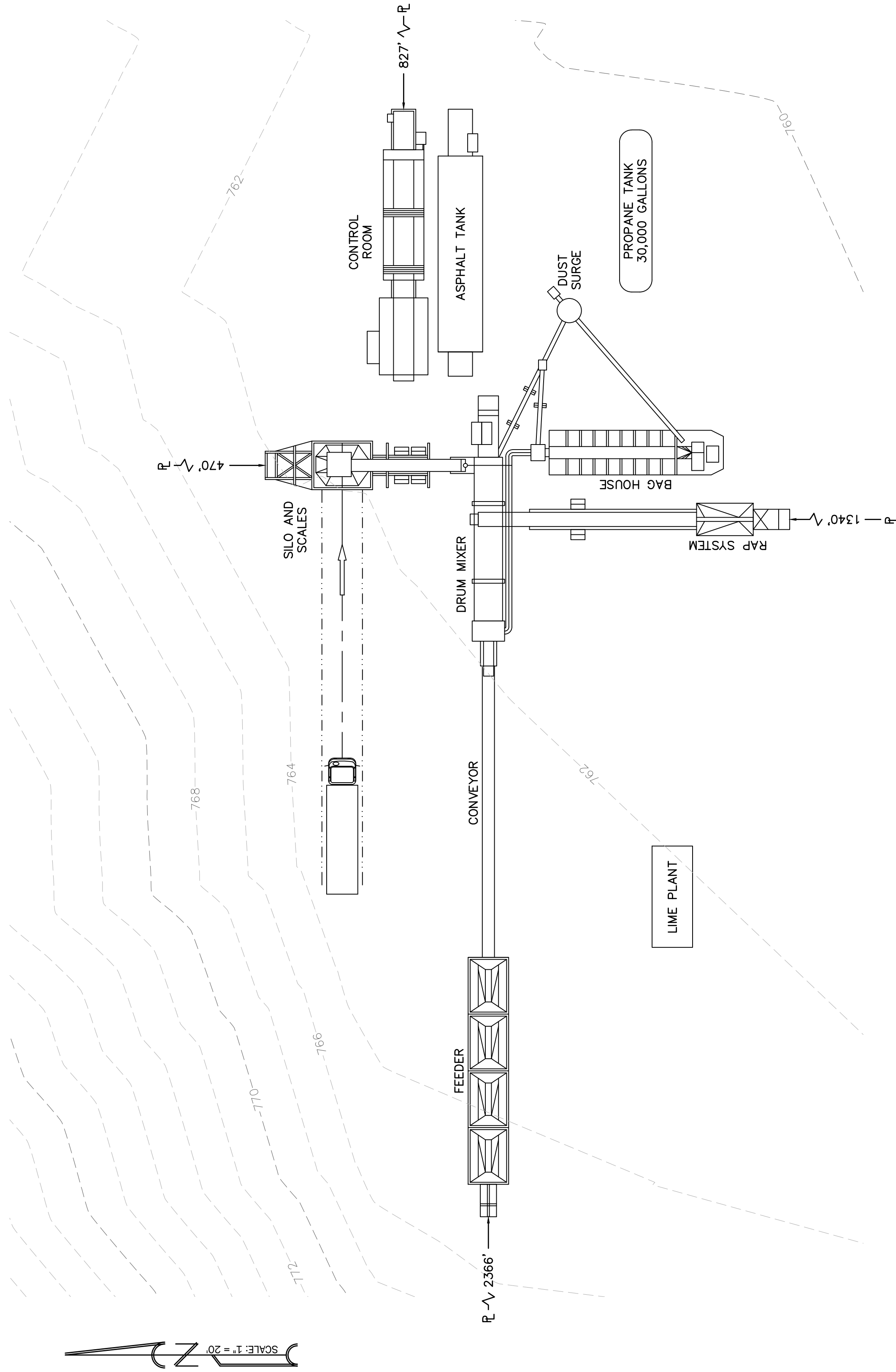
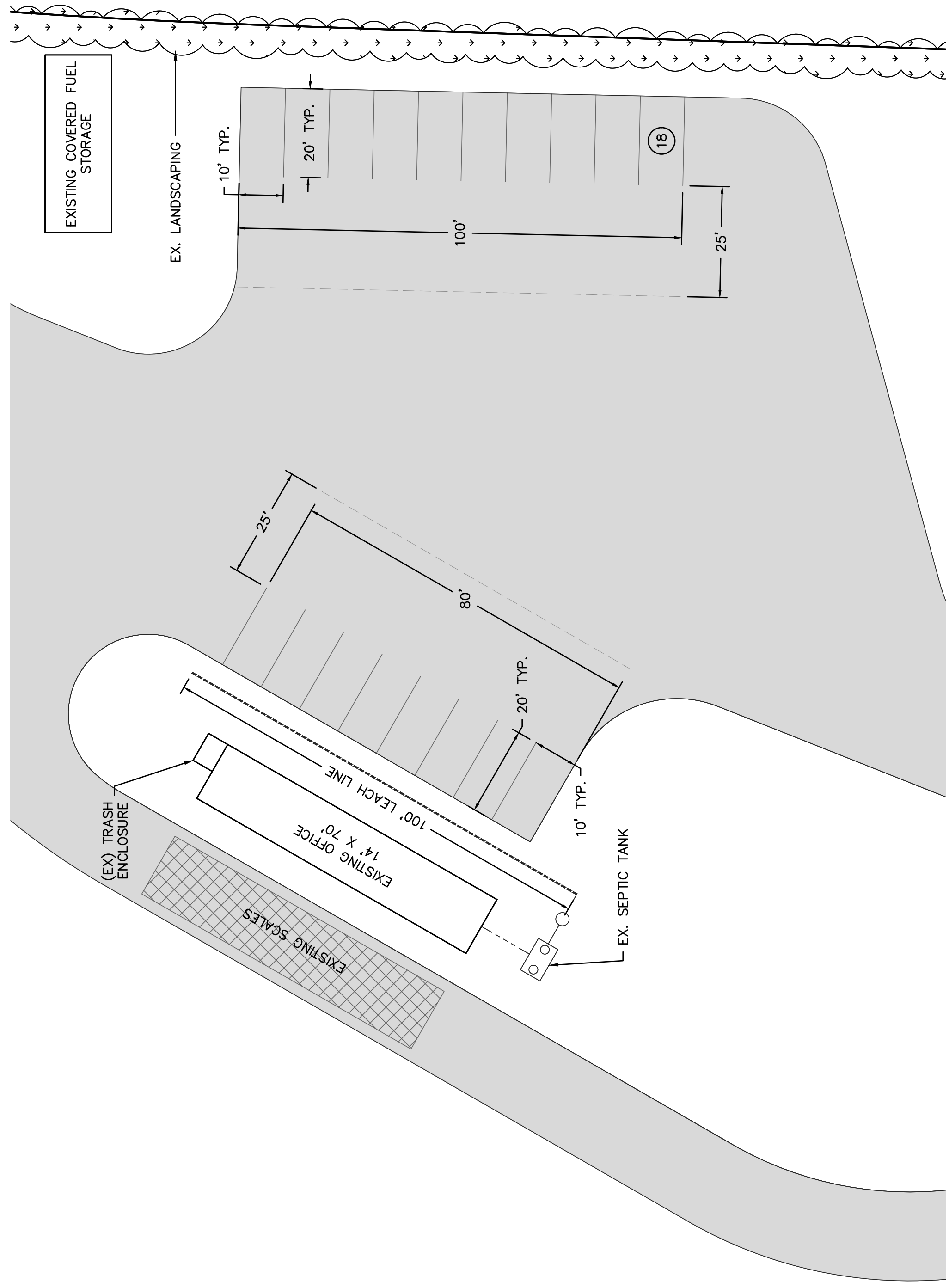
PLANS PREPARED UNDER THE SUPERVISION OF:

REGISTERED PROFESSIONAL ENGINEER
DIANE K. MILLER
No. 29490
STATE OF CALIFORNIA
CIVIL ENGINEERING

Shasta County	
Crystal Creek Aggregate, Inc.	
Use Permit Site Plan	
DATE	SHEET
03/05/2019	2
SCALE	OF
1" = 200'	3

North Arrow

1. THE LAYOUT SHOWN BELOW IS AN APPROXIMATION FOR PLANNING PURPOSES ONLY.
2. DIMENSIONS SHOWN ON THIS PLAN ARE APPROXIMATE DISTANCES.
3. LANDSCAPING IS COMPRISED OF REDWOOD GROVES 25' ON CENTER WITH OLEANDERS SPACED IN BETWEEN.
4. NO LANDSCAPING OR VEGETATION ALONG IRON MOUNTAIN ROAD.



SCALE: 1" = 20'

ND ENGINEERING
LLC

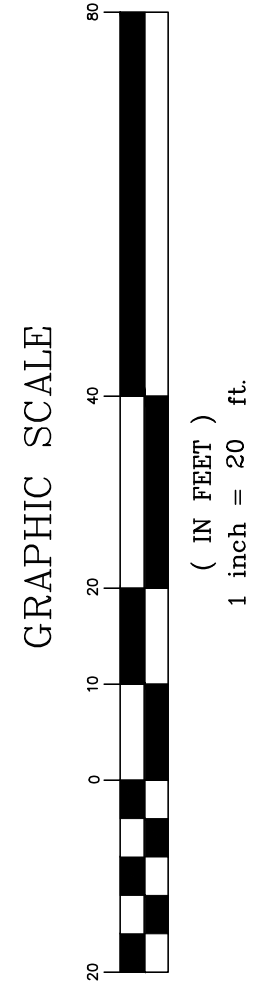


1-800-227-5600

ND ENGINEERING
LLC

REVISIONS

NO.	DATE	DESCRIPTION	BY

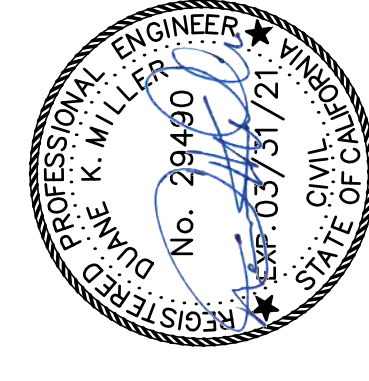


ND ENGINEERING
LLC

Shasta County
Crystal Creek Aggregate, Inc.

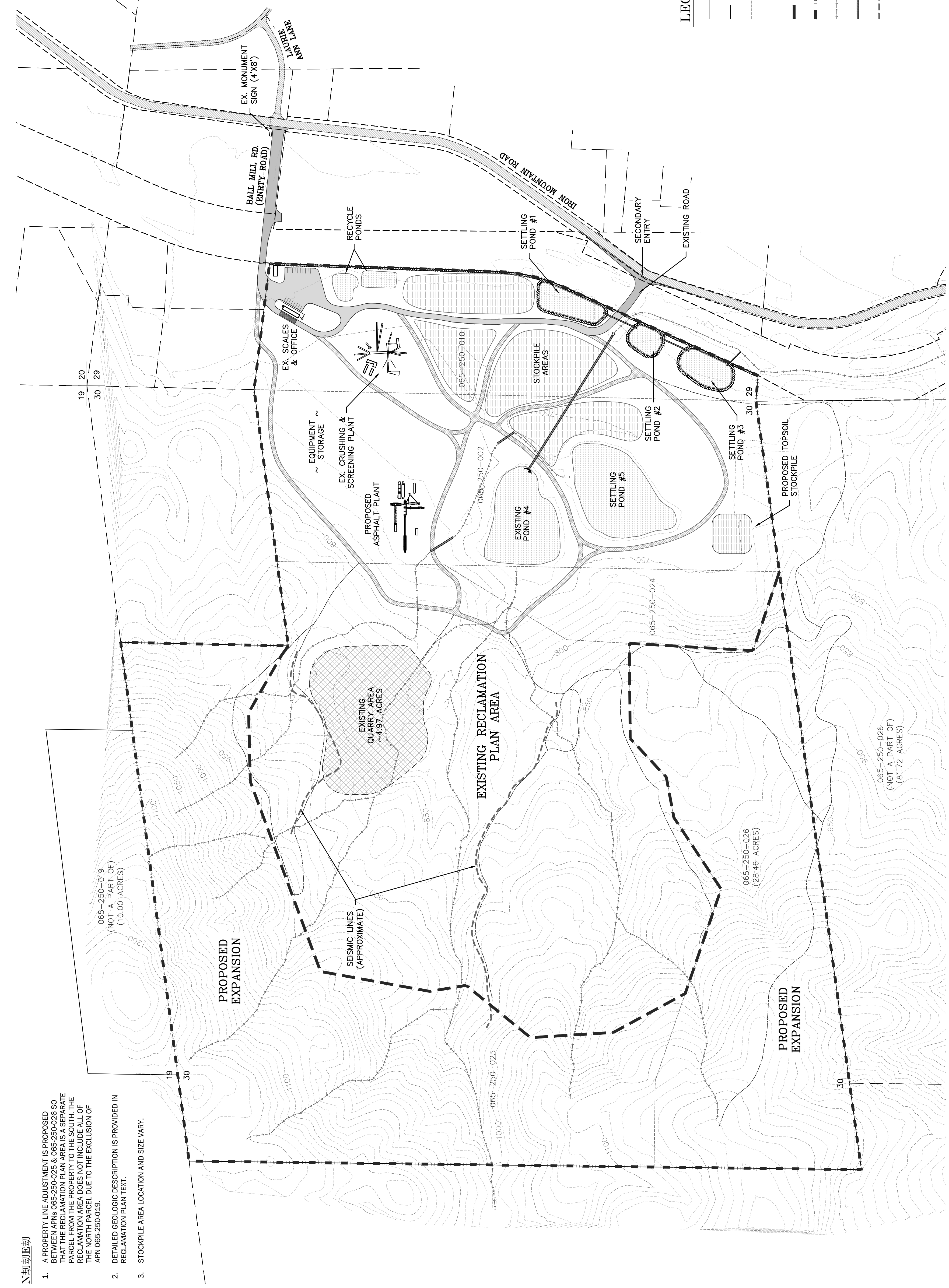
ND ENGINEERING LLC	DATE	SHEET
ND ENGINEERING LLC	ND ENGINEERING LLC	3
ND ENGINEERING LLC	SCALE	OF
ND ENGINEERING LLC	1" = 20'	3

PLANS PREPARED UNDER THE SUPERVISION OF:



NOTES

1. A PROPERTY LINE ADJUSTMENT IS PROPOSED BETWEEN APNS 065-250-025 & 065-250-026 SO THAT THE RECLAMATION PLAN AREA IS A SEPARATE PARCEL FROM THE PROPERTY TO THE SOUTH. THE RECLAMATION AREA DOES NOT INCLUDE ALL OF THE NORTH PARCEL DUE TO THE EXCLUSION OF APN 065-250-019.
2. DETAILED GEOLOGIC DESCRIPTION IS PROVIDED IN RECLAMATION PLAN TEXT.
3. STOCKPILE AREA LOCATION AND SIZE VARY.



PROPOSED EXPANSION

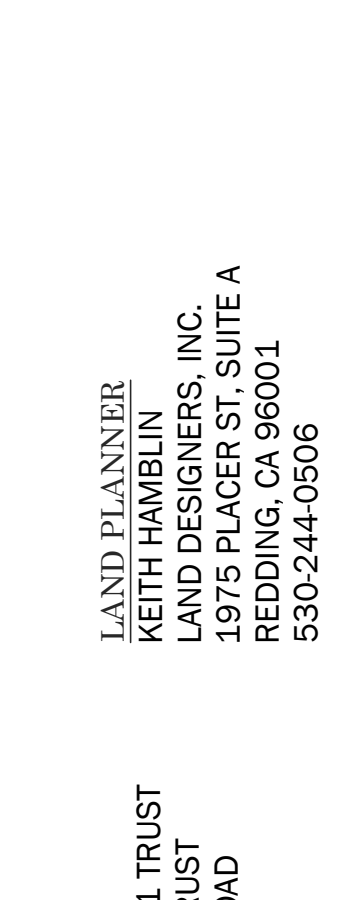
EXISTING RECLAMATION PLAN AREA

PROPOSED EXPANSION



SCALE: 1" = 200'

VICINITY MAP
NOT TO SCALE



OWNER
COMINGDEER FAMILY 2001 TRUST
JERRY DALE & KERRY M TRUST
10936 IRON MOUNTAIN ROAD
REDDING, CA 96001
(530) 224-7263

LAND PLANNER
KEITH HAMBLEN
LAND DESIGNERS, INC.
1975 PLACER ST., SUITE A
REDDING, CA 96001
530-244-0506

MINER OPERATOR
CRYSTAL CREEK AGGREGATE, INC.
10936 IRON MOUNTAIN ROAD
REDDING, CA 96001

ENGINEER
DUANE K. MILLER
CIVIL ENGINEER, INC.
PO BOX 1307
ANDERSON, CA 96007
(530) 365-5610

APN
065-250-002
065-250-024
065-250-025
065-250-026 (PORTION)
065-260-010

ACREAGE
EXISTING REC PLAN: 109.00 ACRES
AMENDED REC PLAN: 179.97 ACRES
PROPOSED EXPANSION: 70.97 ACRES

APN	AREA (ACRES)	EX. GENERAL PLAN	EX. ZONING
065-250-002	29.19	I-MR (Industrial; Interim Minerals)	M-IMR (General Industrial; Interim Mineral Resource)
065-250-024	6.74	MR (Mineral Resource)	MR (Mineral Resource)
065-250-025	98.48	MR (Mineral Resource)	MR (Mineral Resource)
PORTION OF 065-250-026	28.46	N-O (Open Space)	U (Unclassified District)
065-260-010	17.10	I-MR (Industrial; Interim Minerals)	M-IMR (General Industrial; Interim Mineral Resource)

LEGEND

- (EX) LANDSCAPING
- (EX) PONDS
- (EX) STOCKPILE AREAS
- (EX) QUARRY AREA
- (EX) 30' PROJECT ENTRY ROAD
- (EX) 30' ON-SITE DRIVEWAY & PARKING
- (EX) TRUCK ROUTE (20'-40' WIDE)
- (EX) UNIMPROVED SITE
- ACCESS TRAILS
- RECORD BOUNDARY
- ADJACENT BOUNDARY
- APN BOUNDARY
- 10' OG CONTOURS
- (EX) RECLAMATION BOUNDARY
- (N) RECLAMATION BOUNDARY
- (EX) DRAINAGE PATH
- (EX) CULVERT
- (EX) SEISMIC LINES (APPROXIMATE)

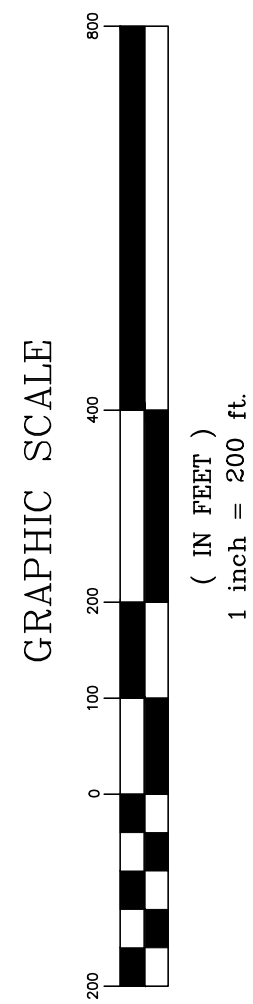
LOCATED IN SECTION 30, TOWNSHIP 32 NORTH, RANGE 5 WEST, M.D.M. IN THE UNINCORPORATED TERRITORY OF SHASTA COUNTY, CALIFORNIA

CRYSTAL CREEK AGGREGATE, INC.
MINE RECLAMATION PLAN

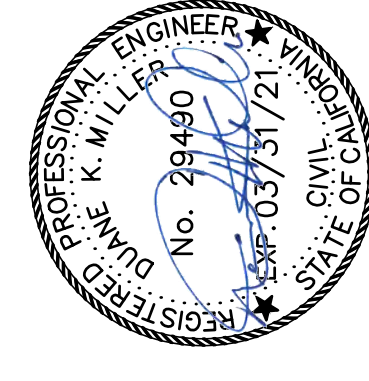
REVISIONS

NO.	DATE	DESCRIPTION	BY

MINING QUANTITIES
RECLAMATION AREA: 179.97 ACRES
AREA MINED: 110.49 ACRES
VOLUME: 37.29 MILLION C.Y.



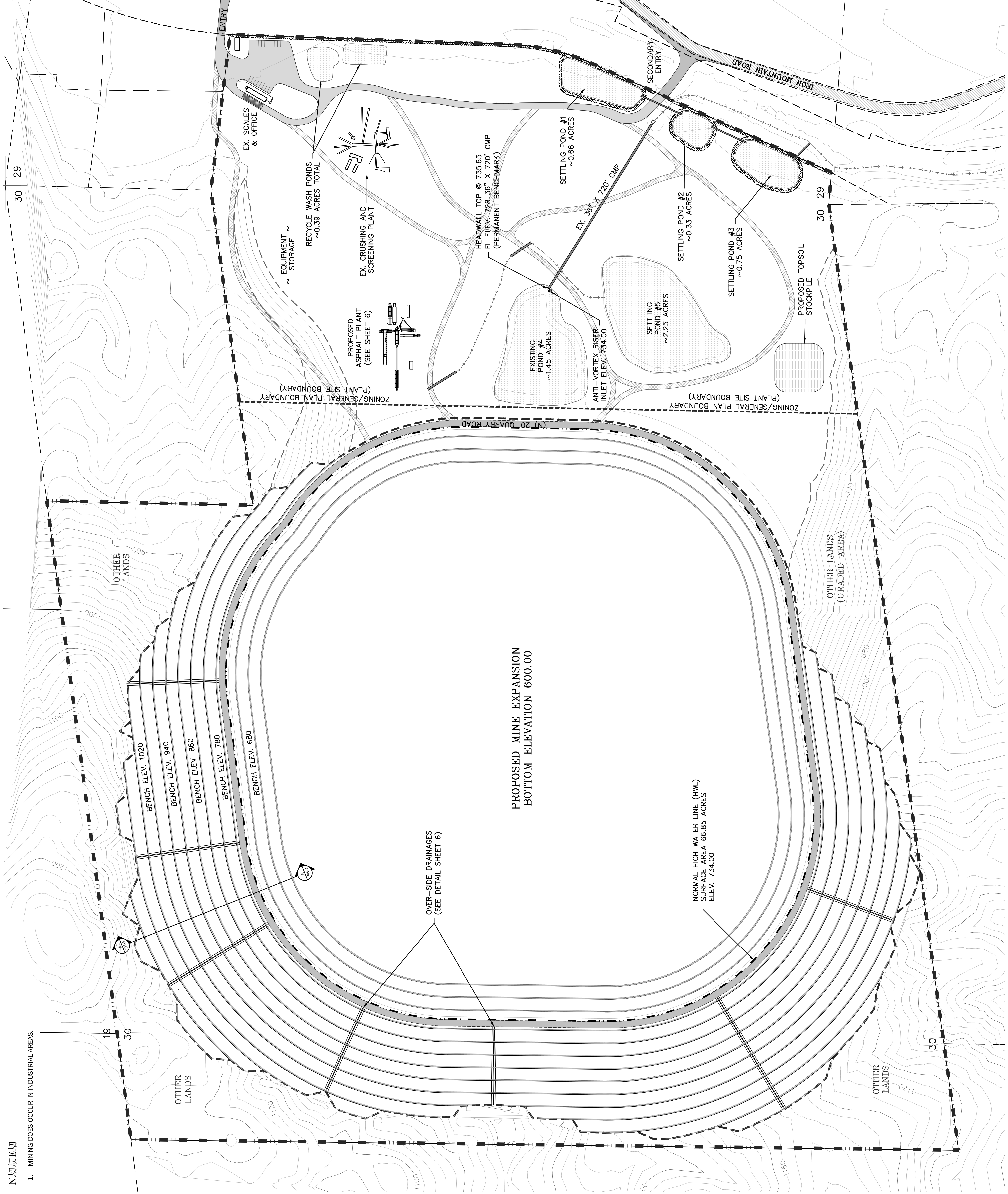
PLANS PREPARED UNDER THE SUPERVISION OF:



Shasta County
Crystal Creek Aggregate, Inc.
Cover Sheet
DUANE K. MILLER
CIVIL ENGINEER, INC.
DATE: 8/27/19
SHEET 1 OF 6

N 19 30

1. MINING DOES OCCUR IN INDUSTRIAL AREAS.



NO.	DATE	DESCRIPTION	BY

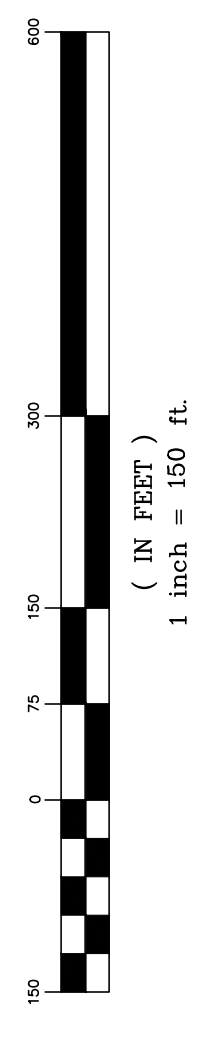


LEGEND

- PROPERTY LINE
- - - ADJACENT PARCEL
- REC PLAN BOUNDARY
- - - LIMITS OF QUARRY
- - - (EX) DRAINAGE PATH
- (EX) CULVERT
- - - (N) SLOPE TIE-IN
- - - (N) BENCH LIP
- - - (N) HIGH WATER LINE
- 10' FG CONTOUR
- (EX) 30' PROJECT ENTRY ROAD
- (EX) 30' ON-SITE DRIVEWAY & PARKING
- (EX) TRUCK ROUTE (20'-40' WIDE)
- - - (EX) UNIMPROVED SITE ACCESS TRAILS
- (N) 20' QUARRY ROAD

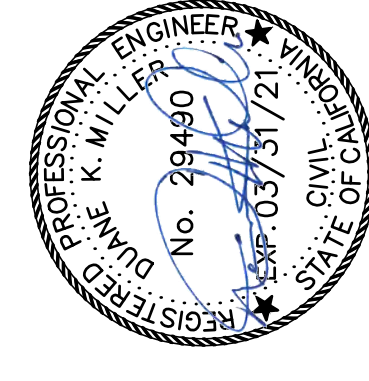
PLANT SITE & STOCKPILES:
 46.83 ACRES
QUARRY AREA:
 102.25 ACRES
OTHER LANDS:
 30.89 ACRES
TOTAL:
 179.97 ACRES

GRAPHIC SCALE



Shasta County
 Crystal Creek Aggregate, Inc.
 Mining Plan

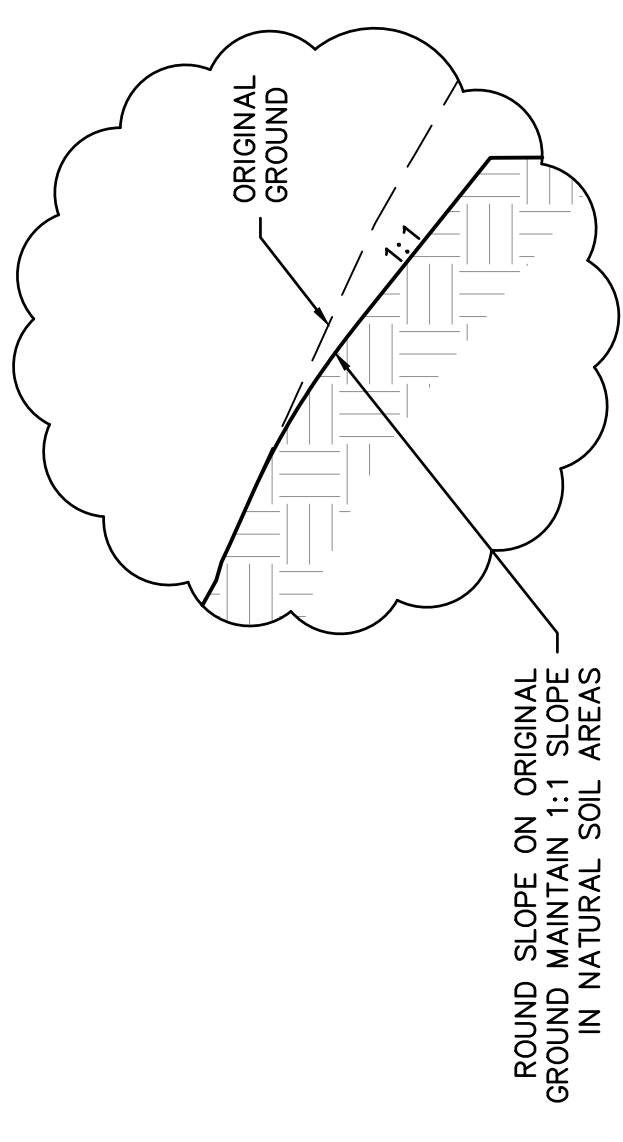
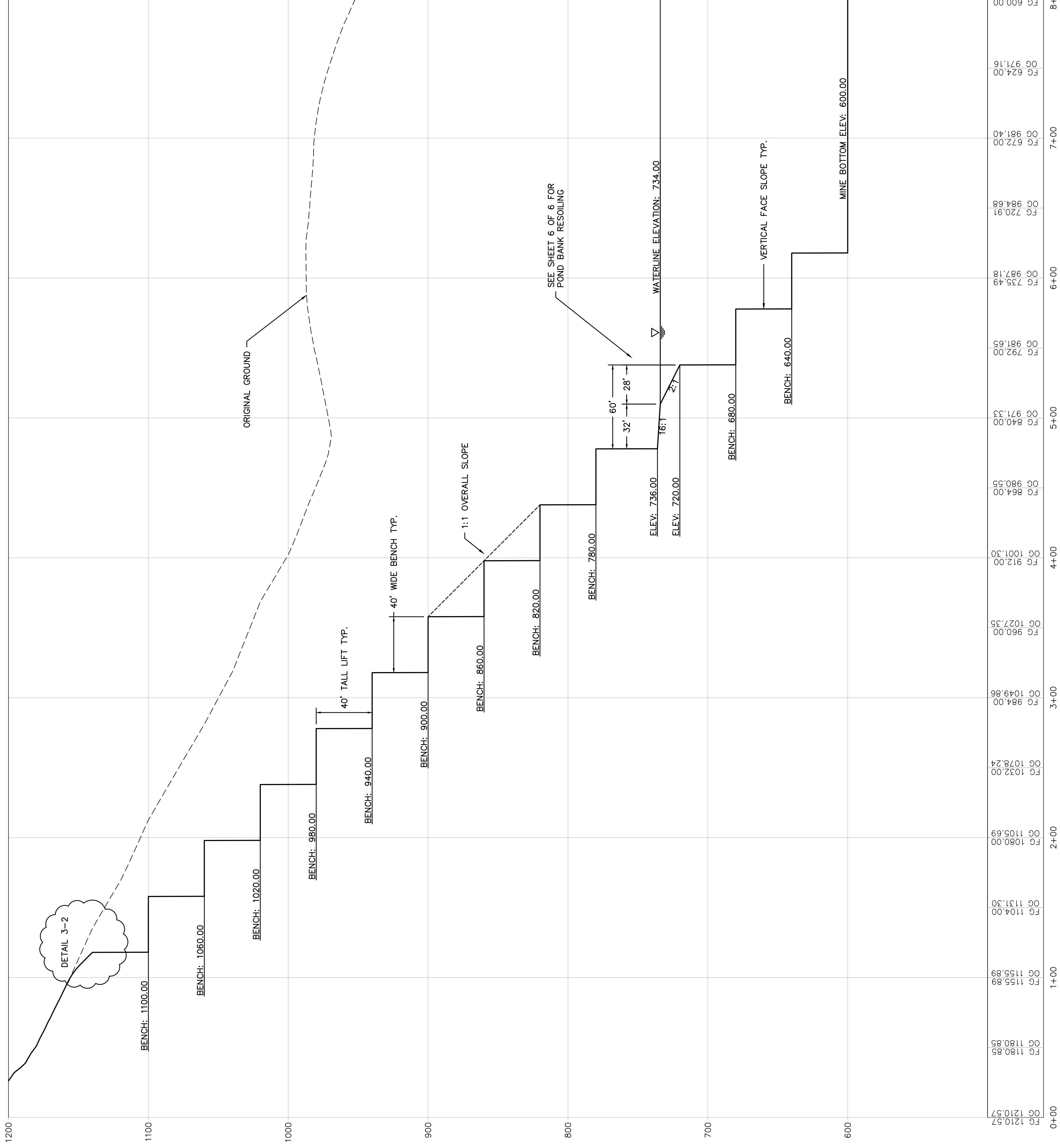
PLANS PREPARED UNDER THE SUPERVISION OF:



Crystal Creek Aggregate, Inc.	PROJECT	2
Mining Plan	SHEET	2
	OF	6
	SCALE	1" = 150'

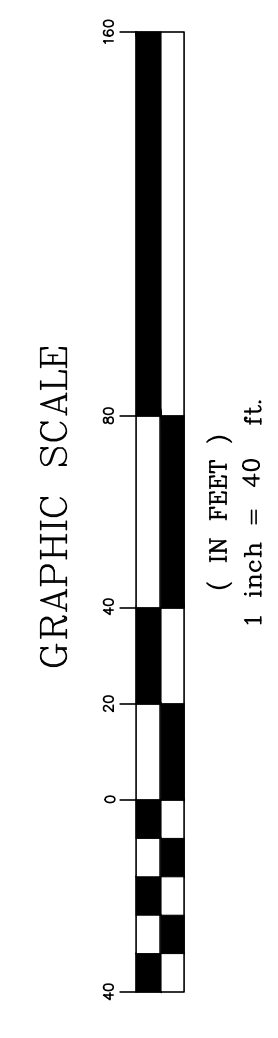
REVISIONS

NO.	DATE	DESCRIPTION	BY



NOTE:
PARENT MATERIAL TO DICTATE FINAL SLOPE.

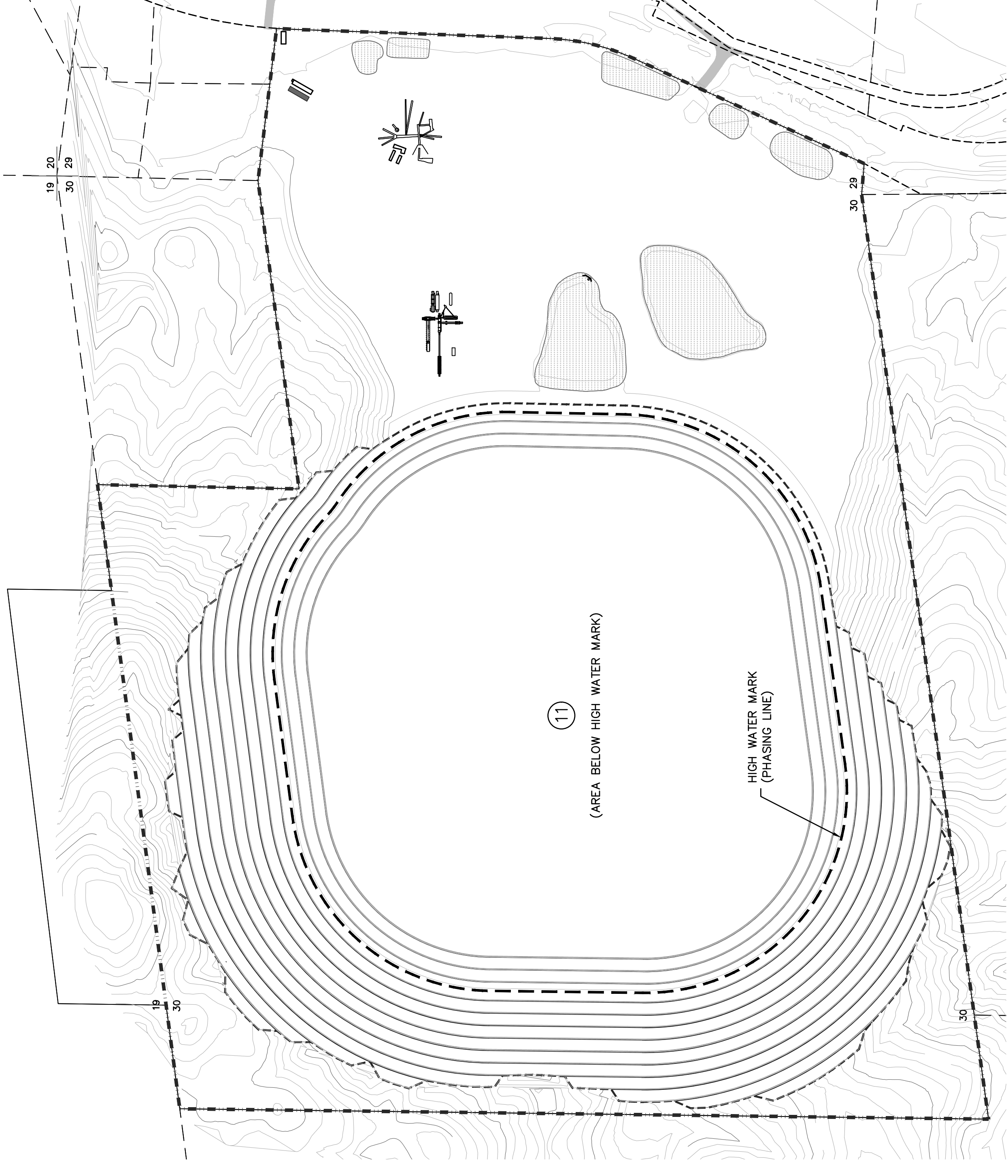
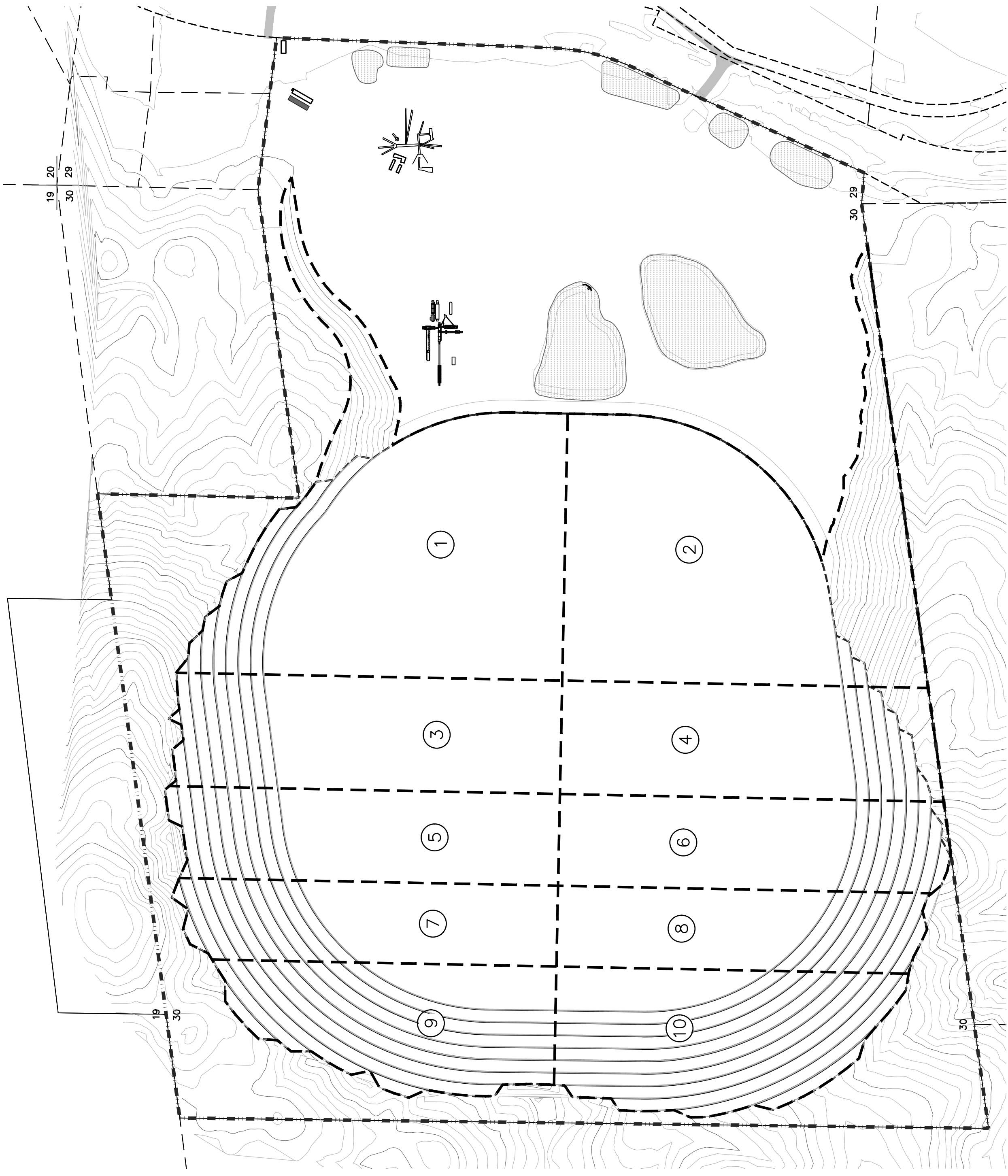
SCALE: 1"=20'



Shasta County
Crystal Creek Aggregate, Inc.
Cross Section A-A

PLANS PREPARED UNDER THE SUPERVISION OF:	
DESIGNED BY:	
PROJECT NO.:	SCALE:
SHEET	3
OF	6

SCALE: 1"=40'



LEGEND

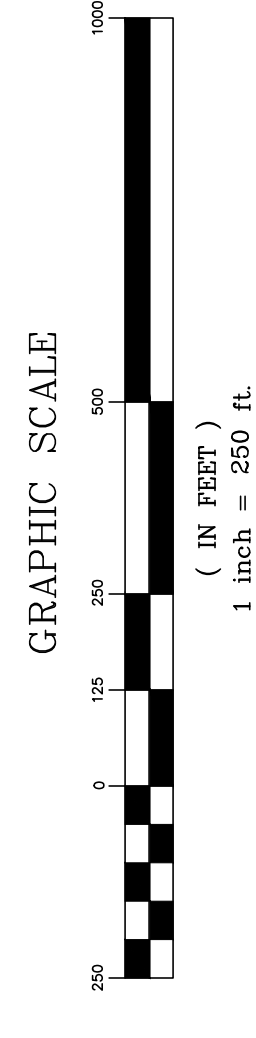
- PHASING BOUNDARY
- - - - REC PLAN BOUNDARY
- - - - ADJACENT PARCEL
- 10' FG CONTOURS
- 120
- - - - LIMITS OF QUARRY
- (N) BENCH LIP

PHASE QUANTITIES

PHASE	AREA (ACRES)	VOLUME (MCY)	CUMULATIVE (MCY)
1	20.48	2.68	2.68
2	20.10	2.77	5.45
3	10.36	2.29	7.75
4	10.10	2.27	10.02
5	8.32	2.30	12.31
6	8.44	2.72	15.03
7	7.13	2.15	17.18
8	6.98	2.79	19.97
9	8.56	1.80	21.77
10	10.04	2.94	24.71
11	66.79	12.59	37.29

REVISIONS

NO.	DATE	DESCRIPTION	BY



PLANS PREPARED UNDER THE SUPERVISION OF:



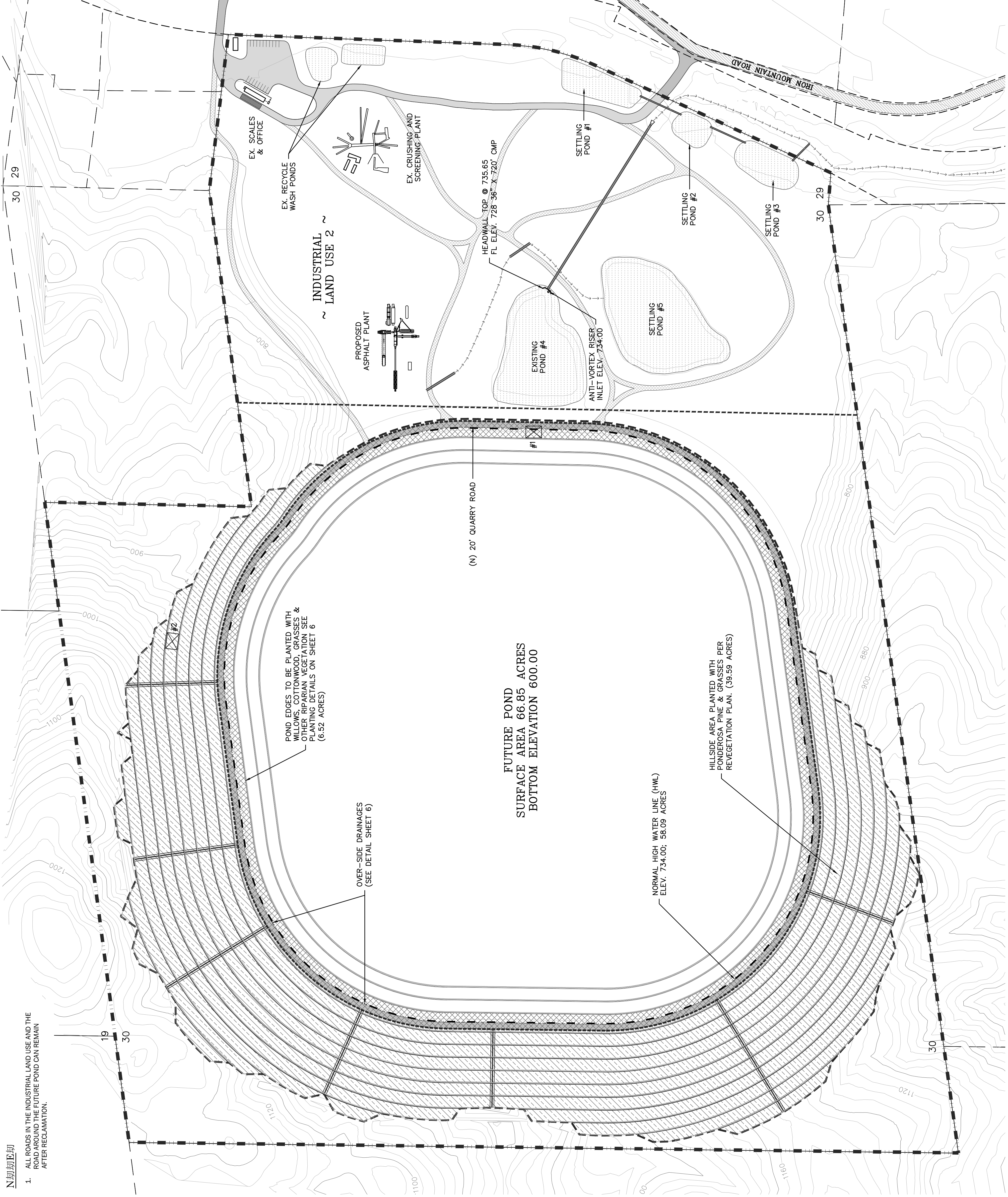
Shasta County
Crystal Creek Aggregate, Inc.

Phasing Plan

REGISTERED PROFESSIONAL ENGINEER DIANE K. MILES No. 29490 CIVIL ENGINEERING STATE OF CALIFORNIA	SHEET 4 OF 6
---	-------------------------------------

却却END却却却却却
 却却L却却却却却却却却却
 N却却却却却却却却却

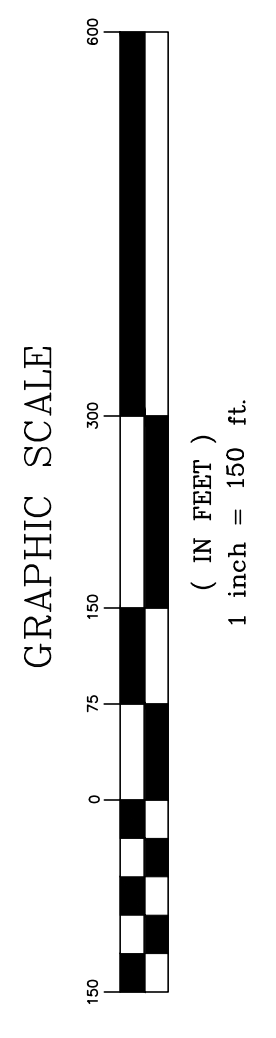
NO.	DATE	DESCRIPTION	BY



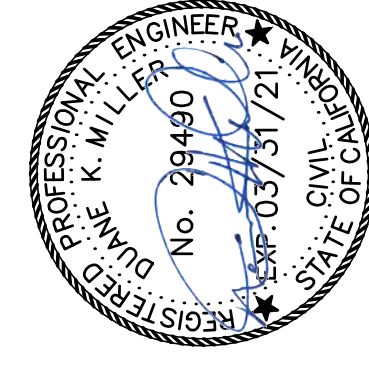
1. ALL ROADS IN THE INDUSTRIAL LAND USE AND THE ROAD AROUND THE FUTURE POND CAN REMAIN AFTER RECLAMATION.



- LEGEND**
- PROPERTY LINE
 - - - ADJACENT PARCEL
 - REC PLAN BOUNDARY
 - - - LIMITS OF QUARRY
 - RIPARIAN PLANTING BOUNDARY
 - - - HIGH WATER LINE
 - 10' FG CONTOUR
 - ▨ POND EDGE PLANTING (6.52 ACRES)
 - ▩ BENCH REVEGETATION (35.59 ACRES)
 - ⊠ REVEGETATION TEST PLOT



PLANS PREPARED UNDER THE SUPERVISION OF:



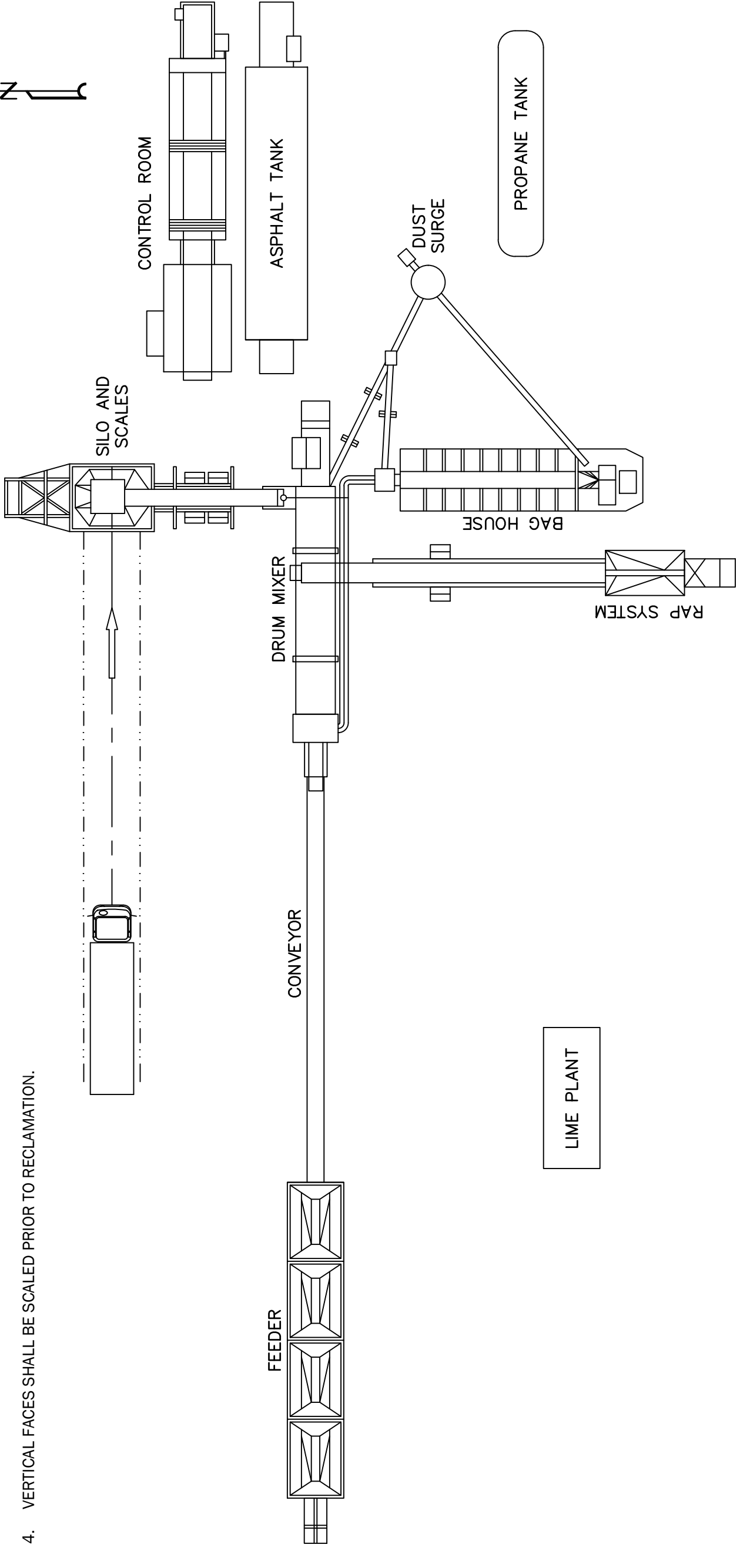
Shasta County	
Crystal Creek Aggregate, Inc.	
Reclamation Plan	
DATE	SHEET
NO. 29490	5
SCALE	OF
1" = 150'	6

1. SLOPES AND BENCHES WILL VARY BASED ON GEOLOGY AND FIELD CONDITIONS. REFER TO GEOTECHNICAL REPORT.

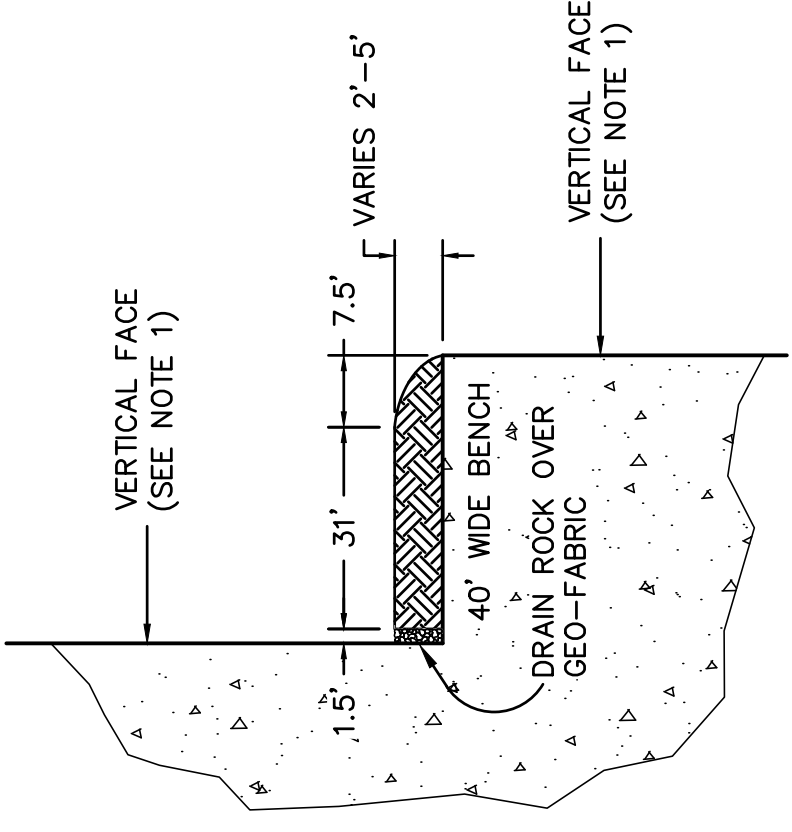
2. ASPHALT PLANT CAPACITY TO BE APPROXIMATELY 400 TONS/HOUR.

3. FINAL LAYOUT AND TRUCK ROUTES FOR ASPHALT PLANT TO BE DETERMINED.

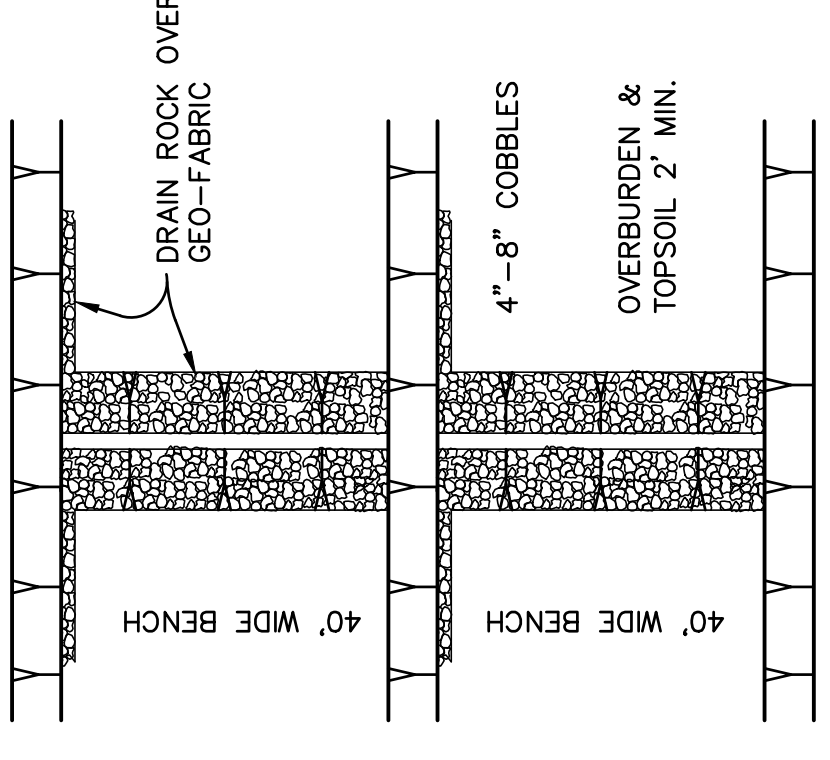
4. VERTICAL FACES SHALL BE SCALED PRIOR TO RECLAMATION.



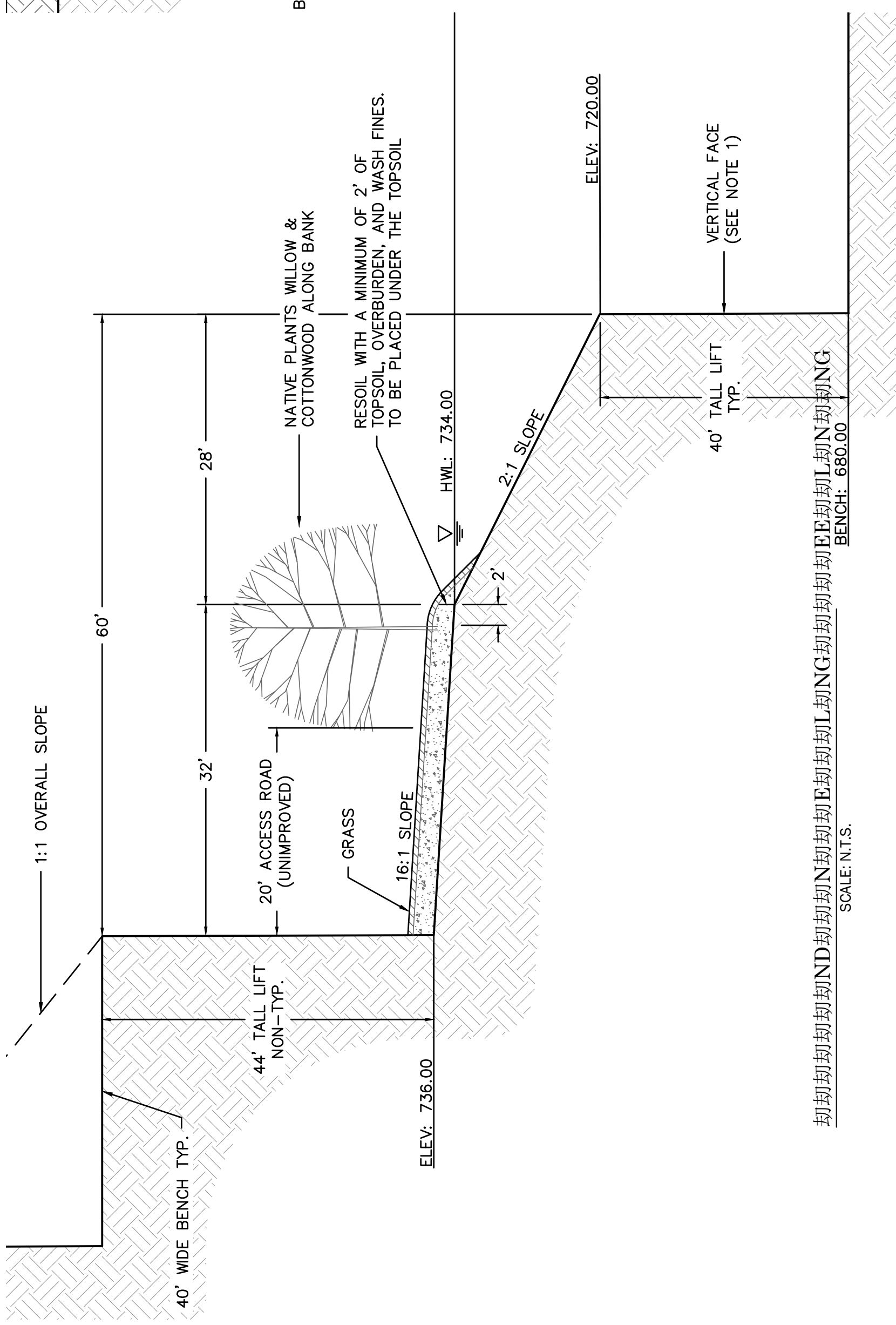
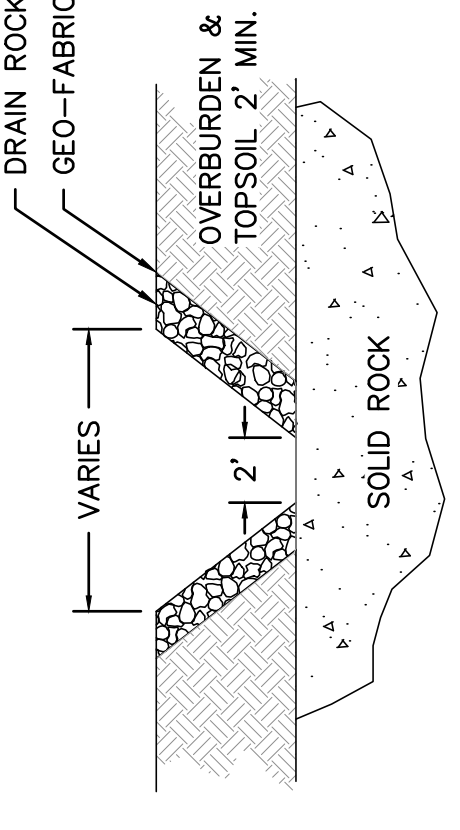
SCALE: 1" = 20'



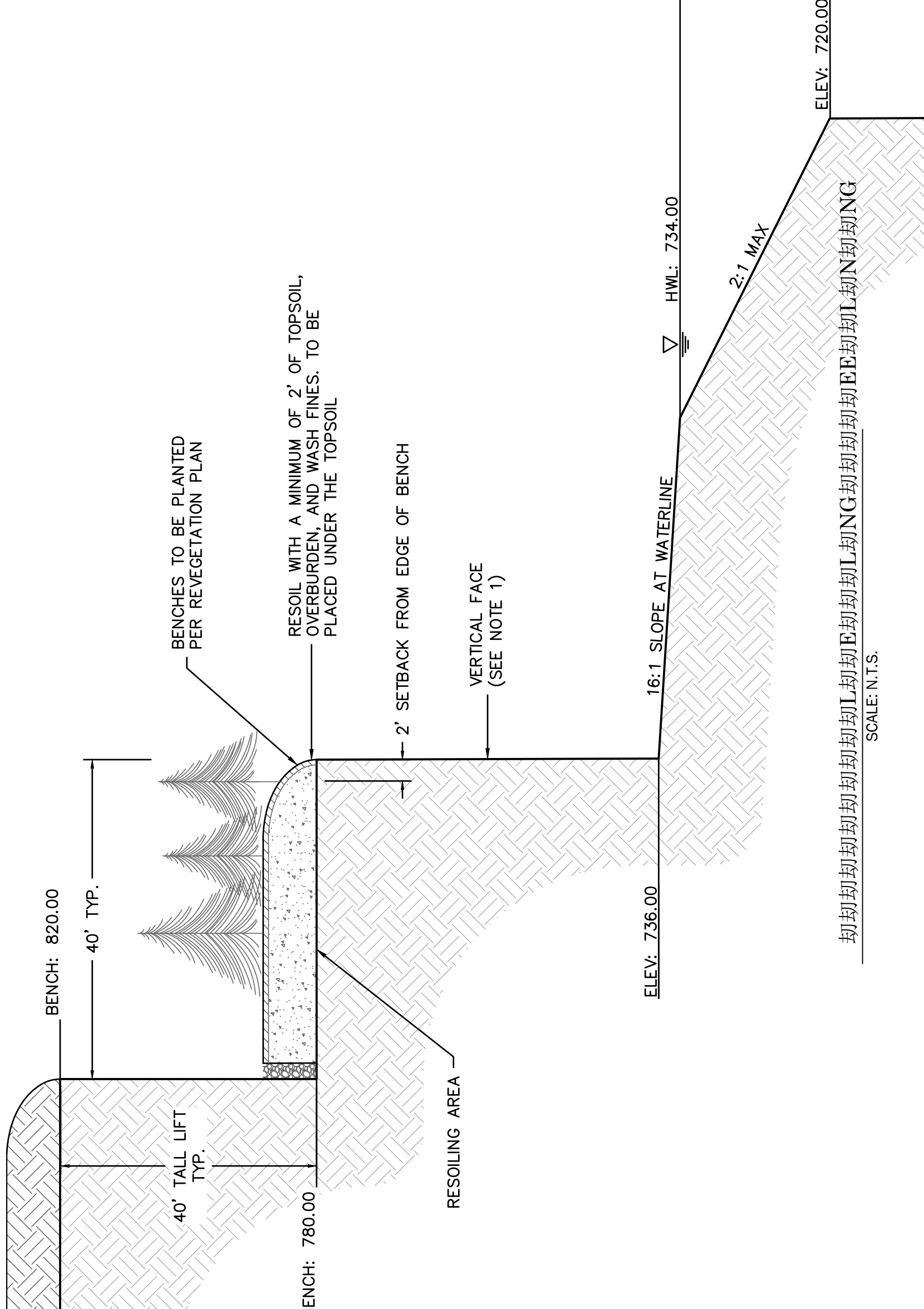
SCALE: N.T.S.



SCALE: N.T.S.



SCALE: N.T.S.

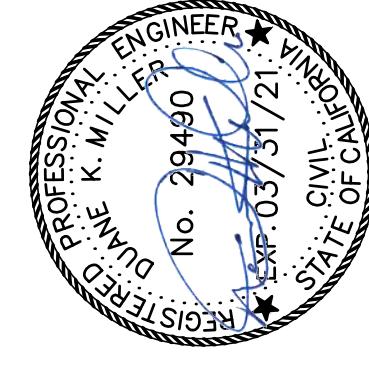


SCALE: N.T.S.

REVISIONS

NO.	DATE	DESCRIPTION	BY

PLANS PREPARED UNDER THE SUPERVISION OF:



Shasta County
Crystal Creek Aggregate, Inc.

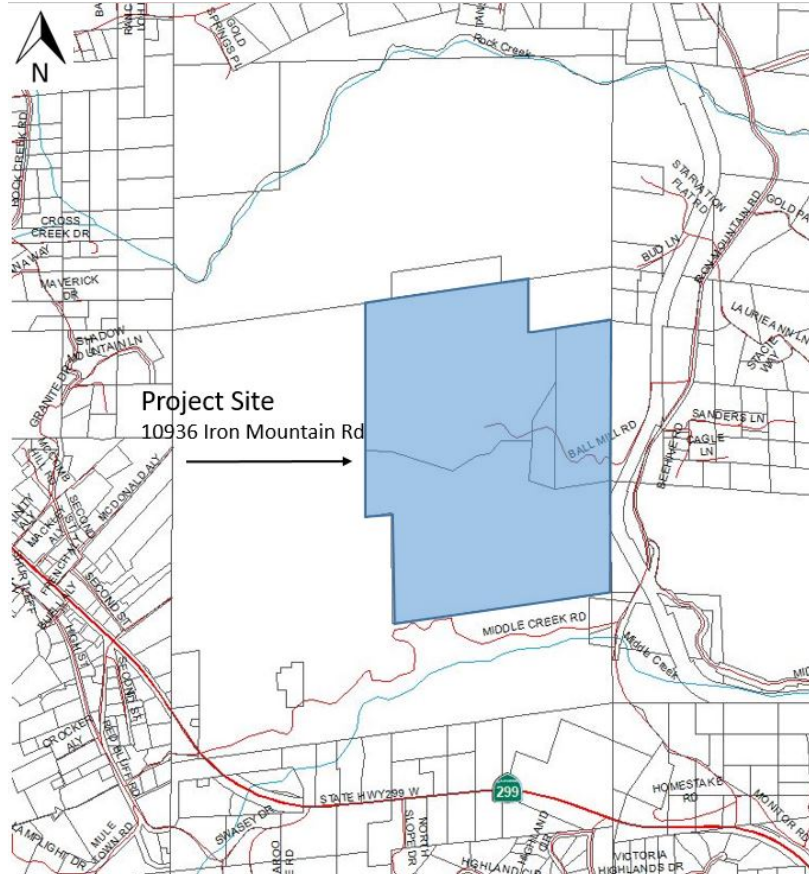
PROJECT: RECLAMATION OF EXCAVATION AT ASPHALT PLANT
SHEET: 6 OF 6
SCALE: 1" = 150'

Appendix 5.2
2019 Scoping Meeting Materials

Meeting Notice

**NOTICE OF PUBLIC EIR SCOPING MEETING
AND REQUEST FOR WRITTEN SCOPING COMMENTS
REGARDING THE CRYSTAL CREEK AGGREGATES EXPANSION PROJECT**

PROJECT TITLE: Crystal Creek Aggregate Expansion Project (General Plan Amendment 19-0003, Zoning Plan Amendment 19-0002, Use Permit Amendment 19-0007, and Reclamation Plan Amendment 19-0001) **APPLICANT:** Crystal Creek Aggregate Inc. 10936 Iron Mountain Road Redding, CA 96001. **PROJECT LOCATION:** The project site is located on an existing quarry located in the community of Keswick, on the west side of Iron Mountain Road, approximately 1.5 miles north of the intersection of Iron Mountain Road and State Highway 299 West. The project site includes Assessor's Parcel numbers 065-250-002-000, 065-250-024-000, 065-250-025-000, 065-250-026-000, 065-260-010-000.



Shasta County is the Lead Agency under the California Environmental Quality Act (CEQA), and is preparing an Environmental Impact Report (EIR) for the project identified as the Crystal Creek Aggregate Expansion Project. Crystal Creek Aggregate, Inc. proposes to expand their existing aggregate mining operation and add an asphalt batch plant. The project would expand an approved mining use permit area of 110.24 acres and an approved reclamation plan area of 108.87 acres to 179.97 acres. The project would require a General Plan amendment from Natural Resource Protection-Open Space (N-O) to Mineral Resource (MR), and a Zoning Plan amendment from Unclassified (U) to Mineral Resource (MR).

The purpose of the scoping meeting is to solicit guidance as to the scope and content of the EIR, including potential environmental impacts of concern and mitigation measures or alternatives that should be considered.

The probable environmental effects of the project include, but are not limited to, aesthetics, biological resources, greenhouse gas emissions, land use, traffic, forestry resources, cultural resources, hazards & hazardous materials, public services, tribal cultural resources, air quality, geology/soils, hydrology/water quality, noise, and utilities/services systems. A detailed project description is included in the Notice of Preparation filed with the California State Clearinghouse on September 30, 2019. The Notice of Preparation of an EIR can be reviewed at:

<https://www.co.shasta.ca.us/docs/libraries/resource-management-docs/eir/crystal-creek-aggregate/nopclearinghousemailer.pdf>

A copy of the Notice of Preparation can also be reviewed or obtained at the Shasta County Dept. of Resource Management, Planning Division located at 1855 Placer Street, Suite 103, Redding, CA 96001.

PUBLIC SCOPING MEETING NOTICE: Shasta County will hold a public scoping meeting for agencies and individuals to learn more about the CEQA process for this project, and to receive comments about the scope and content of the EIR, including what potential environmental impacts of the project should be addressed in depth in the EIR. The merits of the project will not be discussed at this meeting, nor will comments regarding approval or denial of the project. No decision to approve or deny the project will be made at this meeting. The meeting will be held Friday November 1, 2019 at 9:00 AM, in the Shasta County Department of Public Works Conference Room, located at 1855 Placer Street.

WRITTEN SCOPING COMMENTS: The written scoping comment period for this project is extended until Friday November 8, 2019. Send all direct questions and all written comments to the project contact, Tara Petti, Assistant Planner, at the Shasta County Department of Resource Management, Planning Division, 1855 Placer Street, Suite 103, Redding, CA 96001, or via e-mail at tpetti@co.shasta.ca.us. Ms. Petti may be contacted for additional information at (530) 225-5532.

Comment Card



SCOPING SUGGESTIONS/COMMENTS

CRYSTAL CREEK AGGREGATE EXPANSION PROJECT EIR
(GPA 19-0003, Zone Amendment 19-0002, UP 19-0007, Reclamation Plan 19-0001)

PUBLIC COMMENT PERIOD: September 30 – November 8, 2019
COMMENT DEADLINE: November 8, 2019 at 5:00 p.m.

NOTE: Name, address and phone number are not required in order to provide a comment. You are not limited to utilizing this comment card and comments may be submitted to the County in any written manner.

Name:

Agency (if applicable):

Mailing Address:

Phone Number:

Email:

Comments (continue on back):

Submit this card or other written comments to:

SHASTA COUNTY
Department of Resource Management
Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001
Attention: Tara Petti, Assistant Planner
Email: tpetti@co.shasta.ca.us

Comments (continued): _____

Sign-In Sheet



CRYSTAL CREEK AGGREGATE EXPANSION PROJECT EIR
 (GPA 19-0003, Zone Amendment 19-0002, UP 19-0007, Reclamation Plan 19-0001)

SIGN-IN SHEET

SCOPING MEETING
 November 1, 2019
 9:00 AM

SHASTA COUNTY
 DEPARTMENT OF RESOURCE MANAGEMENT
 Public Works Conference Room
 1855 Placer Street
 Redding, CA 96001

	NAME	ADDRESS	PHONE	E-MAIL
1.	Bruce Greese	SJND Redding Mt. Rd CA	530.221.5424	lgreese@sjm-tyng.com
2.	Kurt Schummeier	11052 Iron Mt. Rd	530 246-7740	
3.	Nydia Schummeier	11052 Iron Mountain Rd	530-227-1437	nschummeier@ax.com
4.	Diego P. Ortega	11052 Iron Mountain Rd.	530-215-5417	
5.	John Deaton	825 Leisha Lane	530.238.7005	longeye@hotmail.com
6.	Keith Haele-	10525 Red Alameda Rd.	530-524-5481	
7.	Bonnie Lampley	444 3590 Iron Ct. Shastalake	530-275-4800	blampley@lurne.com
8.	Russ Wenhams	GHD	530 242 1700	russ.wenhams@ghd.com Ayla Tucker @ yahoo.com
9.	Ayla Tucker	10893 granite Dr.	530-404-0192	
10.	Jerry Emery	10936 Iron Mt. Rd	530 244-2265	jerry@crystalcreekaggregate.com
11.	Rob Dellamonica	11028 Bud Ln.	530-949-8583	robbydellamonica@gmail.com

	NAME	ADDRESS	PHONE	E-MAIL
12.	Sandi Sharer	3404 Cessna Dr, Redding 96001	530-949-0039	bradand sandie charter, inc
13.	DUANE MILLER	P.O. Box 1807 Alder	96007 530-565 5610	DUANE @ DVM514R.COM
14.	ELIHAWD DIAZ	DVAZ ASSOCIATES 4277 PATTERSON CT REDDING 96003	224-0811	DVAZ@DVAZ.COM
15.	Paul Hellman	Shasta County		
16.	Tara Petti	Shasta County		
17.	Alysa Frieseler	Shasta County		
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Appendix 5.3
Comment Letters Received in Response to 2019 NOP

Government Agencies

From: Phillips, Ashley [<mailto:amphillips@blm.gov>]
Sent: Tuesday, October 29, 2019 2:15 PM
To: Lio Salazar <lsalazar@co.shasta.ca.us>
Subject: Fwd: BLM Interested Agency for Clear Creek

Hello Lio Salazar,

In response to notice of the [NOP for the EIR](#), please keep Charles Wright and Ashley Phillips as point of contacts for the BLM.

Charles Wright, Supervisory Realty Specialist

BLM Redding Field Office
6640 Lockheed Drive
Redding, CA 96002
cwright@blm.gov
530-224-2120

Ashley Phillips, Planning & Environmental Specialist

BLM Redding Field Office
6640 Lockheed Drive
Redding, CA 96002
amphillips@blm.gov
530-224-2140

While the BLM is not responsible or trustee, we are an interested agency and would like to receive updates regarding this project. Initial concerns may include an adjoining archeological site (The Kett Site), visual impacts, spread of non-native invasive species (indirect impact), and increased noise and fugitive dust.

Thank you for notice of the scoping meeting this Friday at 9:00A.M.

Regards,

--

Ashley M. Phillips

Planning & Environmental Specialist
U.S. Department of the Interior | Region 10
Bureau of Land Management - Redding Field Office
6640 Lockheed Drive
Redding, CA 96002

Phone: 530-224-2140

Email: amphillips@blm.gov

<https://www.blm.gov/>

NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department

1550 Harbor Blvd., Suite 100

West Sacramento, CA 95691

Phone: (916) 373-3710

Email: nahc@nahc.ca.govWebsite: <http://www.nahc.ca.gov>

Twitter: @CA_NAHC



October 29, 2019

Tana Petti
Shasta CountyVIA Email to: TPetti@co.shasta.ca.usRE: Native American Consultation, Pursuant to Senate Bill 18, Government Code §65352.3 and §65352.4,
Crystal Creek Aggregate Expansion Project EIR (GPA 19-003), Shasta County

Dear Ms. Petti:

Attached is a consultation list of tribes with traditional lands or cultural places located within the boundaries of the above referenced counties.

Government Code §65352.3 and §65352.4 require local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places when creating or amending General Plans, Specific Plans and Community Plans.

The law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction. The NAHC believes that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

The NAHC also believes that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:
 - A listing of any and all known cultural resources that have already been recorded or are adjacent to the APE, such as known archaeological sites;
 - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
 - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the APE; and
 - If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:
 - Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code §6254.10.
3. The result of the Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was positive. Please contact the Redding Rancheria on the attached list for more information.
4. Any ethnographic studies conducted for any area including all or part of the APE; and
5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event, that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we are able to assure that our consultation list remains current.

If you have any questions or need additional information, please contact me at my email address:
Nancy.Gonzalez-Lopez@nahc.ca.gov.

Sincerely,



Nancy Gonzalez-Lopez
Staff Services Analyst

Attachment

**Native American Heritage Commission
Tribal Consultation List
Shasta County
10/29/2019**

Redding Rancheria

Jack Potter, Chairperson
2000 Redding Rancheria Road Pit River
Redding, CA, 96001 Wintu
Phone: (530) 225 - 8979 Yana
Fax: (530) 241-1879
melodieh@redding-rancheria.com

Winnemem Wintu Tribe

Caleen Sisk, Chief
14840 Bear Mountain Road Wintu
Redding, CA, 96003
Phone: (530) 229 - 4096
caleenwintu@gmail.com

***Wintu Tribe of Northern
California***

Wade McMaster, Chairperson
P.O. Box 995 Wintu
Shasta Lake, CA, 96019
Phone: (530) 605 - 1726
Fax: (530) 605-1727
wintu.tribe1@gmail.com

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 6097.98 of the Public Resources Code and section 5097.98 of the Public Resources Code.

This list is only applicable for consultation with Native American tribes under Government Code Sections 65352.3 and 65352.4 et seq for the proposed Crystal Creek Aggregate Expansion Project EIR (GPA 19-003), Shasta County.



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



October 29, 2019

Lio Salazar, Senior Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001

Subject: Review of the Notice of Preparation for the Crystal Creek Aggregates Expansion Project, General Plan Amendment 19-0003, Zoning Plan Amendment 19-0002, Use Permit Amendment 19-0007, and Reclamation Amendment Plan 19-0001, State Clearinghouse Number 2019090702, Shasta County

Dear Mr. Salazar:

The California Department of Fish and Wildlife (Department) has reviewed the Notice of Preparation (NOP) of the Draft Environmental Impact Report (DEIR) for the above-referenced project (Project) dated August 28, 2019. The Department appreciates this opportunity to comment on the Project, relative to impacts to biological resources.

The Department is a Trustee Agency pursuant to the California Environmental Quality Act (CEQA). As the Trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants and their habitat necessary for biologically sustainable populations of those species (Fish & G. Code §§ 1801 and 1802). As the Trustee Agency for fish and wildlife resources, the Department provides requisite biological expertise to review and comment upon CEQA documents and makes recommendations regarding those resources held in trust for the people of California.

The Department may also assume the role of Responsible Agency. A Responsible Agency is an agency other than the Lead Agency that has a legal responsibility for carrying out or approving a project. A Responsible Agency actively participates in the Lead Agency's CEQA process, reviews the Lead Agency's CEQA document and uses that document when making a decision on a project. The Responsible Agency must rely on the Lead Agency's CEQA document to prepare and issue its own findings regarding a project (CEQA Guidelines §§ 15096 and 15381). The Department most often becomes a Responsible Agency when a Lake or Streambed Alteration Agreement (Fish & G. Code § 1600 et. seq.) or a California Endangered Species Act (CESA) Incidental Take Permit (ITP) (Fish & G. Code § 2081(b)) is needed for a project. The Department relies on the CEQA document prepared by the Lead Agency to make a finding and decide whether to issue the permit or agreement. It is important that the Lead Agency's Environmental

Conserving California's Wildlife Since 1870

Impact Report (EIR) considers the Department's Responsible Agency requirements. For example, CEQA requires the Department to include additional feasible alternatives or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect a project would have on the environment (CEQA Guidelines § 15096(g)(2)).

The Department offers the following comments and recommendations on this Project in our role as a Trustee and Responsible Agency.

Project Description and Location

The Project "proposes to expand their existing aggregate mining operation established at the project site in 1990 and subsequently expanded in 2008, and add an asphalt batch plant. The proposal would expand an approved mining use permit area of 110.24 acres and an approved reclamation plan area of 108.87 acres to 179.97 acres, in conjunction with General Plan and Zoning Plan amendments from Natural Resource Protection – Open Space (N-O) to Mineral Resource (MR) and from Unclassified (U) to Mineral Resource (MR), respectively. The overall Project area within which general plan, zoning plan, use permit and reclamation plan amendment approvals are requested is 179.97 acres."

The Project is located at 10936 Iron Mountain Road, Redding, California on Assessor's Parcel Numbers 065-250-002, -024, -025, -026, and 065-260-010.

Comments and Recommendations

To enable Department staff to adequately review and comment on the proposed Project, we recommend the following information be included in the DEIR, as applicable.

1. A complete assessment of the flora and fauna within and adjacent to the Project area should be conducted, with particular emphasis upon identifying special-status species including rare, threatened, and endangered species as well as fire followers, which can take up to two years to bloom after a fire. This assessment should also address locally unique species, rare natural communities, and wetlands. The assessment area for the Project should be large enough to encompass areas potentially subject to both direct and indirect Project affects. Both the Project footprint and the assessment area (if different) should be clearly defined and mapped in the DEIR. If previous surveys have been conducted, they should be less than two years old and conducted during the appropriate blooming time for plants and when wildlife would be most active. If surveys are prepared outside the appropriate time period, the Department, acting in its roll as a Responsible Agency for the issuance of permits and agreements, may need to request those surveys be repeated during the appropriate time period in order to address permit specific impacts. Botanical surveys should be conducted by a

qualified botanist with experience in local flora and fauna and knowledge of post-fire botanical succession.

- a. The Department's California Natural Diversity Data Base (CNDDDB) should be searched to obtain current information on previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12, Sections 1930-1940 of the Fish and Game Code. In order to provide an adequate assessment of special-status species potentially occurring within the Project vicinity, the search area for CNDDDB occurrences should include all United States Geological Survey 7.5-minute topographic quadrangles with Project activities, and all adjoining 7.5-minute topographic quadrangles. The DEIR should discuss how and when the CNDDDB search was conducted, including the names of each quadrangle queried, or why any areas may have been intentionally excluded from the CNDDDB query. As a reminder, the Department cannot and does not portray the CNDDDB as an exhaustive and comprehensive inventory of all rare species and natural communities statewide. Field verification for the presence or absence of sensitive species will always be an important obligation of its users. Likewise, your contribution of data to the CNDDDB is equally important to the maintenance of the CNDDDB. Whenever possible, we request that data be submitted using our online field survey form along with a map with the rare populations or stands indicated.
- b. In addition to the CNDDDB, other electronic databases such as those maintained by the California Native Plant Society and U.S. Fish and Wildlife Service (USFWS) should be queried.
- c. A complete assessment of rare, threatened, and endangered invertebrate, fish, wildlife, reptile, and amphibian species should be presented in the DEIR. Rare, threatened, and endangered species to be addressed shall include all those that meet the CEQA definition (see CEQA Guidelines § 15380). Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the species are active or otherwise identifiable, are recommended. Acceptable species-specific survey procedures should be developed in consultation with the Department and the USFWS. Links to some survey procedures are provided on the Department's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>).
- d. Species of Special Concern (SSC) status applies to animals generally not listed under the federal Endangered Species Act or CESA, but which nonetheless are declining at a rate that could result in listing, or historically

occurred in low numbers and known threats to their persistence currently exist (see CEQA Guidelines § 15380 and CEQA Guidelines Appendix G (IV)(a)). SSC should be considered during the environmental review process. CEQA (California Public Resources Code sections 21000-21177) requires State agencies, local governments, and special districts to evaluate and disclose impacts from "projects" in the State. Section 15380 of the CEQA Guidelines clearly indicates that SSC should be included in an analysis of Project impacts if they can be shown to meet the criteria of sensitivity outlined therein.

Sections 15063 and 15065 of the CEQA Guidelines, which address how an impact is identified as significant, are particularly relevant to SSCs. Project-level impacts to listed (rare, threatened, or endangered species) species are generally considered significant thus requiring lead agencies to prepare an EIR to fully analyze and evaluate the impacts. In assigning "impact significance" to populations of non-listed species, analysts usually consider factors such as population-level effects, proportion of the taxon's range affected by a project, regional effects, and impacts to habitat features.

- e. Fully Protected animals may not be taken or possessed at any time and the Department is not authorized to issue permits or licenses for their incidental take¹. Fully Protected animals should be considered during the environmental review process and all Project-related take must be avoided.
- f. A thorough assessment of rare plants and rare natural communities should be conducted, following the Department's March 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*.
- g. A detailed vegetation map should be prepared, preferably overlaid on an aerial photograph. The map should be of sufficient resolution to depict the locations of the Project site's major vegetation communities and show Project impacts relative to each community type. The Department's preferred vegetation classification system should be used to name the polygons; however, the vegetation classification ultimately used should be described in detail. Additional information for vegetation mapping can be found on the Department's website (<https://www.wildlife.ca.gov/Data/VegCAMP>). Special Status natural communities should be specifically noted on the map.

¹ Scientific research, take authorized under an approved NCCP, and certain recovery actions may be allowed under some circumstances; contact the Department for more information.

- h. In order for the Department to determine the adequacy and accuracy of surveys, the DEIR should include survey methods, dates, and results; and should list all plant and animal species (with scientific names) detected within the Project study area. If detailed survey information is not included in the DEIR, the Department will request these during our review of the document. Special emphasis should be directed toward describing the status of rare, threatened, and endangered species in all areas potentially affected by the Project. All necessary biological surveys should be conducted in advance of the DEIR circulation, and should not be deferred until after Project approval.
2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, should be included.
 - a. The DEIR should present clear thresholds of significance to be used by the Lead Agency in its determination of environmental effects. A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect. (CEQA Guidelines § 15064.7)
 - b. CEQA Guidelines, section 15125 (a-e), direct that knowledge of environmental conditions at both the local and regional levels is critical to an assessment of environmental impacts and that special emphasis shall be placed on resources that are rare or unique to the region. This will be especially important because of the impact the Carr Fire had on the Project area and adjacent area.
 - c. Impacts associated with initial Project implementation as well as long-term operation and maintenance of the Project shall be addressed in the DEIR pursuant to CEQA Guidelines 15126.2 (a).
 - d. In evaluating the significance of the environmental effect of the Project, the Lead Agency should consider direct physical changes in the environment, which may be caused by the Project and reasonably foreseeable indirect physical changes in the environment, which may be caused by the Project. Expected impacts should be quantified (e.g., acres, linear feet, number of individuals taken, volume or rate of water extracted, etc.).
 - e. Project impacts should be analyzed relative to their effects on off-site habitats and species. Specifically, this may include public lands, open space, downstream aquatic habitats, areas of groundwater depletion, or any other natural habitat or species that could be affected by the Project (CEQA Guidelines Appendix G (IV and IX)).

- f. Impacts to and maintenance of wildlife corridor/movement areas and other key seasonal use areas should be fully evaluated and provided (CEQA Guidelines Appendix G (IV), Fish and Game Code section 1930, and <https://www.wildlife.ca.gov/Conservation/Planning/Connectivity>).
- g. A discussion of impacts, including but not limited to the following, should be included in the DEIR: increased lighting, noise, human activity, impacts of free-roaming domestic animals including dogs and cats, changes in drainage patterns, changes in water volume, velocity, quantity and quality, soil erosion, and/or sedimentation in streams and watercourses.

The Department recognizes the effects of artificial lighting on birds and other nocturnal species. The effects are numerous and include impacts to singing and foraging behavior, reproductive behavior, navigation, and altered migration patterns. To minimize adverse effects of artificial light on wildlife, the Department recommends that lighting fixtures associated with the Project be downward facing, fully-shielded and designed and installed to minimize photo-pollution.

- h. A cumulative effects analysis shall be developed for species and habitats potentially affected by the Project. This analysis shall be conducted as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts to species and habitats.
3. A range of Project alternatives shall be analyzed to ensure that the full spectrum of alternatives to the proposed Project are fully considered and evaluated. Alternatives, which avoid or otherwise minimize impacts to sensitive biological resources shall be identified.
- a. If the Project will result in any impacts described under the Mandatory Findings of Significance (CEQA Guidelines § 15065) the impacts must be analyzed in depth in the DEIR, and the Lead Agency is required to make detailed findings on the feasibility of alternatives or mitigation measures to substantially lessen or avoid the significant effects on the environment. When mitigation measures or Project changes are found to be feasible, such measures should be incorporated into the Project to lessen or avoid significant effects.
4. Mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats should be developed and thoroughly discussed in the

DEIR. Mitigation measures should first emphasize avoidance and reduction of Project impacts. For unavoidable impacts, the feasibility of on-site habitat restoration or enhancement should be discussed. If on-site mitigation is not feasible, off-site mitigation through habitat creation, enhancement, acquisition and preservation in perpetuity should be addressed.

- a. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for most impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful. If considered, the feasibility of these types of mitigation measures must be discussed with the Department prior to release of the DEIR.
 - b. Areas reserved as mitigation for Project impacts must be legally protected from future direct and indirect development impacts. Potential issues to be considered include public access, conservation easements, species monitoring, management programs, water pollution, and fire management.
 - c. Plans for restoration and revegetation should be prepared by persons with expertise in northern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and/or seeding rates; (c) a schematic depicting the mitigation area; (d) planting/seeding schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for long-term conservation of the mitigation site.
5. Please include fuel modification impacts on vegetation in the biological resources section of the DEIR. All impacts, including future maintenance, should be quantified and described.
 6. Take of species of plants or animals listed as endangered or threatened under CESA is unlawful unless authorized by the Department. However, a CESA 2081(b) ITP may authorize incidental take during Project construction or over the life of the Project. The DEIR must state whether the Project could result in any amount of incidental take of any CESA-listed species. Early consultation for incidental take permitting is encouraged, as significant modification to the Project's description and/or mitigation measures may be required in order to obtain a CESA Permit. Information on how to obtain an ITP is available through

the Department's website at:

<https://www.wildlife.ca.gov/Conservation/CESA/Incidental-Take-Permits>.

The Department's issuance of a CESA Permit for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA will consider the Lead Agency's EIR for the Project. The Department may require additional mitigation measures for the issuance of a CESA Permit unless the Project CEQA document addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA Permit.

To expedite the CESA permitting process, the Department recommends that the DEIR addresses the following CESA Permit requirements:

- a. The impacts of the authorized take are minimized and fully mitigated;
 - b. The measures required to minimize and fully mitigate the impacts of the authorized take and: (1) are roughly proportional in extent to the impact of the taking on the species; (2) maintain the applicant's objectives to the greatest extent possible, and (3) are capable of successful implementation;
 - c. Adequate funding is provided to implement the required minimization and mitigation measures and to monitor compliance with and the effectiveness of the measures; and
 - d. Issuance of the permit will not jeopardize the continued existence of a State-listed species.
7. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion, which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, Project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. The DEIR should demonstrate that the Project will not result in a net loss of wetland habitat values or acreage.
- a. The Project location supports aquatic, riparian, or wetland habitat. A delineation of lakes, streams, and associated riparian habitats potentially affected by the Project should be provided for agency and public review. This report should include a preliminary jurisdictional delineation including

wetlands identification pursuant to the USFWS wetland definition² as adopted by the Department³. Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers. The jurisdictional delineation should also include mapping of ephemeral, intermittent, and perennial stream courses potentially impacted by the Project. The Department considers impacts to any wetlands (as defined by the Department) as potentially significant.

- b. The Project may require notification to the Department for a Lake or Streambed Alteration Agreement (LSAA) pursuant to section 1602 et seq. of the Fish and Game Code, prior to the applicant's commencement of any activity that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank (which may include associated riparian resources) of a river, stream or lake, or use material from a streambed. The Department's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction's (Lead Agency) Negative Declaration or EIR for the Project. To minimize additional requirements by the Department pursuant to Fish and Game Code section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement. A LSAA notification package may be obtained through the Department's website at <https://www.wildlife.ca.gov/Conservation/LSA>.
8. CEQA requires that information developed in EIRs and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations. (Public Resources Code section 21003(e)). Please report any special status species and natural communities detected during Project surveys to the CNDDDB. The CNDDDB field survey form can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be mailed electronically to CNDDDB at the following email address:

² Cowardin, Lewis M., et al. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, U.S. Fish and Wildlife Service.

³California Fish and Game Policies: Wetlands and Resource Policy; Wetland Definition, Mitigation Strategies, and Habitat Value Assessment Methodology; Amended 1994.

CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

9. The Reclamation Plan associated with this Project will be updated per the NOP. The vegetation restoration portion of the Reclamation Plan needs to describe in detail how the area should function post mine closure. The planting of a ponderosa pine (*Pinus ponderosa*) plantation with no associated shrubs and/or understory as described during the site visit on October 15, 2019, is not a normal functioning ecosystem. Further, having the Reclamation Plan cover an additional 150 years of mining operation is not practical. It would be prudent to address the vegetation prescription with an adaptive management approach which would add in flexibility to the plant species used and perhaps the success criteria based on the climate at the time the mine closes.

All existing and future Reclamation Plans shall use California native species. The non-native grass and clover species used in the 2008 revised Reclamation Plan for the Upland Bench Groundcover Prescription should not be used in this new Reclamation Plan and should be removed from the 2008 plan. Those specific species include common barley (*Hordeum vulgare*), Italian rye grass (*Festuca perennis*) shown on Table 2 of the 2008 updated Reclamation Plan as annual rye grass (*Lolium multiflorum*), Crimson clover (*Trifolium incarnatum*), and rose clover (*Trifolium hirtum*) which is an invasive species.

10. The DEIR should describe the asphalt batch plant in detail and describe the design and safety features that will be used to keep the asphalt and the asphalt oil away from the ponds and unnamed tributary.
11. A bullfrog management plan will need to be prepared to stop the spread of this invasive species using the onsite ponds. These ponds are located in a watershed directly connected to waters used by anadromous salmonids and invasive species should not be allowed to propagate in these watersheds unchecked.
12. The final design of the expansion is to have a 66.85-acre pond with 40-foot high benches surrounding it. The water will attract wildlife and they will be able to get down to it but may not be able to climb out. The Department recommends putting in wildlife-friendly ramps in various parts of the mine to allow wildlife to escape.
13. The Biological Review, dated July 2019, and prepared by Wildland Resource Managers is a draft document that the Department was told was being updated. The Department looks forward to reviewing the updated report. The day of the site visit (October 15, 2019), which was not at the optimal wildlife viewing time,

Department staff detected five bird species, one butterfly species and one reptile species. The Department hopes the updated report has a list of wildlife species observed and that these observations are gathered over multiple days during seasonally appropriate times. The area seems to be recovering well considering recent fire. In addition, Table 4 of the report suggests that none of the listed anadromous fish could be impacted by the Project. In the DEIR, please provide an analysis of what happens if the settling ponds overflow and the non-native, unpermitted fish in settling pond number 5 are accidentally released during a high flow into the unnamed tributary or if toxic pollutant water is accidentally released into the unnamed tributary. The DEIR should include measures that would prevent such outcomes.

If you have any questions, please contact Amy Henderson, Senior Environmental Scientist, at (530) 225-2779, or by e-mail at Amy.Henderson@wildlife.ca.gov.

Sincerely,



for **Curt Babcock**
Habitat Conservation Program Manager

ec: Lio Salazar, Senior Planner
Shasta County Department of Resource Management
lsalazar@co.shasta.ca.us

Tara Petti
Shasta County Department of Resource Management
tpetti@co.shasta.ca.us

State Clearinghouse
state.clearinghouse@opr.ca.gov

Central Valley Regional Water Quality Control Board

29 October 2019

Lio Salazar, Senior Planner
Shasta County Department of Resource Management, Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001

COMMENTS ON CRYSTAL CREEK AGGREGATE EXPANSION PROJECT (GENERAL PLAN AMENDMENT 19-0003, ZONING PLAN AMENDMENT 19-0002, USE PERMIT AMENDMENT 19-0007, AND RECLAMATION PLAN AMENDMENT 19-0001), STATE CLEARINGHOUSE #2019090702, REDDING, SHASTA COUNTY

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) is a responsible agency for this project, as defined by the California Environmental Quality Act (CEQA). On 29 September 2019, we received your request for comments on the Crystal Creek Aggregate Expansion Project (Project), State Clearinghouse (SCH) #2019090702.

PROJECT DESCRIPTION

Crystal Creek Aggregate (CCA) is proposing to expand their existing aggregate mining operation which was established at the project site in 1990 and subsequently expanded in 2008. The proposal would expand an approved mining use permit area of 110.24 acres and an approved reclamation plan area of 108.87 acres to 179.97 acres, in conjunction with General Plan and Zoning Plan amendments from Natural Resource Protection – Open Space (N-O) to Mineral Resource (MR) and from Unclassified (U) to Mineral Resource (MR), respectively. The overall Project area within which general plan, zoning plan, use permit and reclamation plan amendment approvals are requested is 179.97 acres.

The expansion also includes the deepening of the existing quarry by approximately 100 feet from the previously approved pond bottom elevation of 700 feet mean sea level (msl). High water surface elevation is proposed at 734 feet msl. The proposed project also identifies a spillway for the quarry pond at an elevation of 734 feet msl. The spillway discharges into Existing Pond No. 4 which receives storm water runoff from the plant site and contains an outfall that discharges to Middle Creek, which is a tributary of the Sacramento River. Middle Creek is located outside the east property boundary and flows south along Iron Mountain Road.

KARL E. LONGLEY SCD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

In addition to the expansion, CCA is also proposing to construct and operate an onsite asphalt batch plant.

CENTRAL VALLEY WATER BOARD COMMENTS

Based on our review of the information submitted for the proposed project, we have the following comments:

General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (CGP)

Construction activity, including demolition, resulting in a land disturbance of one acre or more must obtain coverage under the CGP. The Crystal Creek Aggregate Expansion Project must be conditioned to implement storm water pollution controls during construction and post-construction as required by the CGP. To apply for coverage under the CGP, the property owner must submit Permit Registration Documents electronically prior to construction. Detailed information on the CGP can be found on the State Water Board website [Water Boards Stormwater Construction Permits](https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml) (https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

Industrial Storm Water (IGP)

On 16 November 1990, the USEPA promulgated storm water regulations (40 CFR Parts 122, 123 & 124) which require specific categories of industrial facilities discharging storm water to obtain NPDES permits and to implement Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) to reduce or eliminate industrial storm water pollution. These requirements apply to industries with Standard Industrial Classifications (SIC) specified in Attachment A of the *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities* (IGP, Order 2014-0057-DWQ, NPDES No. CAS000001). Crystal Creek Aggregate's current industrial operations are covered under the IGP. A change to the facility and/or operations would require submittal and certification of new Industrial General Permit Registration Documents via the State Water Resource Control Board's Stormwater Multiple Application and Report Tracking System. Detailed information on the IGP can be found on the State Water Board website [Water Boards Storm Water Multiple Application and Report Tracking System](https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.xhtml) (<https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.xhtml>).

Clean Water Act (CWA) Section 401, Water Quality Certification

The Central Valley Water Board has regulatory authority over wetlands and waterways under the Federal Clean Water Act (CWA) and the California Water Code, Division 7 (CWC). Discharge of dredged or fill material to waters of the United States requires a CWA Section 401 Water Quality Certification from the Central Valley Water Board. Typical activities include any modifications to these waters, such as stream crossings, stream bank modifications, filling of wetlands, etc. 401 Certifications are issued in combination with CWA Section 404 Permits issued by the Army Corps of Engineers. The proposed project must be evaluated for the presence of jurisdictional waters,

including wetlands and other waters of the State. Steps must be taken to first avoid and minimize impacts to these waters, and then mitigate for unavoidable impacts. Both the Section 404 Permit and Section 401 Water Quality Certification must be obtained prior to site disturbance. Any person discharging dredge or fill materials to waters of the State must file a report of waste discharge pursuant to Sections 13376 and 13260 of the California Water Code. Both the requirements to submit a report of waste discharge and apply for a Water Quality Certification may be met using the same application form, found at [Water Boards 401 Water Quality Certification Application](http://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/wqc_application.pdf) (http://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/wqc_application.pdf)

Isolated wetlands and other waters not covered by the Federal Clean Water Act
Some wetlands and other waters are considered "geographically isolated" from navigable waters and are not within the jurisdiction of the Clean Water Act. (e.g., isolated wetlands, vernal pools, or stream banks above the ordinary high-water mark). Discharge of dredged or fill material to these waters may require either individual or general waste discharge requirements from the Central Valley Water Board. If the U.S. Army Corps of Engineers determine that isolated wetlands or other waters exist at the project site, and the project impacts or has potential to impact these non-jurisdictional waters, a Report of Waste Discharge and filing fee must be submitted to the Central Valley Water Board. The Central Valley Water Board will consider the information provided and either issue or waive Waste Discharge Requirements. Failure to obtain waste discharge requirements or a waiver may result in enforcement action.

Both the requirements to submit a report of waste discharge and apply for a Water Quality Certification may be met using the same application form, found at [Water Boards Adopted Orders for Water Quality](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf) (http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf)

Water Management During Active Quarrying

The proposed project anticipates expanding and deepening of the existing onsite quarry. As a result of the proposed activities, a larger volume of water likely will be present within the quarry. The water within the quarry will likely originate from three main sources: direct precipitation, storm water run-on, and exfiltrating groundwater. It is unclear if the water within the quarry will limit mining activities and if dewatering of the quarry will be required to access the minable materials. If dewatering of the quarry will be necessary, the project does not include a clear description of how these activities would be conducted and where this water would be discharged. Depending on the location and nature of discharge, dewatering activities could require a surface water discharge permit under our National Pollution Discharge Elimination System (NPDES) program or a land discharge permit under our Waste Discharge Requirements (WDRs) program.

The project should identify the water management approach for the quarry and should include contingencies for extreme conditions (e.g., pit overflow, exceedance of

detention basin capacity, interruptions of quarry operations when dewatering is not occurring). The environmental assessment should be supported by hydrologic studies and a water balance that provide the design-basis for the water management approach (e.g., sizing of detention basins based on estimated water volumes to be managed).

Regulatory Classification of Mine Pit Lake

Based on the mine pit lake water quality, the mine pit lake may be classified as a mining unit (surface impoundment) under California Code of Regulations, title 27, section 22470 et seq. Some of the requirements associated with classification as a mining unit include the issuance of waste discharge requirements, precipitation and drainage controls, water quality monitoring, post-closure maintenance, and closure and post-closure financial assurance. Post-closure financial assurance would need to be maintained in perpetuity and will be in place after release of Surface Mining and Reclamation Act (SMARA) reclamation bonds.

Title 27 also provides for closure financial assurances and under certain conditions allows the financial assurances established to comply with SMARA to be used as an alternate financial assurance mechanism (See Cal. Code Regs., tit. 27 22510(f) and (g)).

Perpetual Management of Mine Pit Lake Water Level

The Central Valley Water Board regulates several mine pit lakes that require active management of the water level after completion of reclamation. Based on our experience, evaporators are a commonly deployed method to control the lake water levels. Discharges from the mine pit lakes require coverage under a NPDES permit (whether intermittent or continuous discharges); some discharges require active or passive treatment. These costs associated with mine pit lake water level management must be included in the post-closure financial assurance cost estimate.

Mine Pit Lake Water Quality

The proposed mine pit lake may contain unique geochemistry relative to natural lakes. Pit lake water quality may be affected by groundwater flow, area geology and associated geochemistry, pH, trace element concentrations, evapo-concentration, and temperature. Water quality may be affected by surrounding inputs such as erosion (e.g., turbidity, total suspended solids, salinity) and nutrients, and any mineralized zones or abandoned mine workings intersected by the pit.

The environmental assessment should be supported by a study that evaluates the anticipated water quality of the mine pit lake so appropriate water management protocols, compliant with applicable regulatory requirements, can be designed and implemented. The study should assess temporal trends in mine pit lake water quality under drought and high precipitation conditions. The study should also assess potential impacts to surface water and groundwater based on the anticipated pit water quality.

During active quarry operations and post-reclamation, a monitoring program should be established to assess the pit water quality to ensure water management in compliance

with applicable regulations (such as California Code of Regulations, Title 27, section 22470 et seq.) and the Central Valley Water Board's *Water Quality Control Plan for the Sacramento and San Joaquin River Basin* (Basin Plan) water quality objectives (WQOs) for surface and/or groundwater.

Cyanobacteria Blooms

The proposed expansion of aggregate mining at the Facility, particularly the widening and deepening of the quarry will increase the volume of water contained within the quarry. The quarry and the large volume of water contained within it has the potential to create favorable conditions that could support the generation of toxic cyanobacteria blooms.

Cyanobacteria blooms within the quarry could have the potential for the release of cyanobacteria toxins from the quarry in the event water within the quarry is discharged to onsite storm water drainages. Storm water at the site is discharged to surface drainages that discharge into Middle Creek with is a tributary of the Sacramento River. This could potentially affect downstream drinking water suppliers and other beneficial uses. These conditions could persist or become exacerbated with rising temperatures expected from climate change. The potential for cyanobacterial blooms within the quarry and potential impacts to water quality should be further evaluated.

Pit Impacts on Project Area Hydrology

The proposed pit will affect the hydrology (hydrogeology and surface water hydrology) in the Project area, both during active quarry operations and post-reclamation as a mine pit lake. During active quarrying the pit may act as a sink, reducing groundwater flow to nearby groundwater wells and surface water features. Post-reclamation, the water level of the mine pit lake could create a groundwater mound; the water level should be managed to avoid uncontrolled overflow or other undesirable flow conditions.

The environmental assessment should be supported by hydrologic studies that identify anticipated impacts in the Project area, including potential impacts to nearby groundwater wells and surface water features and the anticipated water level in the mine pit lake. The studies should assess representative low and high precipitation periods and should include an annual water balance for the mine pit.

Historical Mining Activity in Project Area

Historical mining activities may have occurred in the Project area. The environmental assessment should include inventorying potential mines or adits and mine workings in the Project area as part of the environmental assessment. This information is needed to support projections of the mine pit lake water quality and potential hydrologic effects induced by the Project.

Geology of Project Area

The environmental review document will include a description of Project area geology. Please also include a discussion of the erosion potential of the pit slope during active quarry operations and post-reclamation conditions. The project should be supported by

a slope stability analysis of the pit slopes during the active life of the quarry and under post-reclamation conditions.

Wastewater Treatment and Disposal

The 20 November 2012 Report of Waste Discharge (ROWD) includes the discharge of aggregate wash water from an existing aggregate extraction facility to two onsite settling, percolation/ evaporation, and water reuse ponds. The ponds are set up as a water reuse system with no surface water discharge. The ROWD was deemed complete by Central Valley Water Board staff on 12 December 2012.

After subsequent review of the ROWD, Central Valley Water Board staff found that additional information was needed to evaluate the threat that aggregate wash water discharge may pose on waters of the state. Therefore, pursuant to California Water Code Section 13267 a Monitoring and Reporting program (MRP) was issued to the Facility on 16 October 2015. Information obtained from the MRP has not been fully evaluated and a determination on whether the Facility would require the issuance of a WDRs Order to regulate discharges at the Facility has also not been made.

The proposed project anticipates that the current peak aggregate production could increase from 270,000 tons per year (peak 2001) to 900,000 tons per year. The current proposal does not include the expansion or construction of additional process water ponds. Central Valley Water Board staff has concerns that proposed increase in aggregate production may require the need for expansion of existing ponds or construction of additional process water ponds. The impacts to water quality in the existing or additional ponds will need to be evaluated to ensure that process wash water does not pose a threat to water quality. Some of the concerns related to the wash water ponds include but are not limited to potential increases in salt concentrations, increases in dissolved and total metals concentrations, and changes in water chemistry parameters such as pH, electrical conductivity, and oxidation reduction potential.

The proposed project also includes the addition of an asphalt batch plant (batch plant) onsite. It is proposed the batch plant will be powered by propane gas with reduces its emissions when compared to emissions produced by an oil-fired batch plant. There is no information provided if any water will be used during the batch plants operation and if any subsequent wastewater would be produced. Activities associated with the production of asphalt material could include but are not limited to the use of water for any processing, cooling, or emissions needs. Also, no information is provided regarding on-site fuel management.

The California Water Code requires that any person proposing to discharge waste that could affect the quality of waters of the State to file a ROWD. Currently the Facility has an ROWD on file with the Central Valley Water Board for the existing facility and operations. Due to the potential threats to water quality that activities at the proposed facility pose, a new ROWD will likely be required so Central Valley Water Board staff can determine if operations associated with the proposed expansion project would need to be regulated by one or more Water Board programs.

A ROWD, Form 200 and supporting information must be submitted at least 140 days prior to any discharges that differ in nature, characteristic, manner, and location than that described in the 20 November 2012 ROWD submittal. Information regarding submittal of a ROWD and additional information can be found on our website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

Closing

If you have any questions or comments regarding the Central Valley Water Board's comments on the Project, please contact me at (530) 226-3425 or by email at Bryan.Smith@waterboards.ca.gov.



Bryan J. Smith, P.E.
Supervising Water Resource Control Engineer

SG: ch

cc: Matthew Roberts, U.S. Army Corps of Engineers, Redding
CD DG Redding Northwest – Cross Development LLC, Carrollton, Texas
Crystal Creek Aggregate, Inc., Redding

cc via email: Amy Henderson, Department of Fish and Wildlife, Region 1, Redding
Carla Serio, Shasta County Environmental Health Division, Redding

FW: Sha-299-20.29 Crystal Creek Aggregate NOP DEIR

Tara Petti <tpetti@co.shasta.ca.us>

Fri 11/1/2019 1:49 PM

To: Eihnard Diaz <ediaz@diazplanning.com>; Keith Hamblin <jehkah@shasta.com>; Jerry Comingdeer <jerry@crystalcreekaggregate.com>; Bruce Grove <bgrove@shn-engr.com>

Cc: 'Duane Miller' <duane@dkmengr.com>

From: Gonzalez, Marcelino@DOT [<mailto:marcelino.gonzalez@dot.ca.gov>]

Sent: Friday, November 1, 2019 10:25 AM

To: Lio Salazar <lsalazar@co.shasta.ca.us>

Cc: Battles, Michael@DOT <Michael.Battles@dot.ca.gov>

Subject: Sha-299-20.29 Crystal Creek Aggregate NOP DEIR

Lio,

Here is our main comment regarding Crystal Creek:

The Iron Mountain Rd./SR-299 intersection has left and right turn channelization, and lighting. The proposed increase in production will add to the number of westbound trucks using the right turn lane on a daily basis. The right turn lane has a long 300' taper and 165' right turn pocket. Considering the grade of SR-299 approaching the intersection from the east, the right turn lane needs to be lengthened and the taper shortened to handle the additional truck volume.

Since this segment of SR-299 is popular with local cyclists, the DEIR should include a recommendation to widen the highway to lengthen the existing right turn lane and provide a min. 4' bike lane adjacent to the WB thru lane. The existing 300' taper/165' rt. turn pocket should be improved to provide a 120' taper/315' rt. turn pocket (with bike lane).

Let me know if you have any questions.

Thanks!

Rob Stinger, P.E.

Chief - Traffic Engineering & Operations

Caltrans District 2

(530) 225-3229

From: Gonzalez, Marcelino@DOT

Sent: Thursday, October 3, 2019 2:00 PM

To: Stinger Jr, Rob F@DOT <rob.stinger@dot.ca.gov>; Pascal, Anthony C@DOT <anthony.pascal@dot.ca.gov>; Veatch, Steve C@DOT <steve.veatch@dot.ca.gov>; Arseneau, Troy A@DOT <troy.arseneau@dot.ca.gov>; Akana, Eric E@DOT <eric.akana@dot.ca.gov>; Elder, William H@DOT <william.elder@dot.ca.gov>

Cc: Grah, Kathy M@DOT <kathy.grah@dot.ca.gov>; Battles, Michael@DOT <Michael.Battles@dot.ca.gov>

Subject: Sha-299-20.29 Crystal Creek Aggregate NOP DEIR due 10-25

Any comments concerns or suggestions due by Oct 25.

Crystal Creek Aggregate (CCA) proposes to expand their existing aggregate mining operation established at the project site in 1990 and subsequently expanded in 2008, and add an asphalt batch plant. The proposal would expand an approved mining use permit area of 110.24 acres and an approved reclamation plan area of 108.87 acres to 179.97 acres.

Transportation:

The project would increase maximum and annual average production of aggregate material and introduce the production of a new product (asphalt), including the import of material to be recycled for use in producing asphalt. Transport of materials to and from the site would result in increased use of public roads and intersections, including State Highway 299 West.

The EIR will provide an assessment and determination regarding the significance of Transportation impacts of the project.

Members of the Public

FW: Scoping comments for CCA Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Wed 11/6/2019 8:41 AM

To: Bruce Grove <bgrove@shn-engr.com>; Eihnard Diaz <ediaz@diazplanning.com>; Comingdeer Jerry <JERRY@crystalcreekaggregate.com>

Cc: Adam Fieseler <afieseler@co.shasta.ca.us>

Good morning. Please find public scoping questions/comments below from Kristy Ortega.

Tara Petti

Assistant Planner

Shasta County Department of Resource Management

Planning Division

1855 Placer Street Suite 103

Redding, CA. 96001

Department Main Line (530)225-5532

From: D Ortega [mailto:dkortega@yahoo.com]

Sent: Wednesday, November 6, 2019 6:53 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Scoping comments for CCA Expansion Project

Dear Ms. Petti,

In regards to the proposed CCA expansion project, here is my list of scoping questions/comments:

1. What are the possible forms of cancer that may result from living near an asphalt plant?
2. What impact would the toxic fumes have on air quality for the elementary school students that go to school three miles (south west) away in Shasta?
3. What chemicals could be expected to end up Middle Creek, Rock Creek, and then in the Sacramento River from this operation?
4. What are the possible birth defects that an unborn child could develop due to living in close proximity to an asphalt plant?
5. What impact will the development of this plant, and the fumes have on future vegetation recovery in the Carr Fire burn scar area?
6. What toxins can be expected to leach into the soil and into the underground water?

7. Where will this plant get water to run its operation? Will they impact the Shasta Community Service District water?
8. What impact will an asphalt plant have on the air quality for sensitive groups living nearby?
9. What impact will any increased mining/blasting have on home foundations?
10. What impact will any increased mining/blasting have on the air quality? For sensitive groups, will this further impact air quality for them? What are the negative impacts to health for sensitive groups living in the area? Sensitive groups include the elderly, immunocompromised, babies, those living with existing respiratory issues like asthma, and those with allergies to dust and fumes.
11. What will the increased noise pollution be? Will there be added noise on the weekends? Will there be added noise in the evenings?
12. What will the increased light pollution be? Will there be more flood lights added to their property?
13. Is the increased traffic going to be a problem for the school buses that have routes along Iron Mountain Road. The driveway of CCA is a designated bus stop for the Shasta Union Elementary School District. Will this be safe for children to have a bus stop at the driveway of an asphalt plant?
14. What steps would be taken to make the area safe from any fires which could be caused by an asphalt batch plant given the combustible nature of the materials?
15. What impact will this have on the returning wildlife in the Carr Fire burn area?
16. How significant could the odor of an asphalt batch plant be for those living in the vicinity? Will this odor trigger allergies or asthma?
17. What neurological problems can result from living near an asphalt batch plant? For a developing fetus? For a small child?
18. Is there an increased risk of brain illness and dementia as a result of exposure to the chemicals in this production?
19. Is there an increased risk of cancer?
20. Is there an increased risk of respiratory illness? Will there be increased traffic crossing Iron Mountain Road near the site?
21. What impact could this have on the air quality for vegetation with regards to pollinators? Could this be harmful for bees in the area? To other native pollinators?
22. Will Pollutants such as Benzene, formaldehyde, Arsenic, bitumen, Polynuclear Aromatic Hydrocarbons (PNAs) and other toxic cancer causing carcinogens will leach into the nearby creeks and the Sacramento River? Will it leach into the water table?

23. What will the released pollutants do to the vegetation, including locally grown nearby gardens that homeowners grow for their own food?
24. What will the effect of those released pollutants be on the fish, reptiles, amphibians, mammals and birds that live in the area?
25. What will be the effect on humans from the released pollutants from the asphalt plant?
26. Will there be an increase for vehicle accidents on Iron Mountain Road, given the increase in large vehicles and trucks to haul the materials? The road is narrow and windy in many parts and the speed limit is 45 mph. Will adding more on the road cause increased traffic problems?
27. Will the increased dust lead to an increased cost for homeowners to have to more frequently change filters in AC and heating units?
28. How might this adversely affect the vegetation that did survive the Carr Fire, near the proposed operations? Will any living vegetation need to be removed?

Sincerely,
Kristy Ortega

FW: Crystal Creek aggregate

Tara Petti <tpetti@co.shasta.ca.us>

Fri 11/8/2019 10:51 AM

To: Bruce Grove <bgrove@shn-engr.com>; Comingdeer Jerry <JERRY@crystalcreekaggregate.com>; Eihnard Diaz <ediaz@diazplanning.com>

Cc: Adam Fieseler <afieseler@co.shasta.ca.us>; Paul Hellman <phellman@co.shasta.ca.us>

There were two public scoping calls received between today and yesterday. The first of which I have not received written comments yet. That call was from Marci Fernandes 15888 Rock Creek Rd. I will forward her comments if and when I receive them. The second set of comments are below. They are from Robert Richardson 11343 Tannstaaf Rd.

Tara Petti

Assistant Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Richard Robinson [mailto:arcson19@gmail.com]

Sent: Friday, November 8, 2019 8:31 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Crystal Creek aggregate

Hi

Thanks for taking my call.

My concerns for the expansion of Crystal Creek would be

1. Smell and noise. This would stop any rebuilding in the Keswick area. Keswick was destroyed and people are starting to reinvest in building nicer homes that they had. This would end that.

2. Hiking and biking in the area. Who is going to want to ride or hike all the trails in the area with the noise and smell. River Trail, trail 58, French Fry, Middle Creek and more.

3. Traffic. The expansion of the *Weyerhaeuser* lumber yard has already bought more trucks and forklifts crossing Iron Mountain Rd. Iron Mountain would need to be widened and repaved. The intersection with 299 is dangerous already. This might require a stoplight.

4. Property values. They already took a big hit with the fire. This would just make it impossible to sell a property.

5. I need to add. This may be the most important. **Mental health.** All of us in the Keswick area are suffering some depression after the fire. This would make it unbearable for some.

Thanks

Richard Robinson
530-604-4371

RE: Crystal Creek

Tara Petti <tpetti@co.shasta.ca.us>

Fri 11/8/2019 11:03 AM

To: Richard Robinson <arcson19@gmail.com>

Cc: Bruce Grove <bgrove@shn-engr.com>

Thank you for all your comments Richard. Thank you for the insight into expanding the range of notification for the Draft EIR.

Tara Petti

Assistant Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Richard Robinson [<mailto:arcson19@gmail.com>]

Sent: Friday, November 8, 2019 10:48 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Re: Crystal Creek

I think The residences on Keswick Dam Road to Lake Blvd should be notified. Any paving going north will bring trucks across that. Right now logging trucks from Sierra Pacific going from their Shasta lake mill going west come across that.

Thanks Rich

On Fri, Nov 8, 2019 at 9:17 AM Richard Robinson <arcson19@gmail.com> wrote:

5. I need to add. This may be the most important. **Mental health.** All of us in the Keswick area are suffering some depression after the fire. This would make it unbearable for some.

Public Scoping comments

Tara Petti <tpetti@co.shasta.ca.us>

Fri 11/8/2019 2:05 PM

To: Bruce Grove <bgrove@shn-engr.com>

Cc: Tara Petti <tpetti@co.shasta.ca.us>; Eihnard Diaz <ediaz@diazplanning.com>; Comingdeer Jerry <JERRY@crystalcreekaggregate.com>

Darcy and Ted Goldsmith came in to the office with scoping comments as follows.

Residence on Tanstaaf Lane. After the Carr Fire they get a lot more wind prevalent south wind up Rock Creek. Concerned that due to the loss of vegetation/trees there is no longer a buffer to mitigate odor.

She has chemical sensitivity and is concerned about the effects of the asphalt plant on her health.

Concern about impacts to property values, especially after the Carr Fire.

Tara Petti

Assistant Planner

Shasta County Department of Resource Management

Planning Division

1855 Placer Street Suite 103

Redding, CA. 96001

Department Main Line (530)225-5532

FW: Proposed asphalt plant in Keswick

Tara Petti <tpetti@co.shasta.ca.us>

Tue 11/12/2019 8:10 AM

To: Bruce Grove <bgrove@shn-engr.com>; Eihnard Diaz <ediaz@diazplanning.com>

Cc: Tara Petti <tpetti@co.shasta.ca.us>

Scoping comments from Friday afternoon.

Tara Petti

Assistant Planner

Shasta County Department of Resource Management

Planning Division

1855 Placer Street Suite 103

Redding, CA. 96001

Department Main Line (530)225-5532

From: Marci Fernandes [mailto:marcifernandes55@gmail.com]

Sent: Friday, November 8, 2019 4:45 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Proposed asphalt plant in Keswick

My name is Marci Fernandes and I live on Rock Creek Road in Keswick. My home and our surrounding forest was destroyed by the Carr fire. I am very concerned about an asphalt plant being built in downtown Keswick. The odor, air quality, possible groundwater contamination, noise, and fire hazard are all concerns of mine. I bought property in Keswick and now have a new home. Just the thought of living with the odor from an asphalt plant is quite devastating. I bought this property because of the wonderful smell of the forest and I'm determined to help it grow back. More people in the area need to be informed of this proposal because it will affect a larger area than just the immediate vicinity.

To: Shasta County Resource
MANAGEMENT.

From: Kurt + Nydia Schuhmeier

Attention: Mr. TARA Petti

I AM NOT IN FAVOR FOR AN ASPHALT BATCH
PLANT SURROUNDED BY A RESIDENTIAL AREA.
REASON SHOULD BE OBVIOUS.

SINCE CRYSTAL CREEK IS ALREADY PRODUCING
AGGREGATE SO BE IT,

HOWEVER, THE PERMIT SHOULD NOT BE
A ONE HUNDRED YEAR THING, RATHER PERMITTING
SHOULD BE NO MORE THAN 20 YEAR THING

IN OTHER WORDS, IT SHOULD BE REVISITED
EVERY 20 YEARS.

I WILL COMMENT ON THE ASPHALT BATCH AFTER
I SEE THE EXTENSIVE EIR.

Sincerely

The Schuhmeier Family

KW Schuh

Nov. 06, 2019

SCOPING SUGGESTIONS/COMMENTS

Crystal Creek Aggregate Expansion Project EIR (GPA 19-0003, Zone Amendment 19-0002, UP 19-0007, Reclamation Plan 19-0001)

PUBLIC COMMENT PERIOD: September 30 – November 8, 2019

COMMENT DEADLINE: November 8, 2019 at 5:00 p.m.

NAME: John Deaton

Agency: None

Mailing Address: 825 Leisha Lane, Redding, CA 96001

Phone Number: (530) 238-7005 cell

Iron Mountain Road is a designated bicycle route that can be hazardous for cyclists because there is little or no shoulder and because vehicle drivers sometimes have a limited view of traffic ahead. The volume of bicycle traffic (both mountain bikes and road bikes) has increased steadily the past few years. This hazard will certainly become worse because of increased commercial truck traffic with the expansion of Crystal Creek Aggregates. To help mitigate the hazards for bicyclists using Iron Mountain Road, I suggest the following signage to clearly alert drivers regarding the **California Three Feet for Safety Act** ([CVC 21760](#)), which states:

- a) A driver to provide a three feet buffer between his/her vehicle and the bicycle when passing; and,
- b) A driver who is unable to provide the minimum three-foot passing distance due to traffic or roadway conditions to (1) slow to a reasonable and prudent speed when passing and (2) only pass when doing so would not endanger the safety of the bicyclist.”

Recommendation 1

At the existing sign located on *northbound* Iron Mountain Road (near the turnoff from Hwy 299/Eureka Way) replace the **SHARE THE ROAD** and **BICYCLE LOGO** signs with California Highway Manual sign R117(CA) **PASS 3-FT MIN**. *The existing signpost should be suitable.*

Recommendation 2

Install a signpost with the same signage as Recommendation 1, after the *southbound* lane passes through the industrial area (between the industrial area and Hwy 299). *This will likely require a new signpost.*

Recommendation 3

Install **SHARE THE ROAD** sign with a **BICYCLE LOGO** sign near and on both sides of Rock Creek and Middle Creek bridges. The signs taken down in Recommendation 1 could be reused for one of these four installations. *Existing signposts might be suitable for all of these signs.*

Recommendation 4

To help mitigate the cumulative effects of traffic on Iron Mountain Road, install a signpost with the same signage discussed in Recommendations 1 and 2, close to the Keswick Boat Ramp exit, between the exit and Hwy 299. *Existing signposts might be suitable for this sign.*

Thank you for your time and consideration.

John Deaton

FW: Crystal Creek Aggregate Expansion - Public Comments

Tara Petti <tpetti@co.shasta.ca.us>

Wed 11/6/2019 8:56 AM

To: Bruce Grove <bgrove@shn-engr.com>; Eihnard Diaz <ediaz@diazplanning.com>; Comingdeer Jerry <JERRY@crystalcreekaggregate.com>

Cc: Adam Fieseler <afieseler@co.shasta.ca.us>

📎 2 attachments (4 MB)

RockCreekMiddleCreek_CrystalCreekExpansion.pdf; Redding_MayorsMtnBikeChallenge_2019_FrenchFry-Trail58.pdf;

I have responded to both emails. Please see below.

Tara Petti

Assistant Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: bradandsandi@charter.net [mailto:bradandsandi@charter.net]
Sent: Tuesday, November 5, 2019 10:59 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Cc: 'Sandra Shearer' <sshearer@remedyengineering.com>
Subject: Crystal Creek Aggregate Expansion - Public Comments

Hello Tara,

Thank you for hosting the Crystal Creek Aggregate Expansion public meeting last week. It was very informative. I wanted to follow up with written comments regarding the EIR.

Name: Sandi Shearer
Agency: None. Redding/Shasta County resident and mountain biker
Mailing Address: 3404 Cessna Drive, Redding, CA 96001
Phone Number: 530-949-0039

Comments:

The area of the Crystal Creek Aggregate expansion is located in the vicinity of several of Shasta County's most popular mountain biking trails, including French Fry to the north and west of the project area, and Middle Creek and Trail 58 to the south of the project area. I drew the approximate outline of the proposed expansion on the attached trail map downloaded from Healthy Shasta's website for reference. In addition, Iron Mountain Road is very popular with road bikers, and many mountain bikers use the stretch of Iron Mountain Road adjacent to Crystal Creek Aggregate to connect French Fry and Trail 58/Middle Creek in a loop (as evidenced by the attached 2019 Redding Mayor's

Mountain Bike trail map). The City of Redding, Redding Trail Alliance, and numerous other local and regional agencies and organizations are working diligently to make Redding and Shasta County a "world-class mountain biking destination".

I request that the Environmental Impact Report fully evaluate the potential impacts of the Crystal Creek Aggregate project on recreation in the area, including mountain biking, road biking, and hiking. Potential impacts include aesthetic impacts from clearing and mining, noise from blasting, odor from the proposed asphalt plant, increased runoff/turbidity to Middle Creek or Rock Creek, dust generation, and increased truck traffic along Iron Mountain Road. I would also recommend that the project consider potential mitigation measures, such as building and maintaining an alternate bike route to Iron Mountain Road that connects the French Fry and Trail 58 trailheads (potentially along the historic railroad grade).

Thank you for your time and efforts.

Sandi Shearer
530-949-0039



Rock Creek - Middle Creek Trail System

Bureau of Land Management, Redding Field Office

(530) 224-2100

www.blm.gov/ca/redding



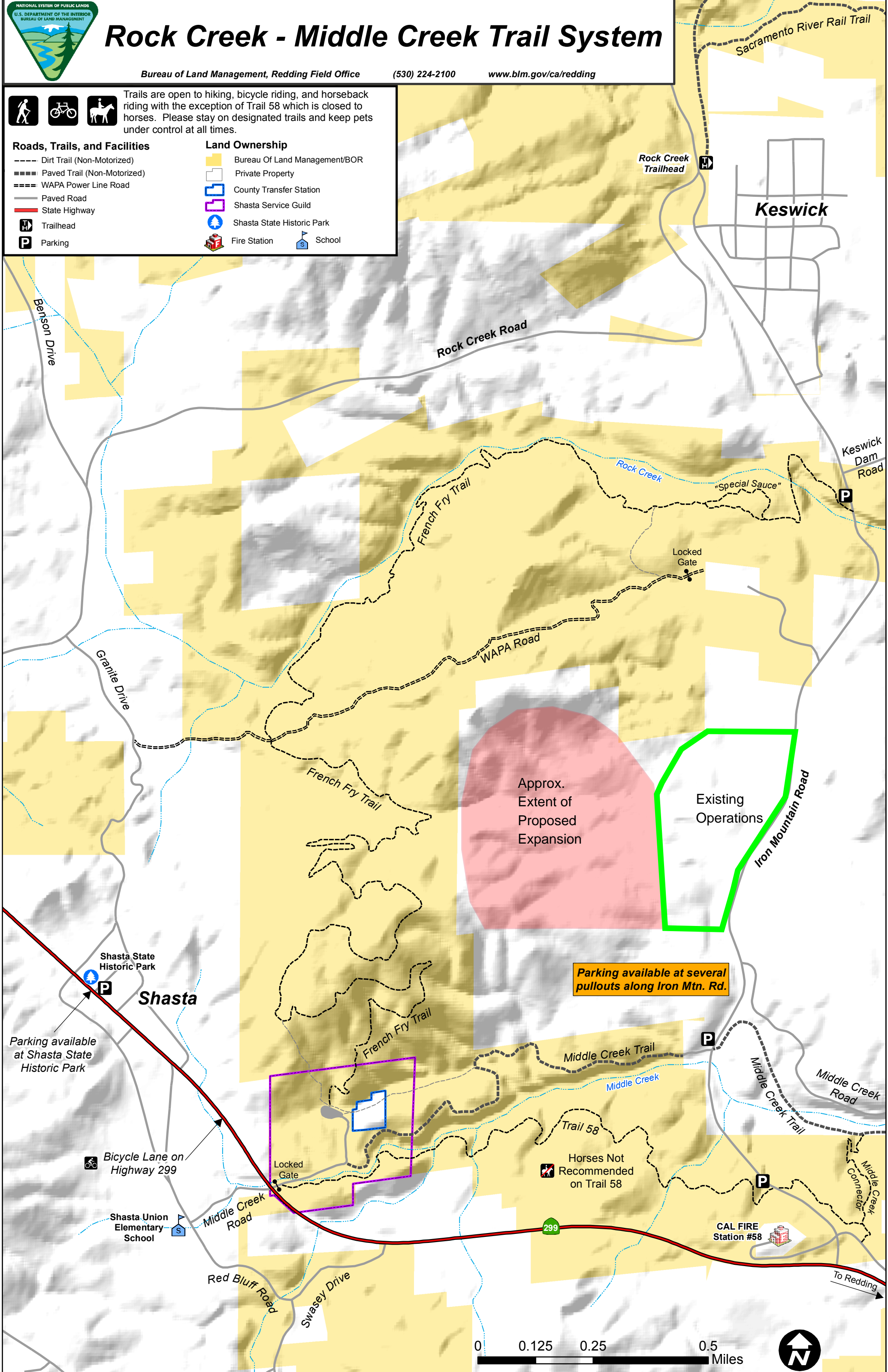
Trails are open to hiking, bicycle riding, and horseback riding with the exception of Trail 58 which is closed to horses. Please stay on designated trails and keep pets under control at all times.

Roads, Trails, and Facilities

- Dirt Trail (Non-Motorized)
- Paved Trail (Non-Motorized)
- WAPA Power Line Road
- Paved Road
- State Highway
- 📍 Trailhead
- 🅑 Parking

Land Ownership

- 🟡 Bureau Of Land Management/BOR
- 🏠 Private Property
- 🏢 County Transfer Station
- 🏠 Shasta Service Guild
- 🌲 Shasta State Historic Park
- 🚒 Fire Station
- 🎓 School



Approx. Extent of Proposed Expansion

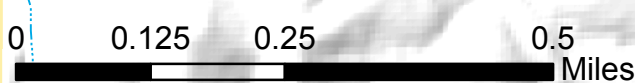
Existing Operations

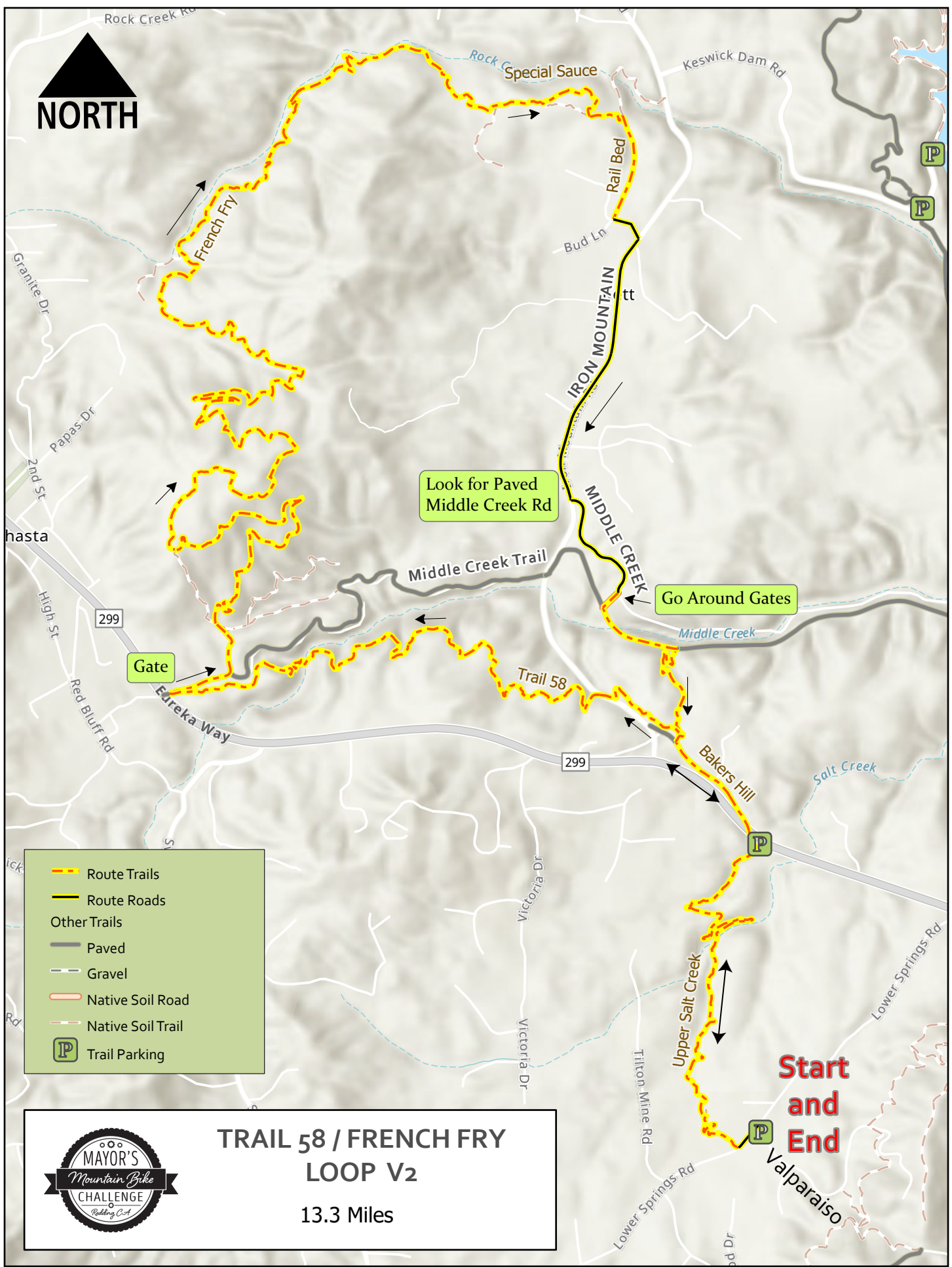
Parking available at several pullouts along Iron Mtn. Rd.

Parking available at Shasta State Historic Park

Bicycle Lane on Highway 299

Horses Not Recommended on Trail 58





Look for Paved Middle Creek Rd

Go Around Gates

Gate

- Route Trails
- Route Roads
- Other Trails
- Paved
- Gravel
- Native Soil Road
- Native Soil Trail
- Trail Parking



**TRAIL 58 / FRENCH FRY
LOOP V2**
13.3 Miles

**Start
and
End**

Appendix 5.4
AB 52 Notification Letters



Shasta County

DEPARTMENT OF RESOURCE MANAGEMENT
1855 Placer Street, Redding, CA 96001

Paul A. Hellman
Director
Dale J. Fletcher, CBO
Assistant Director

Certified Mail

October 7, 2019

Attn: Kelli Hayward, Cultural Resources Director

Wintu Tribe of Northern California & Toyon-Wintu Center
P.O. Box 995
Shasta Lake, CA 96019

FROM: Tara Petti, Assistant Planner
Planning Division
Shasta County Resource Management Department

RE: Tribal Cultural Resources under the California Environmental Quality Act, AB 52 (Gatto, 2014). Formal Notification of Determination that a Project Application is Complete, pursuant to Public Resources Code (PRC) § 21080.3.1.

Dear Ms. Hayward:

The Shasta County Department of Resource Management (Planning Division) is reviewing the application and will be preparing an Environmental Impact Report (EIR) for the following project: Crystal Creek Aggregate Expansion Project (General Plan Amendment 19-0003, Zoning Plan Amendment 19-0002, Use Permit Amendment 19-0007, and Reclamation Plan Amendment 19-0001).

Below please find a description of the proposed project, a description of the project location, and the name of our project point of contact, pursuant to PRC § 21080.3.1 (d). Additional exhibits and information regarding the proposed project are enclosed for your review.

PROJECT DESCRIPTION:

Crystal Creek Aggregate (CCA) proposes to expand their existing aggregate mining operation established at the project site in 1990 and subsequently expanded in 2008, and add an asphalt batch plant. The proposal would expand an approved mining use permit area of 110.24 acres and an approved reclamation plan area of 108.87 acres to 179.97 acres, in conjunction with General Plan and Zoning Plan amendments from Natural Resource Protection – Open Space (N-O) to Mineral Resource (MR) and from Unclassified (U) to Mineral Resource (MR), respectively. The overall Project area within which general plan, zoning plan, use permit and reclamation plan amendment approvals are requested is 179.97 acres.

Tribal Consultation Letter
Crystal Creek Aggregate Expansion Project
10/07/2019
Page 2

LOCATION:

The project site is an existing quarry located in the community of Keswick, on the west side of Iron Mountain Road, approximately 1.5 miles north of the Intersection of Iron Mountain Road and State Highway 299 West, and directly across from the intersection of Iron Mountain Road and Laurie Ann Lane (10936 Iron Mountain Road). Detailed location information including coordinates and a map indicating the location of the project area provided in the attached detailed project description.

POINT OF CONTACT:

Tara Petti, Associate Planner – phone: (530) 225-5533 email: tpetti@so.shasta.ca.us
Mailing Address: 1855 Placer Street, Suite 103, Redding, CA 96001

Pursuant to PRC § 21080.3.1 (b), you have 30 days from the receipt of this letter to request consultation, in writing, with the Planning Division.

Very Respectfully,



Tara Petti,
Assistant Planner

TP/trh
Enclosures

NOTICE OF PREPARATION

TO: State Clearinghouse
State Responsible Agencies
State Trustee Agencies
Other Public Agencies
Interested Organizations
Members of the Public

FROM: County of Shasta
Shasta County Dept. of Resource Management,
Planning Division

CONTACT: Lio Salazar, Senior Planner
1855 Placer Street, Suite 103
Redding, CA 96001
(530) 225-5532

SUBJECT: Notice of Preparation of an Environmental Impact Report (EIR) for the Crystal Creek Aggregate Expansion Project (General Plan Amendment 19-0003, Zoning Plan Amendment 19-0002, Use Permit Amendment 19-0007, and Reclamation Plan Amendment 19-0001)

Shasta County is the Lead Agency under the California Environmental Quality Act (CEQA), and is preparing an Environmental Impact Report (EIR) for the project identified as the Crystal Creek Aggregate Expansion Project.

Attached to this Notice of Preparation (NOP) are a description of the probable environmental effects of the project (Attachment 1) and a detailed project description (Attachment 2), including a map indicating the location of the project area and relevant project related maps and figures.

The EIR will consider all substantive environmental issues which are raised by responsible agencies, trustee agencies, other interested agencies, and members of the public or related groups during the NOP process, and will analyze these potential effects in detail and to the extent necessary to make a determination on the level of significance of such effects. Discussion of those environmental effects determined to result in no impact or a less-than-significant impact will be limited to a brief explanation in the EIR of why those effects are not considered potentially significant.

The following agencies may be a Trustee Agency and/or Responsible Agency for the proposed project, or have other jurisdiction/interests concerning the proposed project.

United States Fish and Wildlife Service (USFWS)
United States Army Corps of Engineers (ACOE)
United States Mine Safety and Health Administration (MSHA)
United States Bureau of Land Management (BLM)
California Department of Fish and Wildlife (DFW)
California Department of Forestry and Fire Protection (Cal Fire)
California Department of Transportation (Caltrans)
California Department of Toxic Substances Control (DTSC)
California Department of Resources and Recycling and Recovery (CalRecycle)
California Regional Water Quality Control Board (RWQCB)
California Division of Mine Reclamation (DMR)
California Division of Occupational Safety and Health (Cal OSHA)
Shasta County Resource Management Agencies (Air Quality, Environmental Health, Building, Fire)
Shasta County Department of Public Works (DPW)
Shasta County Sheriff's Department (Sheriff)

Shasta Community Services District (SCSD)
Shasta Union High School District (SUHSD)
Redding School District (RSD)
City of Redding (COR)

Whether your agency is or is not listed above we need to know the views of your agency or organization as to the scope and content of the environmental information germane to your agency's statutory responsibilities or of interest to your organization in connection with the proposed project. Specifically, we are requesting the following:

1. Identify potentially significant environmental effects, alternatives, and recommended mitigation measures that you believe need to be explored in the EIR with supporting discussion of why you believe these effects may be significant.
2. Describe special studies and other information that you believe are necessary in order for the County to analyze the potentially significant environmental effects, alternatives, and recommended mitigation measures you have identified.
3. Provide the name, title, and telephone number of the contact person from your agency or organization that we can contact regarding your comments.
4. If you are a public agency, state if your agency will be a responsible or trustee agency for the project and list the permits or approvals from your agency that will be required for the project and its future actions.

Due to the time limits mandated by State law, your response must be received by the County of Shasta by the following deadlines:

- **For responsible and trustee agencies, not later than 30 days after you receive this notice,**
- **For all other agencies, organizations, and individuals not later than 30 days from publication of this Notice of Preparation. The 30-day review period ends on Tuesday, October 29, 2019.**

If we do not receive a response from you/your agency or organization within the applicable time frame, we will presume that you/your agency or organization has no response.

A responsible agency, trustee agency, or other public agency may request a meeting with Shasta County or its representatives in accordance with Section 15082(c) of the CEQA Guidelines. Electronic copies of the NOP are available by clicking on the Crystal Creek Aggregate Expansion Project link on the Shasta County Department of Resource Management homepage at:

http://www.co.shasta.ca.us/index/drm_index/planning_index/eirs.aspx.

Please provide your responses and any direct questions to the attention of Lio Salazar, Senior Planner, via mail/delivery to Shasta County Department of Resource Management, Planning Division, 1855 Placer Street, Suite 103, Redding, CA 96001 or via e-mail to lsalazar@co.shasta.ca.us. Phone (530) 225-5532.

Date: 9/30/19  Lio Salazar, Senior Planner

POTENTIAL ENVIRONMENTAL IMPACTS OF THE CRYSTAL CREEK AGGREGATE EXPANSION PROJECT

Project Location and Setting:

The project site is an existing quarry located in the community of Keswick, on the west side of Iron Mountain Road, approximately 1.5 miles north of the Intersection of Iron Mountain Road and State Highway 299 West, and directly across from the intersection of Iron Mountain Road and Laurie Ann Lane (10936 Iron Mountain Road). Detailed location information including coordinates and a map indicating the location of the project area provided in the attached detailed project description.

The existing quarry is located in an industrial area in the community of Keswick. Surrounding land uses consist of industrial to the east, low-density residential to the north and southeast, and undeveloped land to the south and west.

The topography of the existing quarry floor has been made relatively flat by the removal of the aggregate material. The existing bowl shaped quarry face extends upslope and to the west from the quarry floor with horizontal benches having been or to be established as excavation proceeds to the extent of the existing quarry boundary. There is an approximate 200-foot change in elevation from the existing quarry floor to what would be the top of the quarry face based on the current mining plan.

The project site is located within the boundary of the 2018 Carr Fire. Prior to the area being impacted by the Carr Fire, the primary vegetation type present in unmined portions of the project site and vicinity was predominantly knob cone pine and chaparral with scattered oaks and ponderosa pine. In areas where the fire burned with lesser intensity, the composition of species remains as it existed prior to the fire. Currently, in unmined portions of the project site and vicinity where the fire burned with greater intensity, vegetation consists mostly of secondary successional vegetation.

Project Description:

Crystal Creek Aggregate (CCA) proposes to expand their existing aggregate mining operation established at the project site in 1990 and subsequently expanded in 2008, and add an asphalt batch plant. The proposal would expand an approved mining use permit area of 110.24 acres and an approved reclamation plan area of 108.87 acres to 179.97 acres, in conjunction with General Plan and Zoning Plan amendments from Natural Resource Protection – Open Space (N-O) to Mineral Resource (MR) and from Unclassified (U) to Mineral Resource (MR), respectively. The overall Project area within which general plan, zoning plan, use permit and reclamation plan amendment approvals are requested is 179.97 acres.

The attached detailed project description narrative provides background information; an overview of the proposed project entitlement application approvals being sought; detailed descriptions of the proposed entitlements (including relevant figures); and discussions regarding reclamation plan objectives, phasing, prescriptions, additional policies, and CEQA Project Objectives.

Aesthetics:

The project would increase the permitted post-mining bench height from 24 feet to 40 feet and extend said benches up to the top of the existing ridgeline exposing a series of 40-foot-high vertical walls of rock, the buff color of which would contrast with the adjacent grey-green vegetated area. The bench tops would be planted with native trees and shrubs as part of the proposed reclamation plan. Reclamation would occur in phases, but for periods of time and/or until reclamation vegetation is established some rock faces would be exposed.

The EIR will provide an assessment and determination regarding the significance of the aesthetic impacts of the project.

Agriculture and Forestry Resources

The project site may include timberland as defined in Public Resources Code section 12220(g). If the project site includes timberland, the project may result in the conversion of timberland if the proposed post reclamation conditions would forestall the ability of said timberlands to be managed for one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

The EIR will provide an assessment and determination regarding the significance of Agriculture and Forestry Resources impacts of the project.

Air Quality and Greenhouse Gas Emissions:

The project would generate or increase construction and operational air contaminant and greenhouse gas emissions, including dust from construction and mining operations, diesel emissions from on- and off-road vehicles and equipment, and diesel and process emissions, including odor, from the asphalt batch plant. These emissions would have the potential to impact regional and local air quality in the vicinity of the project site and to contribute to impacts on global climate.

The EIR will provide an assessment and determination regarding the significance of Air Quality and Greenhouse Gas Emissions impacts of the project.

Biological Resources:

The project may impact terrestrial, avian, and wetland or other hydrologic habitat that survived the Carr Fire or is currently recovering from the Carr Fire, including potential habitat for candidate, sensitive, and special-status species.

The EIR will provide an assessment and determination regarding the significance of Biological Resources impacts of the project.

Cultural Resources:

The project would involve physical disturbance to ground surface and sub-surface components in conjunction with aggregate quarrying and mining activities. Such activities have the potential to impact cultural resources that may be located within the project site.

The EIR will provide an assessment and determination regarding the significance of Cultural Resources impacts of the project.

Energy:

The project would involve the use of diesel fuel, electricity, and other sources of energy during construction and operations.

The EIR will provide an assessment and determination regarding the significance of Energy impacts of the project.

Geology and Soils:

The project would expose soils to potential erosion, modify the topography of the site and increase blasting to the extent that the geologic stability of the site may be impacted, and would alter geographic features present at the site.

The EIR will provide an assessment and determination regarding the significance of Geology and Soils impacts of the project.

Hazards and Hazardous Materials:

The project would involve construction and operations that would involve the use and/or transport of potentially hazardous materials, including asphalt cement (a product of crude oil), diesel fuel, lubricants, and other industrial materials.

The EIR will provide an assessment and determination regarding the significance of Hazards and Hazardous Materials impacts of the project.

Hydrology and Water Quality:

The project would alter the drainage pattern upslope of the existing quarry and expand a post reclamation open water pond at the quarry floor. Soils exposed and/or disturbed by mining would be a potential source of polluted storm water run-off which if discharged from the site could impact downstream surface water quality.

The EIR will provide an assessment and determination regarding the significance of Hydrology and Water Quality impacts of the project.

Land Use and Planning:

The project proposes General Plan and Zoning Plan amendments from Natural Resource Protection – Open Space (N-O) to Mineral Resource (MR) and from Unclassified (U) to Mineral Resource (MR), respectively.

The EIR will provide an assessment and determination regarding the significance of Land Use and Planning impacts of the project.

Mineral Resources:

The project would expand the development and extraction of aggregate material, a mineral resource of value to the Region and State, and facilitate production of asphalt. These products could provide a public benefit to the Region and State through their potential use in public works projects.

The EIR will provide an assessment and determination regarding the significance of Mineral Resources impacts of the project.

Noise:

The project would introduce new temporary and long-term noise sources (asphalt plant construction and operations) and increase production of noise from existing sources (as a result of increased maximum and average yearly aggregate production and blasting).

The EIR will provide an assessment and determination regarding the significance of Noise impacts of the project.

Public Services:

The project site is served by the Shasta Community Services District (domestic and fire protection water), Shasta County Fire Department (fire protection and emergency medical services), and Shasta County Sheriff's Department (law enforcement).

The EIR will provide an assessment and determination regarding the significance of Public Services impacts of the project.

Transportation:

The project would increase maximum and annual average production of aggregate material and introduce the production of a new product (asphalt), including the import of material to be recycled for use in producing asphalt. Transport of materials to and from the site would result in increased use of public roads and intersections, including State Highway 299 West.

The EIR will provide an assessment and determination regarding the significance of Transportation impacts of the project.

Tribal Cultural Resources:

The project is located within the Wintu Tribe of Northern California's (Tribe) geographic area of traditional and cultural affiliation (GATCA). In accordance with Public Resources Code section 21080.3.1, the Tribe has requested formal notice of and information on projects proposed within the Tribe's GATCA for which Shasta County will serve as lead agency in accordance with the California Environmental Quality Act (CEQA).

The project would involve physical disturbance to ground surface and sub-surface components in conjunction with aggregate quarrying and mining activities. Such activities have the potential to impact tribal cultural resources that may be located within the project site.

In accordance with the requirements of Assembly Bill (AB) 52, and more specifically Public Resources Code section 21080.3.1, Shasta County will provide notice of, and information regarding, the project to the Tribe. If the Tribe requests consultation within 30 days of notification, consultation will be initiated by Shasta County and proceed in accordance with the requirements of AB52.

The EIR will provide an assessment and determination regarding the significance of Tribal Cultural Resources impacts of the project.

Utilities and Service Systems:

The project would alter the existing drainage pattern of the site which could require or result in the relocation, alteration, or new construction of storm water drainage facilities on- or off-site. The project

would increase maximum and average annual production. Construction activities and increased production could increase the generation of solid waste from the project site.

The EIR will provide an assessment and determination regarding the significance of Utilities and Service Systems impacts of the project.

Wildfire:

The project site is located in a very high fire hazard severity zone and would involve the use of heavy equipment on steep vegetated slopes and industrial production processes that involve high heat inputs.

The EIR will provide an assessment and determination regarding the significance of Wildfire impacts of the project.

Cumulative Impacts:

The probable impacts of the project may be individually limited, but cumulatively considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The EIR will provide an assessment and determination regarding the significance of Cumulative Impacts of the project.

CRYSTAL CREEK AGGREGATE PROJECT DESCRIPTION NARRATIVE

Crystal Creek Aggregate (CCA) proposes to expand their existing aggregate mining operation established in 1990 at their current location in Shasta County on Iron Mountain Road, approximately one mile northeast of State Route 299 W (refer to **Figure 1, Project Location**). The operation would expand from an approved use permit area of 110.24 acres and a reclamation plan area of 108.87 acres to 179.97 acres. The overall Project area is 179.97 acres within which general plan, zoning, use permit and reclamation plan amendments approvals are requested. This Project Description Narrative provides background information; an overview of the proposed project entitlement application approvals being sought; detailed descriptions of the proposed entitlements; and discussions regarding reclamation plan objectives, phasing, prescriptions, additional policies, and CEQA Project Objectives.

BACKGROUND

CCA was originally permitted in 1990 under Shasta County Use Permit UP-24-90 and Reclamation Plan 1-90. Subsequently in 2008 the following entitlements were approved; General Plan Amendment 07-005, Zone Amendment 07-020, Use Permit Amendment, UP-07-020, and Reclamation Plan Amendment RP-07-022.¹ A California Environmental Quality Act (CEQA) Mitigated Negative Declaration with findings as specifically set forth in Planning Commission Resolution Nos. 2008-066 and 2008-067 was also adopted to approve the various entitlements. A Property Line Adjustment 06-034 was approved on May 17, 2006.

In the early 1990s, CCA recognized that the aggregate reserves remaining within their existing land ownership could potentially be depleted by 2010. CCA began to evaluate the potential of acquiring adjacent lands owned by the U.S. Bureau of Land Management (BLM) due to the known geology of the area along with the proven quality of the aggregate material. CCA initiated an exchange for 225 acres owned by BLM adjacent to the CCA operation. The exchange was possible since it conformed to the *Redding Resource Management Plan* (RMP) approved in July 1993. The decision to approve the land exchange was issued on May 11, 2004. An environmental assessment under the National Environmental Policy Act (NEPA) was prepared and a Finding of No Significant Impact (FONSI) decision was also made on May 11, 2004.

After CCA was able to obtain the 225 acres from BLM, application was made in July 2007 to Shasta County for the following entitlements:

- Amend the General Plan land use designation of two parcels totaling approximately 115 acres from *Natural Resource Protection - Open Space (N-0)* to *Mineral Resource (MR)*;
- Rezone the same 115 acres from *Unclassified (U)* to *Mineral Resource (MR)* zone district;
- Amend the Use Permit for an existing quarry mining operation to extend the termination date of the operation from February 22, 2010 to December 31, 2072, and to expand the quarry area from 53.57 acres to 110.24 acres; and,
- Amend the Reclamation Plan to include expansion of the quarry by 56.67 acres.
- While not an entitlement requiring discretionary action by either the Planning Commission or Board of Supervisors, the Property Line Adjustment was necessary to separate the Reclamation Plan and Use Permit area from other properties owned by the Comingdeer Family.

¹ All the entitlements were approved by the Planning Commission on June 12, 2008 whereas, the General Plan and Zone Amendments were also approved, as required by State law, by the Board of Supervisors on August 5, 2008.

Of the 225 acres acquired from BLM, 115 acres were amended from *Public Land (PL)* to the *Mineral Resource (MR)* General Plan land use classification and rezoned from *Unclassified (U)* district to *Mineral Resource (MR)* district. Within the 115 acres, CCA proposed to mine 56.67 acres. This additional area approved to be mined would have extended the life of the operation another 65 years beyond 2007 to December 31, 2072. Production of up to 250,000 tons per year was approved to occur in six phases encompassing approximately ten years per phase, except for the last phase which was for 15 years. Estimates for completion of each phase were calculated based on the volume which could be sold at maximum production during an average ten year period. However, the actual completion of each phase was not time dependent since the depletion of permitted reserves was based on market demand.

CCA sells about twenty aggregate products. These products include base rock, drain rock, decorative stone, riprap, structural backfill, sand, plaster sand and specialty products. The stone products are desired due to their attractive surfaces and the sand is requested for its attractive golden color. The specialty products are utilized by businesses/public agencies for projects such as golf courses, walking paths and landscaping. A local company uses the sand as a component of a product used as substitute pavement for asphalt surfaced parking lots. The market area for some of CCA's products ranges from Portland, Oregon to the San Francisco Bay Area.

CCA plant facilities include a rock crushing/screening plant, washing operation, mobile office trailer (14 feet by 70 feet), truck scales, diesel fuel storage tanks of 1,000 and 20,000 gallons, one waste oil tank of 350 gallons, two motor oil and one lubricating oil tanks (90 gallons each), and five settling and two recycle ponds. A Reclamation Plan addresses the reclamation of the existing and proposed mined and processing areas. Based on the *County Assessors Annual Production Report* submitted by CCA between the year 1990 and 2017, gravel sold ranged between a low of approximately 48,000 tons in 1990 and a high of approximately 270,000 tons in 2001. CCA employment base is currently comprised of eight full-time and one part-time employee.

PROPOSED PROJECT APPLICATIONS

Crystal Creek Aggregate's proposed project application to Shasta County is for the following actions which involves an overall Project area of 179.97 acres:

- General Plan Amendment of 28.46 acres from *Open Space (N-O)* to *Mineral Resource (MR)* so that a Zone Amendment could be processed for approval of an area that would allow for expansion of the current Project (refer to **Figure 3**).
- Zone Amendment of 28.46 acres from *Unclassified (U)* to *Mineral Resource (MR)* necessary to be consistent with the General Plan Amendment and to allow the processing of a use permit allowing operational expansion (refer to **Figure 3**).
- Use Permit UP 07-20 Amendment to expand the mining area by 69.73 acres from 110.24 to 179.97 acres, expand hours of operation, increase yearly blasting maximums, modify quarry bench heights and widths, and to permit the installation and operation of a hot mix asphalt batch plant (refer to **Use Permit Maps, 3 Pages**).
- Reclamation Plan RP 07-022 Amendment to expand the Reclamation Plan area by 71.10 acres from 108.87 to 179.97 acres and to extend the estimated life of the mining operation by 150 years to Year 2169 (refer to **Reclamation Plan Maps, 6 Pages**).

PROPOSED GENERAL PLAN AND ZONE AMENDMENTS

To be consistent with the requested General Plan land use classification of *Mineral Resource (MR)*, a zone amendment from the *Unclassified (U)* zone district to the *Mineral Resource (MR)* zone district is also requested for 28.46 acres located within current Assessor Parcel No. 065-250-025 which currently encompasses 110.18 acres. The General Plan and Zone Amendments would be compatible with the existing general plan and zoning of the CCA plant operation which is *Manufacturing – Interim Mineral Resource overlay (M-IMR)*. These requested entitlements are supported by the 1997 *Mineral Land Classification for Shasta County* by the State of California Department of Conservation that classified the existing operation and adjacent lands to the west and south as *Mineral Resource Zone Category MRZ-2* “wherein lands classified as MRZ-2 are areas that contain identified mineral resources.” The classification extends beyond the limits of the proposed Reclamation Plan and Use Permit Amendment area. Approval of the *Mineral Resource (MR)* land use classification and zone district designation also provide for land use compatibility with the existing operation. Furthermore, this action preserves and protects a mineral resource of regional and local importance to meet the future needs of the North State and in particular Shasta County.

PROPOSED USE PERMIT & RECLAMATION PLAN AMENDMENTS

As previously discussed, CCA proposes the expansion of CCA operations to 179.97 acres, based on the Reclamation Plan and Use Permit Amendments. However, CCA does not propose additional structures other than the hot mix asphalt batch plant; moving the locations of the existing scales and office, crushing and screen plant, primary and secondary entrances/exits, or creating new settling or recycle wash ponds; or removal of additional aggregate beyond the projected 450,000 CYs (900,000 tons) to be extracted and processed per year.

The addition of a hot mix asphalt batch plant is proposed due to anticipated future market demand in the area and to provide “one stop” aggregate and asphalt related supply material services at a location where access to the west, east south and north is available, particularly for projects along the SR 299 corridor. Furthermore, locating aggregate and asphalt concrete materials at one location reduces vehicle miles traveled not only in the Redding, Anderson and Shasta Lake areas, but throughout Shasta County since aggregate is not hauled to an off-site asphalt plant.

Hot Mix Asphalt (HMA) is created by mixing and heating aggregate with asphalt oil. The type of asphalt plant proposed is a drum mix type that will be powered by propane gas which produces significantly less nitrogen oxide (NOX) emissions (approximately 76 percent less), sulfur dioxide (SO₂) emissions, and some hazardous air pollutants (HAPs) than an oil fired plant.² This process is a continuous mixing type process whereby the dryer is used, not only to dry the material, but also to thoroughly mix the heated and dried aggregates with the liquid asphalt cement. After mixing, the mixture is discharged at the end of the drum and is conveyed to HMA silos where the asphalt is stored. **Use Permit Maps, Page 3 of 3**, conceptually illustrates an asphalt plant configuration.

The CCA mining, crushing, screening and washing operations will function as they currently do except the mining area will be expanded to the west and south to create a quarry area of approximately 102 acres. The pond in the quarry will increase in surface area from 23.5 acres to 66.85 acres. Likewise, the ponds depth will be lowered by 100 feet from the previously approved pond bottom elevation of 700 feet to a proposed elevation of 600 feet. The five existing five settling ponds will remain and the two water recycling ponds will be filled in once aggregate from the quarry is depleted and as part of final Project site reclamation.

² EPA. December 2000. Tables 5 and 8. *Hot Mix Asphalt Plants Emission Assessment Report*

The additional area to be mined will extend the life of the operation another 97 years beyond the currently approved 2072 termination year based on removal of 37,290,000 CYs. However, CCA requests that there be no fixed termination date and instead utilize the removal of up to the 37,290,000 CYs of aggregate as the basis for determining when the mining operation would cease. It is anticipated that extraction will occur in 11 phases encompassing approximately ten years per phase, except for the last phase which could be 15 years. Estimates of completion of each phase are calculated based on the volume which could be sold based on maximum production over a average ten year period. However, as previously noted, actual completion of each phase is not time dependent since the depletion of permitted reserves is based on market demand.

The overburden and topsoil stockpile areas contain material stripped from the quarry as well as reject material from the crushing and screening operation which includes fines generated by the wash plant. Since reclamation is dependent on the availability of finished benches, there could be up to five years' worth of material stored at any given time. Both topsoil and overburden stockpile areas will be subject to best management practices for erosion control to be specified in the Storm Water Pollution Prevention Plan (SWPPP) for the operation. The topsoil and overburden stockpile area will be sited to facilitate reclamation.

Table 1, Reclamation Plan & Use Permit Amendments, Current & Proposed Uses & Operational Changes provides a synopsis of the current operational requirements and those proposed by the Reclamation Plan and Use Permit amendments. **Table 1** provides a comparison between the existing and proposed uses and associated areas, hours of operation, annual and total volume of aggregate extraction, and the proposed asphalt batch plant yearly output, etc.

TABLE 1 RECLAMATION PLAN & USE PERMIT AMENDMENTS CURRENT & PROPOSED USES & OPERATIONAL CHANGES & REQUIREMENTS	
Current	Proposed
Reclamation Plan area – 108.87 acres Use Permit area – 110.24 acres ³ Quarry Mining area – 47.2 acres	Reclamation Plan area – 179.97 acres Use Permit area – 179.97 acres Quarry Mining area – 102 acres
Uses: 1. Aggregate mining 2. Aggregate crushing, screening, and washing ⁴ 3. Loading & off-site sale of sand, gravel & rock 4. Material stockpiling 5. Importation of topsoil to the Project site 6. Blasting	Uses: 1. Aggregate mining 2. Aggregate crushing, screening, and washing 3. Loading & off-site sale of sand, gravel & rock 4. Material stockpiling 5. Importation of topsoil to the Project site 6. Blasting 7. Asphalt plant – Manufacture 200,000 tons of asphalt concrete (AC) 8. Use of reclaimed asphalt pavement (RAP) when required ⁵ 9. Use of rubberized asphalt concrete (RAC) when required ⁶ 10. Importation and recycling of 50,000 cubic yards (CY) of used concrete or AC when required

³ The difference in acreages is due to the June 12, 2008 Staff Report for UP 07-020 to the Planning Commission identifying an area of 110.24 acres, whereas, the Reclamation Plan Maps identify a 108.87 acre area. The difference is insignificant.

⁴ Use Permit Minor Modification UP 07-020 M1 and Reclamation Plan Minor Modification RP 07-002 M1, dated May 16, 2012

⁵ Caltrans may require a certain percentage of RAP in the production of AC.

⁶ Caltrans and some cities and counties may require a certain percentage of RAC in the production of AC.

TABLE 1 RECLAMATION PLAN & USE PERMIT AMENDMENTS CURRENT & PROPOSED USES & OPERATIONAL CHANGES & REQUIREMENTS	
Current	Proposed
Volume of aggregate to be mined – 7.96 MCYs or 15,92 MTs	Volume of aggregate to be mined – 37.29 million cubic yards (MCYs) or 74.58 million tons (MTs)
Maximum permitted annual tonnage of processed aggregate is limited to 125,000 CYs (250,000 tons)	Maximum annual tonnage of processed aggregate to be limited to 450,000 CYs (900,000 tons)
Average volume of aggregate mined – 100,000 CYs (200,000 tons) – not a permit requirement	Average volume of aggregate mined – 250,000 CYs (500,000 tons)
Importation of material restriction 50,000 CYs (100,000 tons) of topsoil/year	Importation of material restriction 50,000 CYs (100,000 tons) of topsoil/year
Mining termination date – December 31, 2072	Mining termination date – June 15, 2169
Maximum quarry bench size – 22 ft. high by 30 ft. wide	Maximum quarry bench size – 40 ft. high x 40 ft. wide
Employees – 8 full-time & 1 part-time	Employees – 14 full-time & 1 part-time
Mining hours of operation: <ul style="list-style-type: none"> • 6 a.m. to 5 p.m. Monday – Saturday PST • 6 a.m. to 6 p.m. Monday – Friday PDT • 6 a.m. to 5 p.m. – Saturday PDT 	Mining hours of operation: <ul style="list-style-type: none"> • 6 a.m. to 5 p.m. Monday – Saturday PST • 6 a.m. to 8 p.m. Monday – Friday PDT • 6 a.m. to 5 p.m. – Saturday PDT Asphalt batch plant hours of operation: <ul style="list-style-type: none"> • Only during PST – 24 hours per day – Sunday evening/ Monday morning except for Saturday evening/Sunday morning. No restrictions for public works projects
Blasting per year – 12 times only between 9:30 a.m. to 3:30 p.m., Monday – Friday	Blasting per year – 40 times only between 9:30 a.m. & 3:30 p.m., Monday – Friday with minimum two-week notice to the Planning Division
Truck traffic on Iron Mountain Road: <ul style="list-style-type: none"> • Average 45 round trips. • Maximum 220 round trips. 	Truck traffic on Iron Mountain Road: <ul style="list-style-type: none"> • To Be Determined
Agreement for extraordinary maintenance of Iron Mountain Road	Agreement with the Department of Public Works for extraordinary maintenance of Iron Mountain Road
Wetland mitigation – 1.8 acres of marshes, wetland & riparian habitat (SMARA requires a minimum mitigation ratio of 1:1)	Wetland mitigation – To Be Determined
Originally approved for propane – converted to PG&E power in 2011	PG&E power

As previously discussed, the existing pond in the quarry will increase in surface area from approximately 23.5 acres to 66.85 acres and the depth will be lowered by 100 feet. The existing five settling ponds will remain and the two water recycling ponds will be filled in once aggregate from the quarry is depleted and as part of final Project site reclamation. For accuracy and completeness, it should be noted that the existing ponds and the expansion of the quarry pond are not regulated as “waters of the United States” pursuant to the federal Clean Water Act (CWA). Regulatory guidance from 1986 on, now adopted as part of the 2015 “Definition of ‘Waters of the United States’; Final Rule,” (80 FR 37054, 37098) describes features that are not “waters of the United States.” The Rule is in force in California, and excludes the following features:

- Artificial, constructed lakes or ponds created by excavating and/or diking dry land such as farm and stock watering ponds, irrigation ponds, settling basins, log cleaning ponds, cooling ponds, or fields flooded for rice growing

- Water-filled depressions created in dry land incidental to mining or construction activity, including pits excavated for obtaining fill, sand or gravel that fill with water (80 FR 37098)

The above descriptions apply to not only the; quarry pond, the five settling ponds and two recycling ponds but also to the various water-filled depressions throughout the Project site created by the existing mining operation. CCA proposes retaining the ponds, but not the depressions, and adding and protecting riparian habitat around the ponds as part of the project's reclamation plan. Because they are not federally regulated, this can be accomplished without first securing CWA authorization.

Wildland Resources Managers prepared the July 2019 "Biological Review Crystal Creek Aggregate Mine Expansion, Shasta County, California" which identifies the ponds. The report provides detailed information about "the present conditions of soils, vegetation, wetlands, [and] wildlife habitats," including how the project area was affected by the Carr fire. This information helps fulfill CEQA's goal of disclosing relevant information about the baseline conditions. Project impacts on these features does not depend on whether they are subject to particular government jurisdiction.⁷

Reclamation Plan Topics

As previously noted, the proposed Use Permit Amendment also requires an amendment to the currently approved Reclamation Plan. The Reclamation Plan describes the final post-reclamation condition of the site and the procedures which will be employed to reclaim the site. The Reclamation Plan addresses the following topics some of which are discussed in this Project Description.

- Reclamation Objectives
- Existing Conditions
- Establishment of Test Plots
- Phasing
- Reclamation Prescriptions
- Post-vegetation Monitoring
- Additional Reclamation Policies

Reclamation Plan Objectives

There are two types of end use objectives for the Project site resulting in different reclamation prescriptions. There is the eastern plant site area of 46.29 acres and the middle and western Project area of 133.68 acres. These prescriptions are as follows:

Industrial Use Area: The eastern area will be reclaimed to industrial uses after mining operations terminate. This end use would be consistent with both the current and proposed general plan land use designation and zoning classification.

Mineral Reserve Area: The middle and western side of the Project site will be reclaimed as a mineral reserve area. This use is consistent with the California Department of Conservation's classification of the site as *Mineral Resource Zone (MRZ-2)*.

⁷ The report is on file with the Shasta County Planning Division.

The reclamation program primary objectives are to; (a) establish a new visually pleasing vegetative cover that provides future fire protection; (b) stabilize the finished mined surfaces and prevent erosion; and, (3) revegetate with plant species adapted to this locale.

Phasing

The purpose of phasing for this Reclamation Plan Amendment is to divide the progression of mining into clearly identifiable mining segments since the depletion of permitted reserves is based on market demand, which is difficult to forecast. This allows reclamation to be started as soon as finished mining surfaces are completed and no longer needed by the operation except under certain circumstances. An example would be a quarry bench where finished grade is reached and the bench is resoiled and vegetated, except in areas on the bench where access by employees and equipment still needs to access a future mining area phase.

Phasing allows for reclamation to be started as soon as each segment is completed. The newly established vegetation will grow even as mining continues, minimizing visible indications of the activities and resulting in a variety of vegetation patterns surrounding the larger 66.85 acre quarry pond. Phasing also assists responsible and trustee agencies to determine compliance with the Reclamation Plan since reclamation areas are specifically defined. **Reclamation Plan Maps, Page 4 of 6** provides an overview of the phasing.

Table 2, Mining Phases & Volumes identifies the proposed 11 phases and associated volume of material based on the extraction and processing of 450,000 CYs (900,000 tons) per year.

Phase	Reserves	Cumulative Total
1	2.68	2.68
2	2.77	5.45
3	2.29	7.75
4	2.27	10.02
5	2.30	12.31
6	2.72	15.03
7	2.15	17.18
8	2.79	19.97
9	1.80	21.77
10	2.94	24.71
11	12.59	37.29

Phases 1 through 10 contain 24,700,000 CYs of aggregate, about 66 percent of the resource, located in the quarry that is above the pond surface. Phase 11 is the mine area below the 66.85 acre pond surface that contains 12,590,000 CYs of aggregate (34%). Mining begins in Phase 1 and terminates in Phase 10. However, Phase 11 “located” under the 10 phases can be mined at any time during the Reclamation Plan period since the mining of Phase 11 is dependent on the need for the particular type of rock sought for construction activities. Mining operational issues, such as coordination of dewatering activities with mining and the blending of surface and below surface materials, also influence the timing for removing aggregate in Phase 11. Phases 1 through 10 have nearly equal amounts of reserves, which vary between 2,150,000 CYs to 2,940,000 CYs.

Reclamation Prescriptions

Reclamation prescriptions deal with various operational components which include the plant site, quarry benches and their revegetation, ponds, and reclamation within the plant area, such as removing equipment that will not be utilized for future permitted industrial uses, clean up, final grading, filling of the recycle ponds, and post vegetation monitoring. The revegetation of benches provides a fulfillment of one of the primary objectives of the reclamation program to establish a new visually pleasing vegetative cover that provides future fire protection.

A Revegetation Plan for the quarry benches was prepared to create, not only an aesthetically pleasing reclamation feature, but to also establish a fire resistant plant community on the quarry benches.⁸ The 2018 Carr Fire devastated most of the vegetation and homes in the area efforts need to be undertaken not to repeat the event that occurred. The reclamation plan presents an opportunity to lower the fire danger in the area.

One of the main methods to achieve this goal is to eliminate fuel ladders where fire proceeds from lower vegetation into the crowns of trees. By reducing the amount of flammable material present (fuel load) this reduces the spread of fires. To achieve these goals brush species are eliminated from the plant pallet. In its place, the planting of ponderosa pines, grasses and forbs is proposed. Ponderosa pines were selected since they are indigenous to the area and grow in many locations. The trees will be initially planted with 8 foot by 8 foot spacing and then thinned out at a future date. The final upland bench planting would be pines trees spaced 20 to 30 feet apart with grasses and forbs as the understory species. The spacing of the trees reduces, not only the fuel load, but also the fuel ladder which could result in fire spreading from one tree to the other. The grasses and forbs pallet include plants required for erosion control.

Also addressed as a reclamation prescription is to establish a self-sustaining population of wetland/riparian vegetative species on the waterside of the lowest final bench, within 16 feet of the water's edge around the shoreline of the new quarry pond. Clusters of native willows and cottonwoods would be planted along the pond bank. Average spacing of the clusters are to be 110 feet on-center with 6 to 10 trees per cluster. Rock jetties would be placed along the bank and woody debris would be placed along the waterline, where feasible.

Additional Reclamation Policies

Additional reclamation policies address erosion and sediment control policies, topsoil and overburden policies, and other specific final reclamation procedures dealing with interior haul roads, stockpiles, general plant areas to be reclaimed and monitoring.

CEQA PROJECT OBJECTIVES

In accordance with State CEQA Guidelines §15124(b), a clear statement of objectives and the underlying purpose of the project shall be discussed. The project applicant has identified the following objectives for the proposed project:

1. Provide a comprehensively planned project that will continue to accommodate projected growth in construction related activities and related services, and also serve to help meet the current and future demands for Portland cement concrete grade aggregate and asphalt materials in Shasta County and the north state.

⁸ Wildland Resource Managers. May 2019. Revegetation Plan for Crystal Creek Aggregate Mine Expansion, Shasta County California. On file with the Shasta County Planning Division.

2. Expand an existing aggregate mining operation located in a known Mineral Resource Zone Category MRZ-2 “wherein lands classified as MRZ-2 are areas that contain identified mineral resources” as identified in the 1997 Mineral Land Classification for Shasta County by the State of California Department of Conservation.
3. Expand the existing aggregate mining operation to permit the installation and operation of a hot mix asphalt batch plant to provide “one stop” aggregate and asphalt related supply material services at a location in close proximity to the State Highway System whereby access is available to the west, east south and north and particularly for projects along the SR 299 corridor.
4. Expand the existing aggregate mining operation that continues to be compatible and complimentary of the existing open space areas immediately to the south, west and northwest of the project site and the industrial uses to the northeast and east of the project site.
5. Contribute to the improvement of the Shasta County economy by expanding a project that will increase sales taxes.

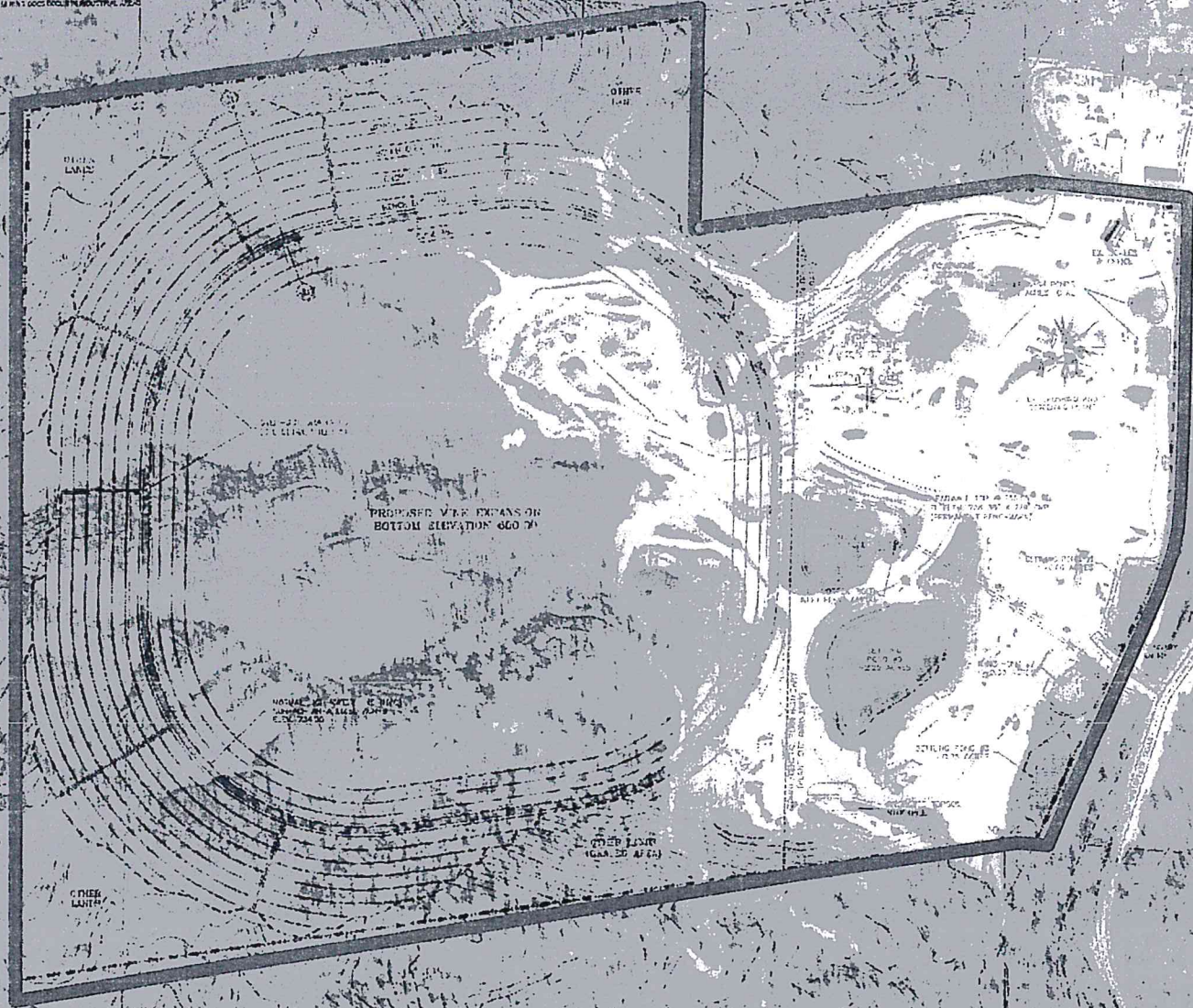


FIGURE 1 – PROJECT LOCATION

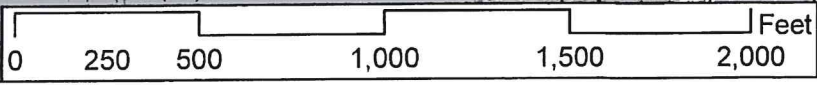
AERIAL OF MINE SITE

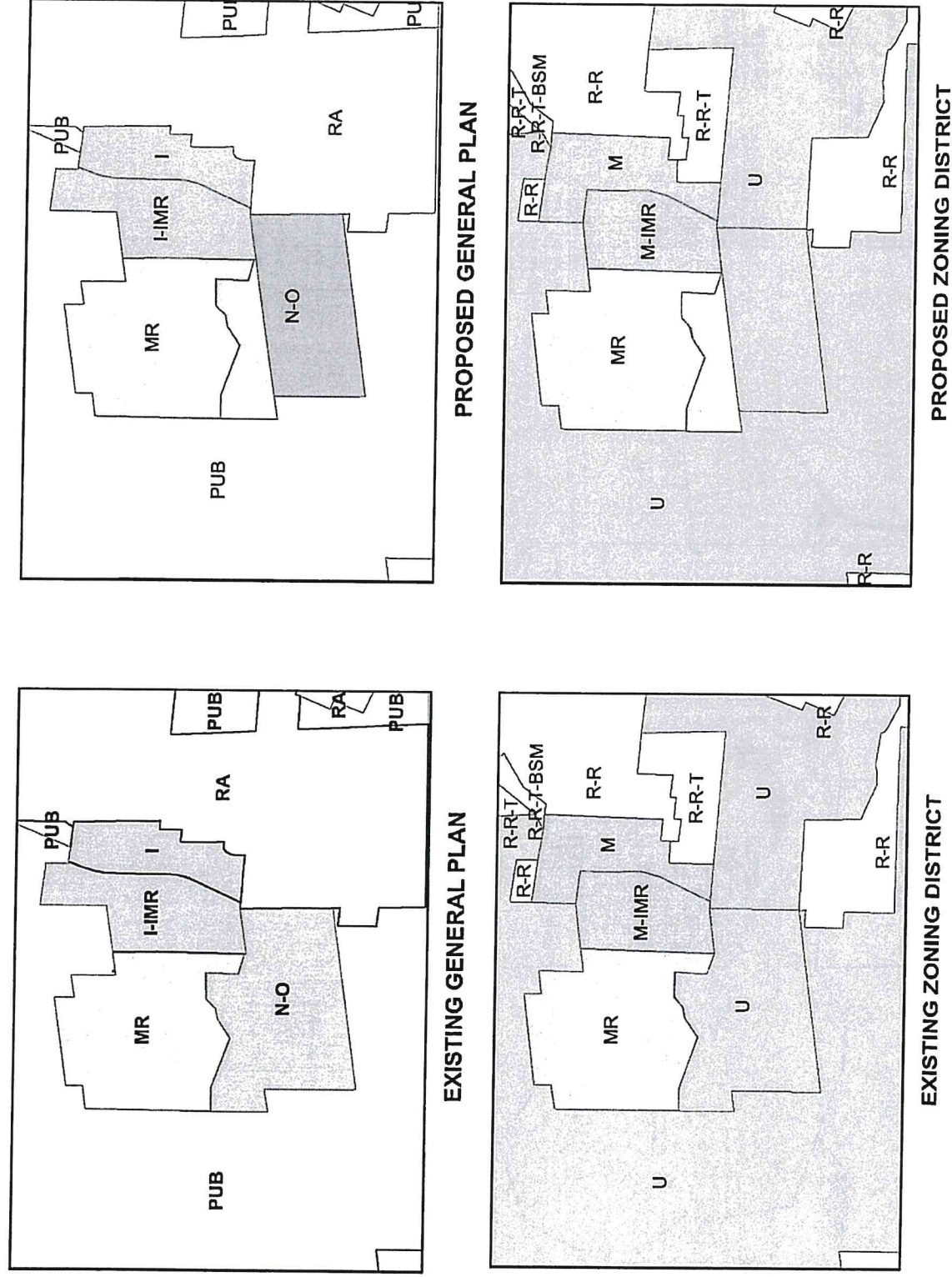


UNCLASSIFIED
A. U.S. PATENT RIGHTS RESERVED



Source: Esri,

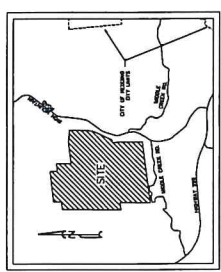




General Plan and Zoning Mapping by The Land Designers



FIGURE 3 – EXISTING & PROPOSED GENERAL PLAN & ZONING DISTRICT



VICINITY MAP
NOT TO SCALE

UNITS: NAD 83
 CONTOUR INTERVAL: 5 FT
 JERRY DALE & KERRY A TRUST
 LAND DESIGNERS, INC.
 1975 PLACER ST, SUITE A
 SAN JUAN BAPTIST
 SUITE 200
 15301 244-0901
 530-244-0506

UNITS: NAD 83
 SUITE 200
 CIVIL ENGINEER, INC.
 PO BOX 1307
 SAN JUAN BAPTIST
 95607
 (530) 365-5100

APN	AREA (ACRES)	PARCEL TABLE	EX ZONING
065-250-002	28.18	1-MR (Industrial; Interim Minimum)	1-MR (General Industrial; Interim Minimum)
065-250-024	6.74	MR (General Minimum)	MR (General Minimum)
065-250-025	98.48	MR (General Minimum)	MR (General Minimum)
PORTION OF 065-250-028	28.46	N-O (Open Space)	O (Undesignated District)
065-260-010	17.10	1-MR (Industrial; Interim Minimum)	1-MR (General Industrial; Interim Minimum)



LEGEND

-----	RECORD BOUNDARY	-----	(EX) RECLAMATION BOUNDARY
-----	ADJACENT BOUNDARY	-----	(N) RECLAMATION BOUNDARY
-----	ROW BOUNDARY	-----	(O) PROPOSED QUARRY UNITS
-----	APN BOUNDARY	-----	(EX) PONDS
-----	ZONING BOUNDARY	-----	(EX) ROAD
-----	40' CG CONTOURS	-----	(EX) STOCKPILE AREAS
-----	(EX) IRRIGATION COURSES	-----	(EX) STOCKPILE AREAS & GENERAL PLAN AMENDMENT
-----	(EX) COLLECT		

LOCATED IN SECTION 30, TOWNSHIP 32 NORTH, RANGE 3 WEST, S.D.M. IN THE UNINCORPORATED CITY OF SHASTA COUNTY, CALIFORNIA

Shasta County
 Crystal Creek Aggregate, Inc.
 Project Plan

DATE	8/27/19	BHEET	1
DRAWN BY	DIANE K. MILLER	CHECKED BY	
DESIGNED BY	CIVIL ENGINEER, INC.	APPROVED BY	
DRAWN FOR	417-300024	SCALE	1" = 250'
DATE	8/27/19	OF	1



PLANS PREPARED UNDER THE SUPERVISION OF:

AMENDMENT TO RECLAMATION PLAN NO. 07602 AND USE PERMIT NO. 074920, FOR THE PROPOSED QUARRY AND ZONE AMENDMENT

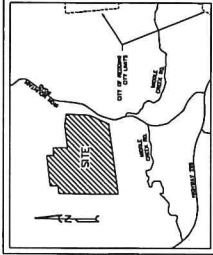


NO.	DATE	REVISIONS	DESCRIPTION	BY

UNDERGROUND SERVICE ALERT



CALL BEFORE YOU DIG



VICINITY MAP
NOT TO SCALE

OWNER:
COMBINEDER FAMILY TRUST
JERRY DALE & KERRY M TRUST
10938 IRON MOUNTAIN ROAD
SUN VALLEY, CA 94001
530-224-7283

DESIGNER:
DUANE K MILLER
CIVIL ENGINEER, INC.
PO BOX 1307
SUN VALLEY, CA 94007
530-365-5410

CONSULTANT:
LAND DESIGNERS, INC.
1975 PLACER ST. SUITE A
SUN VALLEY, CA 94001
530-244-0506

AGENCY:
SUN VALLEY
665-250-023
665-250-024
665-250-025
665-250-026 (PORTION)
665-260-010

APN	AREA (ACRES)	EX. GENERAL PLAN (Use, (Use/Zone), Interim District)	EX. ZONING (Use, (General Industrial/ Interim District Resource))
065-250-002	28.19	UR (General Resource)	UR (General Resource)
065-250-024	6.74	UR (General Resource)	UR (General Resource)
065-250-025	38.48	UR (General Resource)	UR (General Resource)
PORTION OF 065-250-026	28.46	M-O (Open Space)	U (Unclassified District)
065-280-010	17.10	M-UR (Industrial/ Interim District)	M-UR (General Industrial/ Interim District Resource)

- LEGEND**
- RECORD BOUNDARY
 - ADJACENT BOUNDARY
 - APN BOUNDARY
 - ROW BOUNDARY
 - 10' CG CONTOURS
 - (EX) DRAINAGE COURSES
 - (EX) CULVERT
 - (EX) LANDSCAPING
 - (EX) PONDS
 - (EX) STOCKPILE AREAS
 - (EX) QUARRY AREA
 - (EX) 30' PROJECT ENTRY ROAD
 - (EX) 30' PROJECT DRIVEWAY & PARKING
 - (EX) TRUCK ROUTE (20'-40' WIDE)
 - ACCESS TRAILS

LOCATED IN SECTION 36, TOWNSHIP 33N, RANGE 12E, CALIFORNIA
IN THE UNINCORPORATED TERRITORY
OF SHASTA COUNTY, CALIFORNIA

AMENDMENT TO
UP NO. 07-020

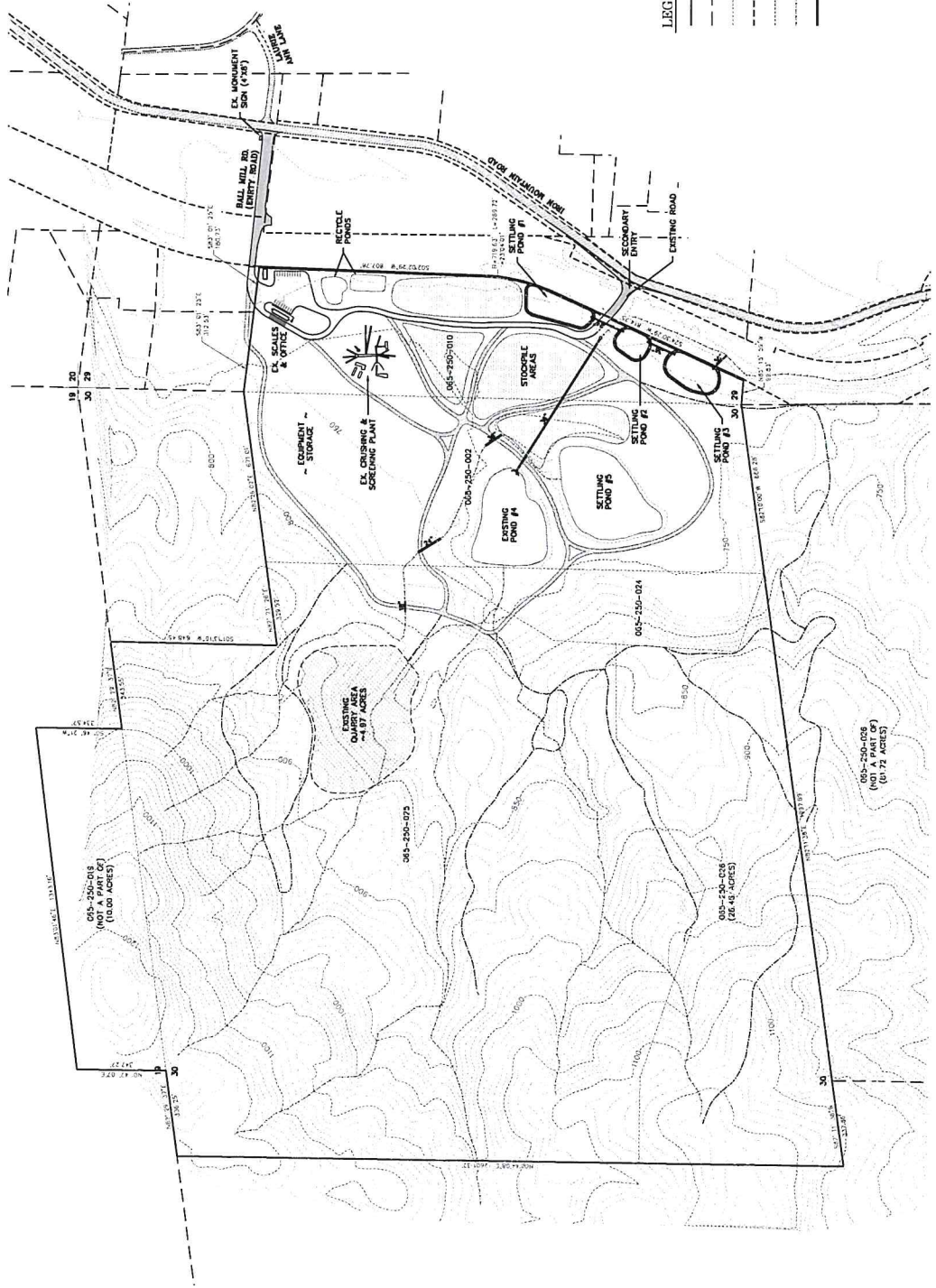
Shasta County
Crystal Creek Aggregate, Inc.
Use Permit Existing Conditions

DUANE K MILLER
CIVIL ENGINEER, INC.
1472 HUNTER WAY UNIT 1
SUN VALLEY, CA 94001
530-365-5410
DUANEK.COM

DATE: 8/27/19
SHEET: 1
SCALE: OF
1" = 200'



PLANS PREPARED UNDER
THE SUPERVISION OF:



- SHEET INDEX**
- USE EXISTING CONDITIONS
 - USE PERMIT SITE PLAN
 - USE PERMIT DETAILS



NO.	DATE	DESCRIPTION	BY

UNDERGROUND SERVICE ALERT
811
1-800-227-5800
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NO.	DATE	DESCRIPTION	BY



- LEGEND**
- PROPERTY LINE
 - ADJACENT PARCEL
 - LIMITS OF QUARRY
 - (EX) DRAINAGE COURSES
 - (EX) CULVERT
 - (M) BENCH LP
 - (M) HIGH WATER LINE
 - 10' FC CONTOUR
 - (EX) 30' PROJECT ENTRY ROAD
 - (EX) 20' PROJECT ENTRY ROAD
 - (EX) TRUCK ROUTE (20'-40' WIDE)
 - (EX) TRUCK ROUTE (20'-40' WIDE)
 - (M) 20' QUARRY ROAD
 - DRAINAGE ARROW



AMENDMENT TO
UP NO. 07-020

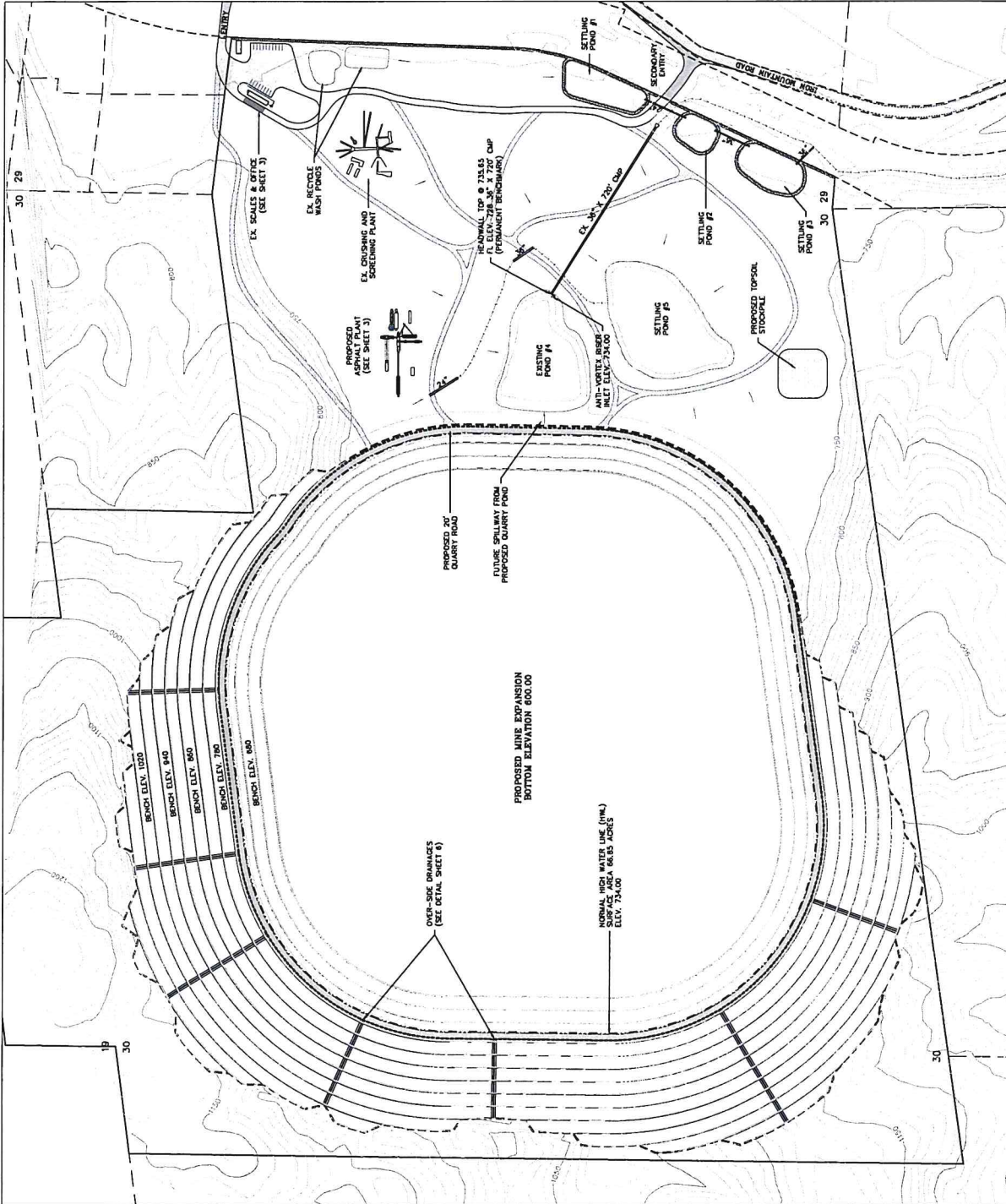
Shasta County
Crystal Creek Aggregate, Inc.

Use Permit Site Plan

DATE: 9/27/19
SHEET: 2 OF 3
SCALE: 1" = 200'

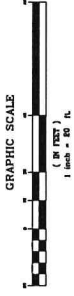
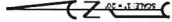
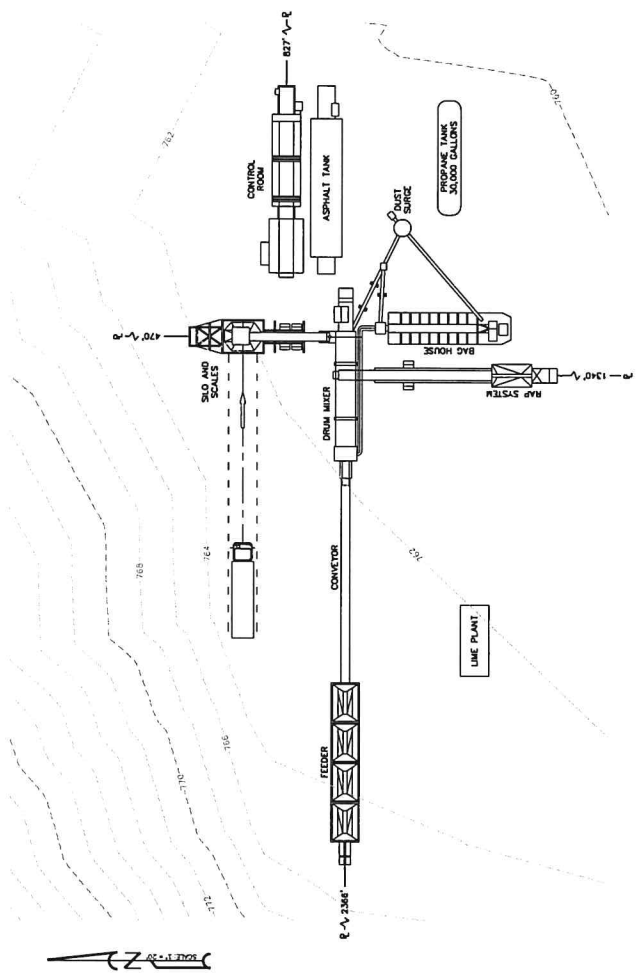
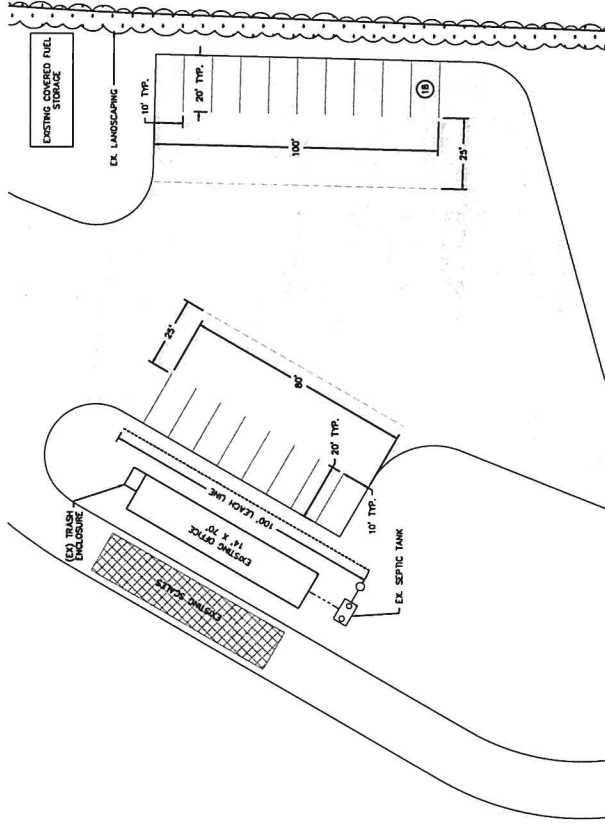
PLANS PREPARED UNDER THE SUPERVISION OF:

DIANE K. MILLER
CIVIL ENGINEER INC.
417 HARRISON ST. SUITE 1
HARRISON CA 95725
DIRECTOR OF CIVIL ENGINEERING



NOTES

1. THE LAYOUT SHOWN BELOW IS AN APPROXIMATION FOR PLANNING PURPOSES ONLY.
2. DIMENSIONS SHOWN ON THIS PLAN ARE APPROXIMATE IN INCHES.
3. LANDSCAPING COMPRISED OF REDWOOD TREES AND PERENNIAL PLANTS TO BE PLACED IN BETWEEN.
4. NO LANDSCAPING OR VEGETATION ALONG IRON MOUNTAIN ROAD.



UNDERGROUND SERVICE ALERT
 1-800-227-5000
 CALL BEFORE YOU DIG



NO.	DATE	REVISIONS DESCRIPTION	BY

**AMENDMENT TO
 UP NO. 07-020**

Shasta County
 Crystal Creek Aggregate, Inc.

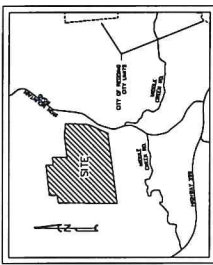
Details

DATE: 8/27/19
 SHEET: 3
 SCALE: OF
 1" = 20'

DUANE K. MILLER
 CIVIL ENGINEER, INC.
 4172 JACOBSON WAY, SUITE 1
 MARIETTA, GA 30067
 404-842-4424
 DERMERSIE.COM

PLANS PREPARED UNDER THE SUPERVISION OF:





VICINITY MAP
NOT TO SCALE

LAND PLANNER
LAND PLANNER
 10936 IRON MOUNTAIN ROAD
 REDDING, CA 96001
 (530) 224-1263

MINERALS
 085-250-002
 085-250-025
 085-250-026 (PORTION)
 085-260-010

ALUMINA
 085-250-002
 085-250-025
 085-250-026 (PORTION)
 085-260-010

CIVIL ENGINEER, INC.
 10936 IRON MOUNTAIN ROAD
 REDDING, CA 96001
 (530) 362-5610

APN	AREA (ACRES)	EX. GENERAL PLAN	EX. ZONING
085-250-002	28.19	M-ME (Industrial/ Interim Mineral)	M-ME (General Industrial/ Interim Mineral Resource)
085-250-024	8.74	UR (Mineral Resource)	UR (Mineral Resource)
085-250-025	85.48	UR (Mineral Resource)	UR (Mineral Resource)
085-250-026	28.46	N-O (Open Space)	U (Undesignated District)
085-260-010	17.10	M-ME (Industrial/ Interim Mineral)	M-ME (General Industrial/ Interim Mineral Resource)

- LEGEND**
- (E1) LANDSCAPING
 - (E2) PONDS
 - (E3) STOCKPILE AREAS
 - (E4) QUARRY AREA
 - (E5) 30' PROJECT
 - (E6) 30' ON-SITE DRIVEWAY & PARKING
 - (E7) UNIMPROVED SITE
 - (E8) 30' WAD
 - (E9) UNIMPROVED SITE ACCESS TRAILS
- RECORD BOUNDARY** (Dashed line)
- ADJACENT BOUNDARY** (Dotted line)
- APN BOUNDARY** (Solid line)
- 10' 00' CONTOURS** (Dashed line)
- (E1) RECLAMATION BOUNDARY** (Dashed line)
- (N) RECLAMATION BOUNDARY** (Dashed line)
- (E4) DRAINAGE PATH** (Dashed line)
- (E4) CULVERT** (Dashed line)
- (E5) SEISMIC LINES (APPROXIMATE)** (Dashed line)

AMENDMENT TO RECLAMATION PLAN NO. 07-002

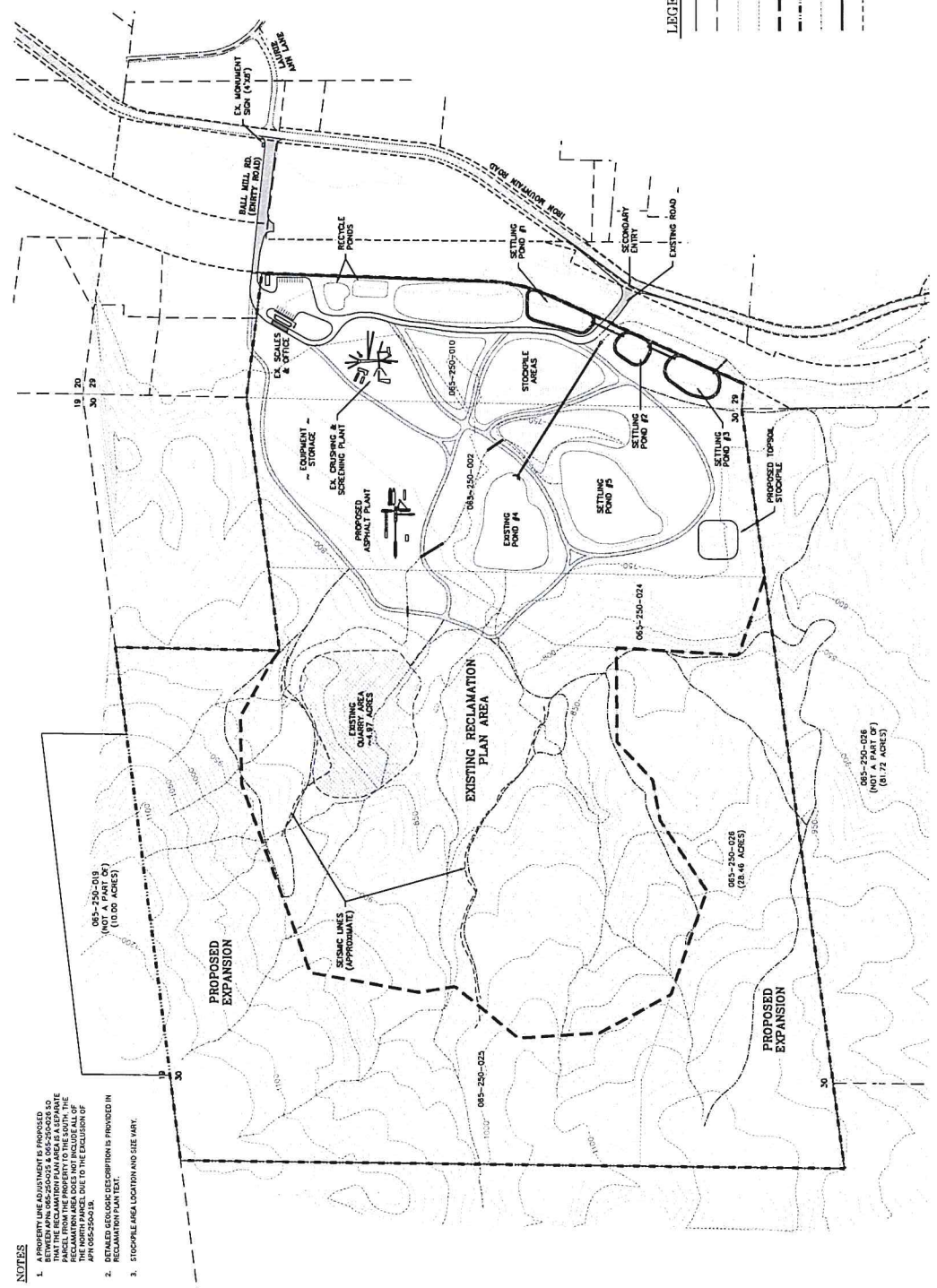
LOCATED IN SECTION 30, TOWNSHIP 36N, RANGE 12E, COUNTY OF SHASTA COUNTY, CALIFORNIA

Shasta County
 Crystal Creek Aggregate, Inc.

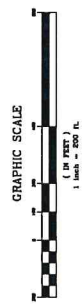
Cover Sheet

DATE: 8/27/19
 SHEET: 1
 OF: 6

DIANNE K. MILLER
 CIVIL ENGINEER, INC.
 417 AMERICAN CA. HWY 1
 DUNSMITH, CA 96028
 (530) 238-1111



- SHEET INDEX**
1. COVER SHEET
 2. MINING PLAN
 3. CROSS SECTIONS
 4. PHASING PLAN
 5. RECLAMATION PLAN
 6. DETAILS



MINING QUANTITIES

RECLAMATION AREA:	139.97 ACRES
AREA MINED:	110.89 ACRES
VOLUME:	37,293 MILLION CY.

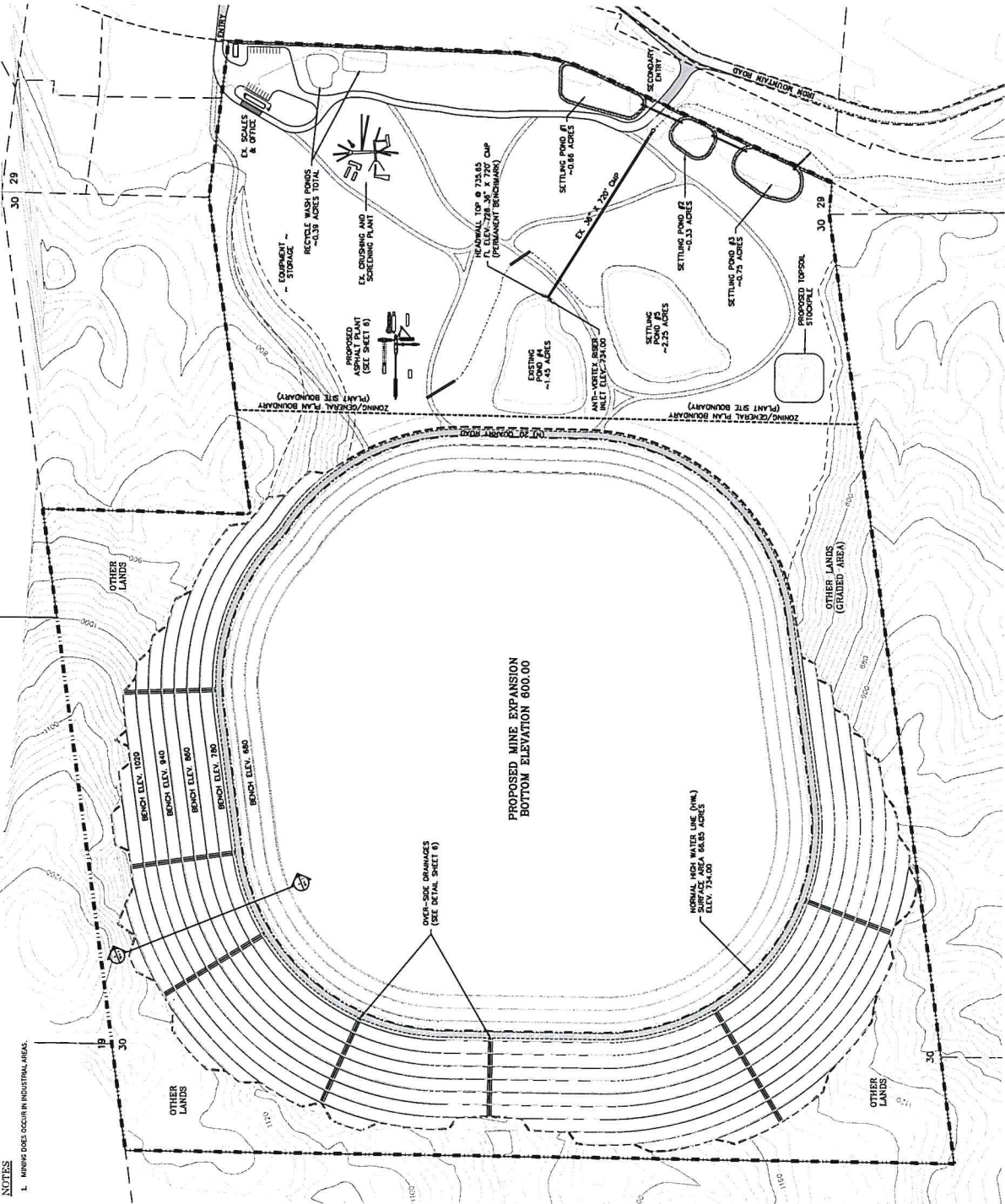
- NOTES**
1. PROPERTY LINE ADJUSTMENT IS PROVIDED BETWEEN APN 085-250-025 & 085-250-028 SO THAT THE ENTIRE QUARRY AREA IS WITHIN ONE PARCEL FROM THE PROPERTY TO THE EAST. THE RECLAMATION AREA DOES NOT INCLUDE ALL OF APN 085-250-018.
 2. DETAILED GEOLOGIC DESCRIPTION IS PROVIDED IN RECLAMATION PLAN TEXT.
 3. STOCKPILE AREA LOCATION AND SIZE VARY.

REVISIONS

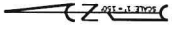
NO.	DATE	DESCRIPTION	BY

NOTES

1. MINING DOES OCCUR IN INDUSTRIAL AREAS.



REVISIONS			
NO.	DATE	DESCRIPTION	BY

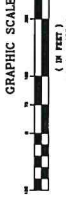


LEGEND

- PROPERTY LINE
- ADJACENT PARCEL
- REC PLAN BOUNDARY
- LIMITS OF QUARRY
- (EX) DRAINAGE PATH
- (EX) CONDUIT
- (N) SLOPE TE-IN
- (N) BENCH UP
- (N) HIGH WATER LINE
- 10' FC CONDUIT
- (EX) 30' PROJECT ENTRY ROAD
- (EX) 10' SITE ACCESS DRIVE
- (EX) TRACK ROUTE (20'-40' WIDE)
- (EX) UNIMPROVED SITE ACCESS TRAILS
- (N) 20' QUARRY ROAD

LAND USE TOTALS

- PLANT SITE & STOCKPILES: 46.83 ACRES
- QUARRY AREA: 102.25 ACRES
- OTHER LANDS: 30.89 ACRES
- TOTAL: 179.97 ACRES



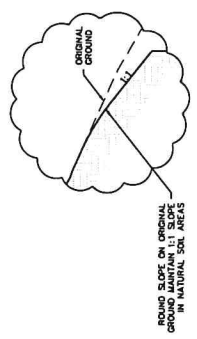
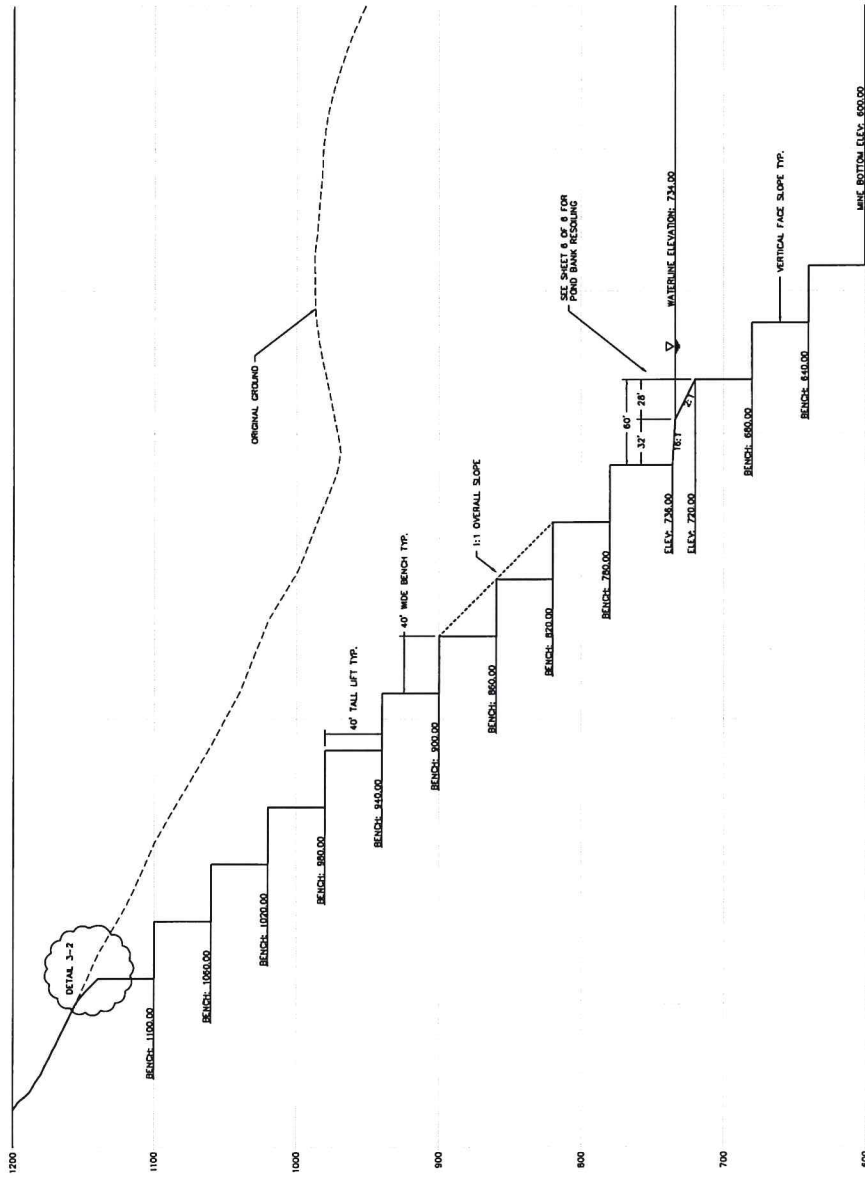
AMENDMENT TO RECLAMATION PLAN NO. 07-002

Shasta County Crystal Creek Aggregate, Inc. Mining Plan	
DUANE K. MILLER CIVIL ENGINEER, INC. 4172 MITCHELL WAY, SUITE 1 REDFORT, CA 95177 408-363-8929 DOKUMENT.COM	DATE: 8/27/19 SHEET: 2 SCALE: AS SHOWN OF: 6 1" = 150'



PLANS PREPARED UNDER THE SUPERVISION OF:

REVISIONS		
NO.	DATE	DESCRIPTION



NOTE:
PARENT MATERIAL TO DICTATE FINAL SLOPE.

3:2 SLOPE DETAIL
SCALE 1"=20'



AMENDMENT TO
RECLAMATION PLAN
NO. 07-002

Shasta County
Crystal Creek Aggregate, Inc.

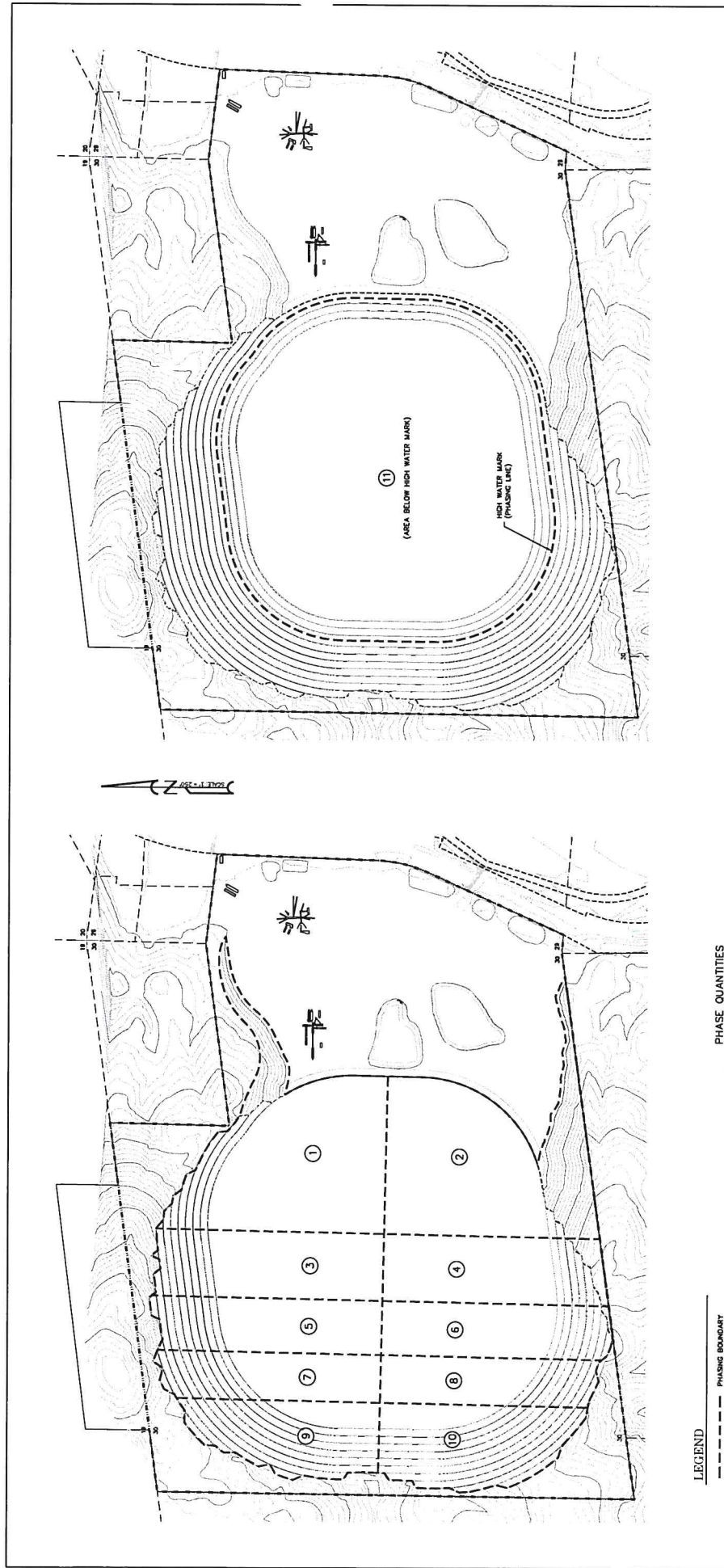
PLANS PREPARED UNDER THE SUPERVISION OF:

DIANE K. MILLER
CIVIL ENGINEER, INC.
1412 MARSHALL AVENUE
ANTHONY, CA 95721
PHON: 530-537-7171
FAX: 530-537-7171

DATE: 9/27/19
SHEET: 3 OF 6
SCALE: 1" = 40'

STATION	ELEVATION	STATION	ELEVATION
0+00	75 1210.57	3+00	75 824.00
0+10	75 1180.85	3+10	75 824.00
0+20	75 1155.89	3+20	75 824.00
0+30	75 1131.30	3+30	75 824.00
0+40	75 1104.00	3+40	75 824.00
0+50	75 1078.24	3+50	75 824.00
0+60	75 1050.00	3+60	75 824.00
0+70	75 1023.00	3+70	75 824.00
0+80	75 998.00	3+80	75 824.00
0+90	75 974.00	3+90	75 824.00
1+00	75 950.00	4+00	75 912.00
1+10	75 927.35	4+10	75 912.00
1+20	75 905.00	4+20	75 894.50
1+30	75 884.00	4+30	75 874.00
1+40	75 864.00	4+40	75 854.00
1+50	75 844.00	4+50	75 834.00
1+60	75 824.00	4+60	75 814.00
1+70	75 804.00	4+70	75 794.00
1+80	75 784.00	4+80	75 774.00
1+90	75 764.00	4+90	75 754.00
2+00	75 744.00	5+00	75 734.00
2+10	75 724.00	5+10	75 724.00
2+20	75 704.00	5+20	75 714.00
2+30	75 684.00	5+30	75 704.00
2+40	75 664.00	5+40	75 694.00
2+50	75 644.00	5+50	75 684.00
2+60	75 624.00	5+60	75 674.00
2+70	75 604.00	5+70	75 664.00
2+80	75 584.00	5+80	75 654.00
2+90	75 564.00	5+90	75 644.00
3+00	75 544.00	6+00	75 624.00
3+10	75 524.00	6+10	75 604.00
3+20	75 504.00	6+20	75 584.00
3+30	75 484.00	6+30	75 564.00
3+40	75 464.00	6+40	75 544.00
3+50	75 444.00	6+50	75 524.00
3+60	75 424.00	6+60	75 504.00
3+70	75 404.00	6+70	75 484.00
3+80	75 384.00	6+80	75 464.00
3+90	75 364.00	6+90	75 444.00
4+00	75 344.00	7+00	75 424.00
4+10	75 324.00	7+10	75 404.00
4+20	75 304.00	7+20	75 384.00
4+30	75 284.00	7+30	75 364.00
4+40	75 264.00	7+40	75 344.00
4+50	75 244.00	7+50	75 324.00
4+60	75 224.00	7+60	75 304.00
4+70	75 204.00	7+70	75 284.00
4+80	75 184.00	7+80	75 264.00
4+90	75 164.00	7+90	75 244.00
5+00	75 144.00	8+00	75 224.00
5+10	75 124.00		
5+20	75 104.00		
5+30	75 84.00		
5+40	75 64.00		
5+50	75 44.00		
5+60	75 24.00		
5+70	75 4.00		
5+80	75 14.00		
5+90	75 24.00		
6+00	75 34.00		
6+10	75 44.00		
6+20	75 54.00		
6+30	75 64.00		
6+40	75 74.00		
6+50	75 84.00		
6+60	75 94.00		
6+70	75 104.00		
6+80	75 114.00		
6+90	75 124.00		
7+00	75 134.00		
7+10	75 144.00		
7+20	75 154.00		
7+30	75 164.00		
7+40	75 174.00		
7+50	75 184.00		
7+60	75 194.00		
7+70	75 204.00		
7+80	75 214.00		
7+90	75 224.00		
8+00	75 234.00		

9-1: TYPICAL SECTION A-A
SCALE 1"=40'



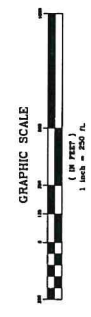
PHASE QUANTITIES

PHASE	AREA (ACRES)	VOLUME (MCY)	CUMULATIVE (MCY)
1	20.18	2.68	2.68
2	20.10	2.77	5.45
3	10.36	2.29	7.75
4	10.10	2.27	10.02
5	8.32	2.30	12.31
6	8.44	2.72	15.03
7	7.13	2.15	17.18
8	6.98	2.79	19.97
9	8.56	1.80	21.77
10	10.04	2.94	24.71
11	68.78	12.96	37.69

LEGEND

- PHASING BOUNDARY
- - - REC PLAN BOUNDARY
- ADJACENT PARCEL
- 10' FC CONTOURS
- - - LIMITS OF QUARRY
- (*) BENCH LIP

NO.	DATE	DESCRIPTION	BY



**AMENDMENT TO
RECLAMATION PLAN
NO. 07-002**

PLANS PREPARED UNDER THE SUPERVISION OF:

Shasta County
Crystal Creek Aggregate, Inc.

Phasing Plan

DATE	8/27/19	SHEET	4
DUANE K. MILLER CIVIL ENGINEER, INC. 412 MADISON WAY, SUITE 1 ASTORIA, OR 97103 DUANEMILLER.COM	SCALE	1" = 250'	OF
			6



PROJECT NUMBER: CRYSTAL CREEK QUARRY RECLAMATION 07-002

REVISIONS		
NO.	DATE	DESCRIPTION



- LEGEND**
- PROPERTY LINE
 - - - ADJACENT PARCEL
 - · - · - REC PLAN BOUNDARY
 - · - · - LIMITS OF QUARRY
 - · - · - BOUNDARY OF PLANTING BOUNDARY
 - · - · - HIGH WATER LINE
 - · - · - 10' FC CONTOUR
 - ▨ POND EDGE PLANTING (6.32 ACRES)
 - ▩ BENCH REVEGETATION (33.39 ACRES)
 - ⊠ REVEGETATION TEST PLOT

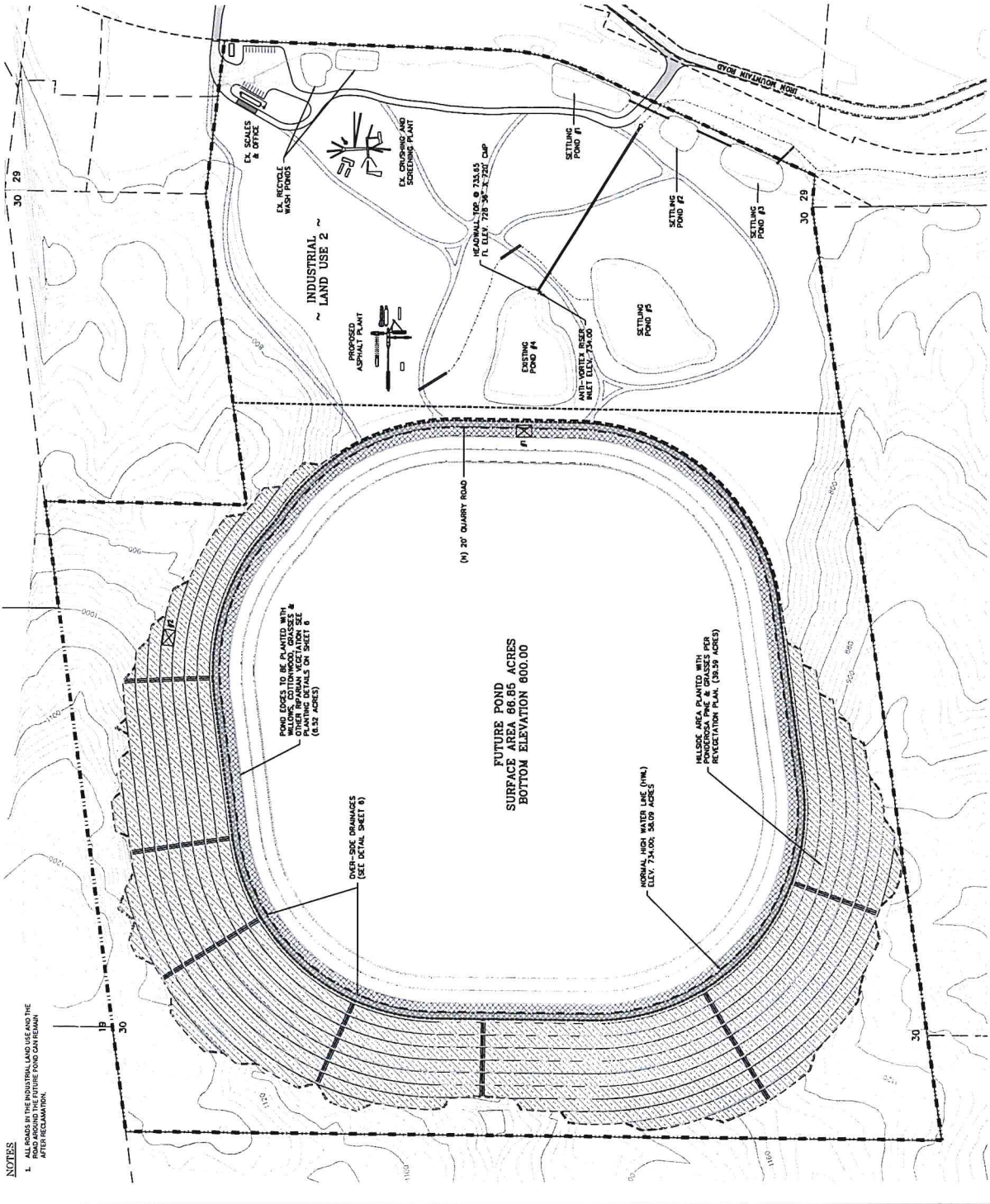


AMENDMENT TO
RECLAMATION PLAN
NO. 07-002

Shasta County Crystal Creek Aggregate, Inc.	
Reclamation Plan	
DATE	SHEET
8/27/19	5
SCALE	OF
1" = 150'	6



PLANS PREPARED UNDER
THE SUPERVISION OF:



NOTES

- ALL ROADS IN THE INDUSTRIAL LAND USE AND THE ROAD AROUND THE FUTURE POND CAN REMAIN AFTER RECLAMATION.

2021 Scoping

Appendix 5.5
2021 Initial Study and Notice of Preparation

REVISED NOTICE OF PREPARATION

TO: State Clearinghouse
State Responsible Agencies
State Trustee Agencies
Other Public Agencies
Interested Organizations
Members of the Public

FROM: County of Shasta
Shasta County Dept. of Resource Management,
Planning Division

CONTACT: Tara Petti, Associate Planner
1855 Placer Street, Suite 103
Redding, CA 96001
(530) 225-5532
tpetti@co.shasta.ca.us

SUBJECT: Revised Notice of Preparation of an Environmental Impact Report (EIR)

PROJECT TITLE: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

Shasta County is the Lead Agency under the California Environmental Quality Act (CEQA), and is preparing an Environmental Impact Report (EIR) for the project identified as Crystal Creek Aggregate Expansion Project, to amend the existing use permit and reclamation plan to construct and operate an asphalt plant, reconfigure the existing quarry to increase production, and expand the use permit area. The purpose of this Revised Notice of Preparation (NOP) is to solicit guidance from Responsible, Trustee, and other agencies (as well as input from members of the public) as to the scope and content of the EIR, including potential impacts of concern and mitigation measures or alternatives that should be considered. An NOP for this project was issued on September 30, 2019; due to significant changes to the proposal (including the elimination of the previously proposed general plan and zoning plan amendments), this Revised NOP is being issued.

Detailed project information, including an Initial Study prepared for the project, is currently available online at: <https://www.co.shasta.ca.us/index/drm/planning/eir/crystal-creek-aggregate>

If you do not have internet access or have trouble downloading project information from the internet address noted above, a hard copy may be obtained by calling or e-mailing the project CONTACT (listed above).

WRITTEN SCOPING COMMENTS: Written scoping comments will be accepted at any time during the 30-day scoping period. Due to the time limits mandated by state law, your response must be sent at the earliest possible date, but not later than the deadlines described below. Direct all questions and send all written comments to the project CONTACT (listed above).

PUBLIC SCOPING MEETING NOTICE: Shasta County will hold a public scoping meeting for agencies and individuals to learn more about the CEQA process for this project, and to receive comments regarding the appropriate scope and content of the EIR including what potential environmental impacts of the project should be addressed in depth in the EIR. The meeting will be held Tuesday, March 09, 2021 at 9:00am. Due to the COVID-19 public health emergency, the meeting will be held virtually, in order to help protect the health and safety of participants and staff.

Please join my meeting from your computer, tablet or smartphone.

<https://global.gotomeeting.com/join/806906845>

You can also dial in using your phone.

United States: [+1\(571\)317-3122](tel:+15713173122)

Access Code: 806-906-845

If you would like to receive e-mail notifications about the Crystal Creek Aggregate Expansion Project, please email tpetti@co.shasta.ca.us. The County will not sell your electronic contact information to anyone for any purpose. However, any information you provide may be subject to disclosure in response to a request for public information about the project.

The project description, location, and probable environmental impacts are noted in the Initial Study. The Initial Study preliminarily identifies the issues anticipated to be addressed briefly in the EIR (either because the resource is not present in the area or would not be affected by the project) and those impacts that the EIR will address in more detail. The EIR also may consider environmental issues that are raised by Responsible Agencies, Trustee Agencies, other interested agencies, and members of the public during the scoping process.

The EIR will consider all substantive environmental issues which are raised by responsible agencies, trustee agencies, other interested agencies, and members of the public or related groups during the NOP process, and will analyze these potential effects in detail and to the extent necessary to make a determination on the level of significance of such effects. Discussion of those environmental effects determined to result in no impact or a less-than-significant impact will be limited to a brief explanation in the EIR of why those effects are not considered potentially significant.

The following agencies may be a Trustee Agency and/or Responsible Agency for the proposed project or have other jurisdiction/interests concerning the proposed project.

United States Mine Safety and Health Administration (MSHA)
United States Bureau of Land Management (BLM)
California Department of Fish and Wildlife (DFW)
California Department of Forestry and Fire Protection (Cal Fire)
California Department of Transportation (Caltrans)
California Department of Toxic Substances Control (DTSC)
California Department of Resources and Recycling and Recovery (CalRecycle)
California Regional Water Quality Control Board (RWQCB)
California Division of Mine Reclamation (DMR)
California Division of Occupational Safety and Health (Cal OSHA)
Shasta County Resource Management Agencies (Air Quality, Environmental Health, Building, Fire)
Shasta County Department of Public Works (DPW)
Shasta County Sheriff's Department (Sheriff)

Whether your agency is or is not listed above we need to know the views of your agency or organization as to the scope and content of the environmental information germane to your agency's statutory responsibilities or of interest to your organization in connection with the proposed project. Specifically, we are requesting the following:

1. If you are a public agency, state if your agency will be a responsible or trustee agency for the project and list the permits or approvals from your agency that will be required for the project and its future actions;
2. Identify potential significant environmental effects and mitigation measures that you believe need to be explored in the EIR with supporting discussion of why you believe these effects may be significant;
3. Describe special studies and other information that you believe are necessary for the County to analyze the potential significant environmental effects, alternatives, and mitigation measures you have identified;
4. Provide the name, title, e-mail address, and telephone number of the contact person from your agency or organization that we can contact regarding your comments.

Due to the time limits mandated by State law, your response must be received by the County of Shasta by the following deadlines:


- **For responsible and trustee agencies, not later than 30 days after you receive this notice.**
- **For all other agencies, organizations, and individuals, not later than 30 days from publication of this Revised Notice of Preparation. The 30-day review period ends on Monday, March 22, 2021.**

If we do not receive a response from you/your agency or organization within the applicable time frame, we will presume that you/your agency or organization has no response to make.

A responsible agency, trustee agency, or other public agency may request a meeting with Shasta County or its representatives in accordance with Section 15082(c) of the CEQA Guidelines. Electronic copies of this Revised NOP are available by clicking on the Crystal Creek Aggregate Expansion Project link on the Shasta County Department of Resource Management homepage at:

<https://www.co.shasta.ca.us/index/drm/planning/eir/crystal-creek-aggregate>

Please provide your responses and any direct questions to the attention of Tara Petti, Associate Planner, via mail/delivery to Shasta County Department of Resource Management, Planning Division, 1855 Placer Street, Suite 103, Redding, CA 96001 or via e-mail to tpetti@co.shasta.ca.us. Phone (530) 225-5532.

Date: 2/17/21  Tara Petti, Associate Planner

ENVIRONMENTAL INITIAL STUDY

CRYSTAL CREEK AGGREGATE, INC.
Use Permit Amendment (UP-19-0007)
Reclamation Plan Amendment (RA-19-0001)
(State Clearinghouse No. 2019090702)

Applicant:
Crystal Creek Aggregate, Inc.

INITIAL STUDY CHECKLIST References and Documentation

Prepared by:
SHASTA COUNTY DEPARTMENT OF RESOURCE MANAGEMENT
PLANNING DIVISION
1855 Placer Street, Suite 103
Redding, California 96001

February 2021

**SHASTA COUNTY
ENVIRONMENTAL CHECKLIST FORM
INITIAL STUDY**

1. **Project Title:** Crystal Creek Aggregate, Inc. Use Permit Amendment (UP-19-0007); Reclamation Plan Amendment (RA-19-0001)
2. **Lead Agency Name and Address:**
Shasta County Department of Resource Management, Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001-1759
3. **Contact Person and Phone Number:**
Tara Petti, Associate Planner
(530) 225-5532
4. **Project Location:** The project site is an existing quarry located south of the community of Keswick, on the west side of Iron Mountain Road, approximately 1.0 miles north of the Intersection of Iron Mountain Road and State Route 299 West (SR-299) and directly across from the intersection of Iron Mountain Road and Laurie Ann Lane (10936 Iron Mountain Road) (refer to Figure 1, PROJECT LOCATION, and Figure 2, SITE VICINITY).
5. **Applicant Name and Address:**
Crystal Creek Aggregate, Inc.
Jerry Comingdeer, Owner/Operator
10936 Iron Mountain Road
Redding, CA 96001
6. **General Plan Designation:** Industrial (I) and Industrial – Interim Mineral Resource Overlay (I-IMR)
7. **Zoning:** General Industrial (I), Mineral Resources, and Industrial - Interim (I-IMR)
8. **Description of Project:** Crystal Creek Aggregate (CCA) (herein referred to as “project applicant”) proposes to expand their existing aggregate mining operation at their current location. CCA was originally permitted in 1990 under Shasta County Use Permit UP-24-90 and Reclamation Plan 1-90. Subsequently, in 2008 General Plan Amendment 07-005, Zone Amendment 07-020, Use Permit Amendment UP-07-020, and Reclamation Plan Amendment RP-07-022 were approved. A California Environmental Quality Act (CEQA) Mitigated Negative Declaration, with findings as specifically set forth in Planning Commission Resolution Nos. 2008-066 and 2008-067 were also adopted approving the various entitlements.

The project applicant proposes an overall project area of approximately 179.97 acres within which the existing approved Use Permit and Reclamation Plan Areas of 110.69 acres will be maintained but modified to increase the amount of aggregate to be mined. The use permit area is proposed to be expanded by an additional 69.28 acres referenced as the remaining Mineral Resource Area (MR) to serve to buffer lands to the south, west and north from noise, light and other mining related activities (refer to Figure 3, COMPREHENSIVE PROJECT PLAN OVERVIEW).

The total amount of aggregate to be processed yearly is proposed to increase from 250,000 to 500,000 tons and the total estimated amount proposed to be mined will increase from 15.92 million tons to 25.4 million tons over a period of three phases with an estimated life of the phases varying from 14 to 35 years. The estimated life of the mining operation will increase from the currently approved end of Year 2072 by 27 years to end of Year 2099. Also proposed is a portable propane powered drum mix asphalt plant. The plant could utilize up to 200,000 tons of the 500,000 tons of aggregate processed yearly for the production of asphalt.

No additional structures or operations other than those associated with the asphalt asphalt plant are proposed. The locations of the existing scales and office, rock crushing, screen and washing operational, primary and secondary entrances/exits, diesel fuel storage tanks, waste oil tank, two motor oil and one lubricating oil tank, and five settling and two recycle ponds will remain. The existing Concrete Recycle Area location and operation for which an administrative permit was issued and subsequently reissued by the County due to the Carr Fire is proposed as a project component. The location of the material and topsoil stockpiles will also remain in their current general location which will expand and contract as part of the mining operation. The number of full-time employees will increase from eight to 14 with one part-time employee. All existing and proposed uses are allowed under the existing General Plan Land Use Classifications and Zoning District Designations.

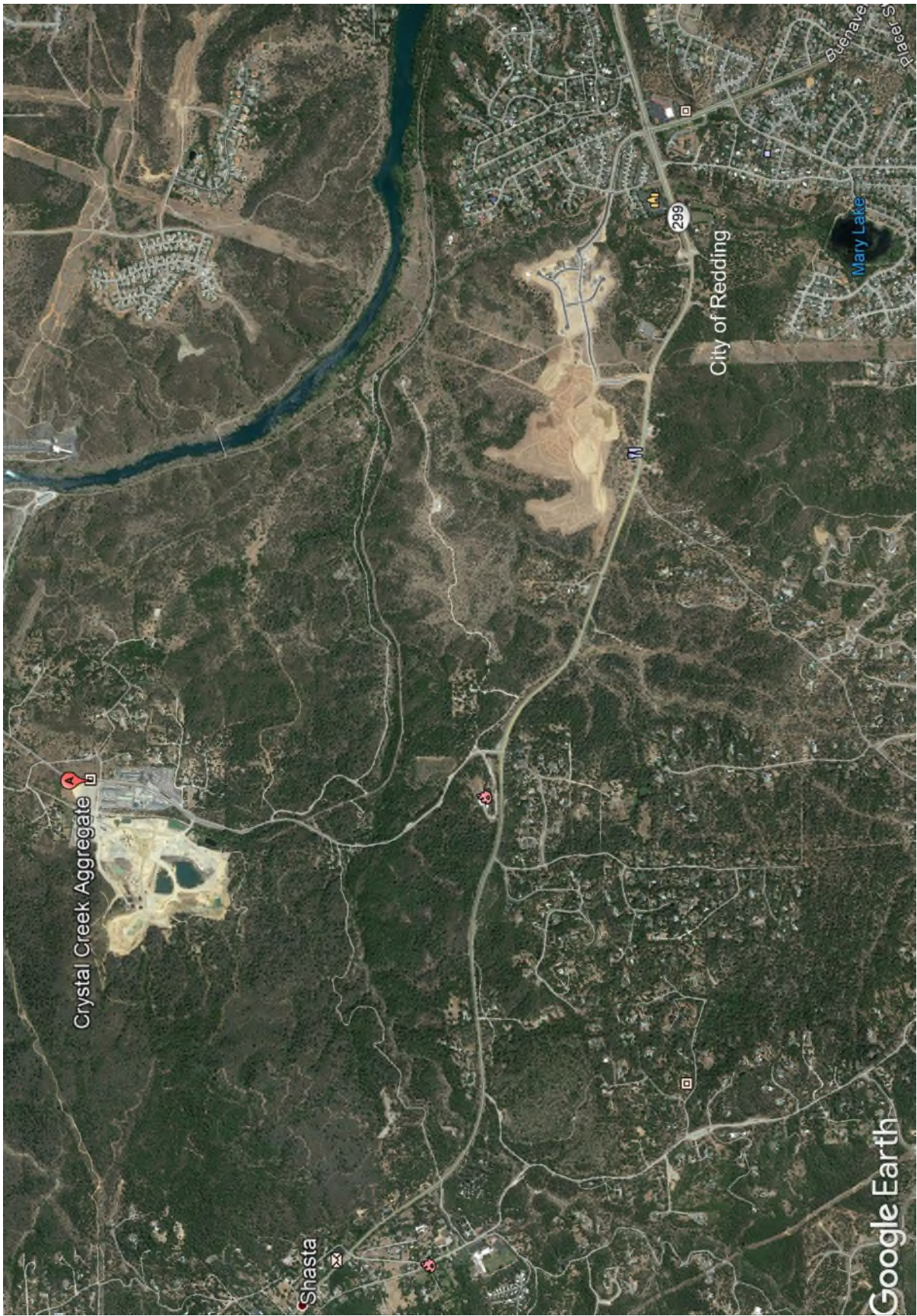


December 2, 2020

California & Shasta County Locations by rkBaron Geovisuals



FIGURE 1, PROJECT LOCATION



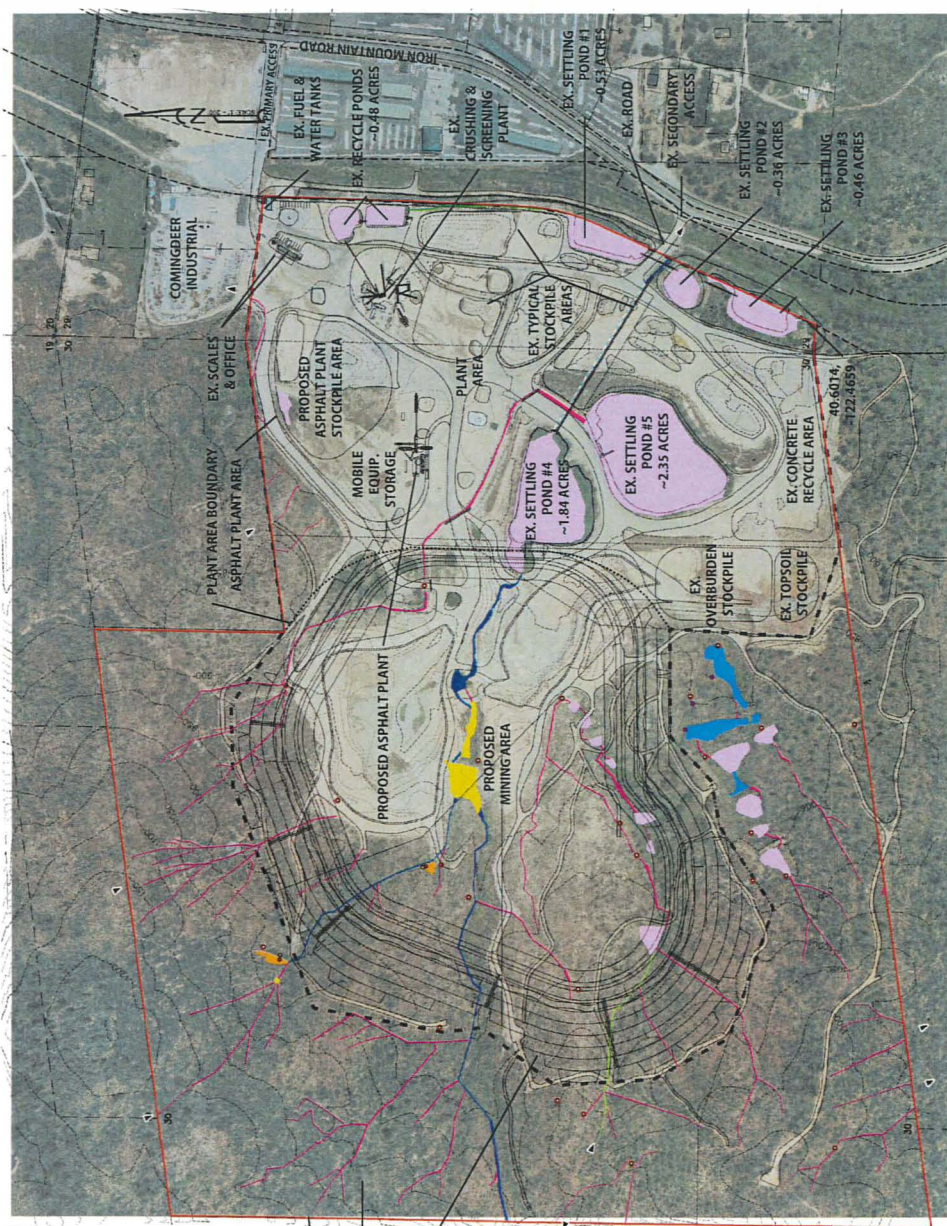
December 2, 2020

FIGURE 2 – SITE VICINITY

- Project Boundary - (179.97 acres)
- 25 Foot Contour
- Clavert
- Flow Direction
- Photo Points
- Data Points
 - Water
 - Test Pit
 - Wellhead
 - Other Wetlands - (0.509 acres)
- Wetland Features - (0.489 acres)
 - Wetland
 - Seasonal Wetland
 - Non-Jurisdictional by Rule - (9.943 acres)
- Other Wetlands - (0.509 acres)
 - Wetland
 - Seasonal Wetland
 - Non-Jurisdictional by Rule - (9.943 acres)
- Other Wetlands - (0.509 acres)
 - Wetland
 - Seasonal Wetland
 - Non-Jurisdictional by Rule - (9.943 acres)
- Other Wetlands - (0.509 acres)
 - Wetland
 - Seasonal Wetland
 - Non-Jurisdictional by Rule - (9.943 acres)

Consent to Release: NAD 1983 California State Plane 12 Foot
 Projection: NAD 1983 California State Plane 12 Foot
 Vertical Datum: NAVD 83
 Horizontal Datum: NAD 83
 Vertical Datum: NAVD 83
 Horizontal Datum: NAD 83

This map is intended to be used in conjunction with the project plan and other documents. It is not to be used as a legal document. The information shown on this map is for informational purposes only and does not constitute a warranty of any kind. The user assumes all responsibility for the use of this map.



0 100 200 400 600 800 Feet
 1 inch = 200 feet

Figure 3
 Crystal Creek Aggregate, Inc.
 10936 Iron Mountain Road
 Redding, CA 96001
 Duane K. Mear, Civil Engineer
 6172 Avenue Hwy, Unit 1
 Redding, CA 96001
 Phone: 530-243-5490
 Fax: 530-243-5491
 Date: 06-09-2020

Amending Use Permit UP-07-020 will modify the design of the existing mining area or quarry of approximately 57.31 acres and the plant area of approximately 53.38 acres which together total 110.69 acres that will be maintained as the Reclamation Plan Area with associated boundaries. However, the amount of aggregate mined, as noted, will be increased as will the hours of operation, particularly with respect to the asphalt plant (24 hours per day generally Sunday evenings through Friday afternoons), and yearly blasting maximums (24 instead of 12). The average height of the highwalls will increase from 22 feet to 40 feet, except for one highwall at 44 feet. Benches will also be increased in width from 30 feet to 40 feet, except for the bench along the perimeter of the pond which will be increased to 60 feet in width. The pond surface area will increase from 23.49 acres to 32.67 acres.

- 9. Surrounding Land Uses and Setting:** The existing quarry is located in an industrial area south of the community of Keswick. Surrounding land uses consist of industrial to the east, industrial to the north and low-density residential to the northeast and southeast, and undeveloped land to the south and west.

The topography of the existing quarry floor has been made relatively flat by the removal of the aggregate material over the years. The existing bowl shaped quarry face extends upslope and to the west from the quarry floor with horizontal benches having been or to be established as excavation proceeds to the extent of the existing quarry boundary. There is an approximate 200-foot change in elevation from the existing quarry floor to what would be the top of the quarry face based on the current mining plan.

The project site is located within the boundary of the 2018 Carr Fire. Prior to the area being impacted by the Carr Fire, the primary vegetation type present in unmined portions of the project site and vicinity was predominantly knob cone pine and chaparral with scattered oaks and ponderosa pine. In areas where the fire burned with lesser intensity, the composition of species remains as it existed prior to the fire. Currently, in unmined portions of the project site and vicinity where the fire burned with greater intensity, vegetation consists mostly of secondary successional vegetation.

- 10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):**

California Department of Fish and Wildlife (CDFW)
California Department of Forestry and Fire Protection (CAL FIRE)
California Department of Resources and Recycling and Recovery (CalRecycle)
California Department of Transportation (Caltrans)
California Department of Toxic Substances Control (DTSC)
California Division of Mine Reclamation (DMR)
California Division of Occupational Safety and Health (Cal OSHA)
California Regional Water Quality Control Board (RWQCB)
Shasta County Department of Public Works (DPW)
Shasta County Resource Management Agencies (Air Quality, Environmental Health, Building, Fire)
Shasta County Sheriff's Department (Sheriff)

- 11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

The County's AB 52 contact list consists of Native American tribes that had submitted written requests for notification of CEQA projects within their geographic area of traditional and cultural affiliation as of October 7, 2019, when the County initiated consultation. The County sent a letter by certified mail on October 7, 2019 to the Wintu Tribe of Northern California and Toyon-Wintu Center. Return receipts for the certified letters indicate the letters were delivered on October 7, 2019. The County received no response to the letter.

NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

X	Aesthetics		Agricultural and Forestry Resources	X	Air Quality
X	Biological Resources	X	Cultural Resources	X	Energy
	Geology & Soils	X	Greenhouse Gas Emissions	X	Hazards & Hazardous
X	Hydrology & Water Quality		Land Use & Planning		Mineral Resources
X	Noise		Population & Housing		Public Services
	Recreation	X	Transportation		Tribal Cultural Resources
X	Utilities & Service Systems	X	Wildfire	X	Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of the initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

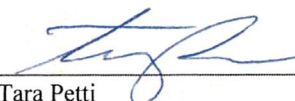
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.


I find that the proposed project MAY have a "potentially significant" impact or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Copies of the Initial Study and related materials and documentation may be obtained at the Planning Division of the Department of Resource Management, 1855 Placer Street, Suite 103, Redding, CA 96001. Contact Ms. Tara Petti, Associate Planner at (530) 225-5532.


 Tara Petti
 Associate Planner

2/17/21
 Date


 Paul A. Hellman
 Director of Resource Management

2/17/21
 Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parenthesis following each question. A “No Impact” answer is adequately supported if all the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less-than-significant with mitigation, or less-than-significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more, “Potentially Significant Impact” entries when the determination is made, an EIR is required.

“Negative Declaration: Less-than-significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less-than-significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from Section XVIII, “Earlier Analyses,” may be cross-referenced).

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

- a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures: For effects that are “Less-than-significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. General Plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
 - 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
 - 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
 - 9) The explanation of each issue should identify the following:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less-than-significant.

I. AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?			X	
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	X			

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

- a) Scenic vistas are defined as expansive views of highly-valued landscapes from publicly accessible viewpoints. Scenic vistas include views of natural features such as topography, water courses, outcrops, and natural vegetation, as well as man-made scenic structures. The proposed project is visible from sections of Iron Mountain Road, from residences and residential properties located in the community of Keswick, and from residential areas located to the south of State Route 299 (SR-299). Implementation of the proposed project would increase the approved height of the quarry highwalls and bench widths from 25 feet high and 25 feet wide to 40 feet high and wide, respectively. However, this increase would not exceed the approved vertical and horizontal limits allowed in the current use permit and reclamation plan. The bench tops would be planted with native trees and grasses as part of the proposed reclamation plan. Reclamation would occur in phases, but for periods of time and/or until reclamation vegetation is established some rock faces would be exposed. Impacts are considered less-than-significant in this regard.
- b) The County has not designated specific scenic vistas in the immediate project area as a part of the Shasta County General Plan and there is no designated State or federal scenic highways or scenic highway corridors in the vicinity of the proposed project. Therefore, the proposed project would not substantially damage any scenic resource. The project site is also not visible from a designated scenic highway. Impacts are considered less-than-significant in this regard.
- c) Land immediately adjoining the proposed project to the north, west, and some lands further south and east are under the jurisdiction of the Bureau of Land Management (BLM) and in the vicinity of several of Shasta County’s most popular mountain biking trails. These facilities are located generally to the north, south, and west of the project site and lands owned by the Comingdeer Trust on the adjacent BLM parcels and are associated with the Rock Creek – Middle Creek Trail System and other regional trail facilities that connect to the Sacramento River Rail – Trial System. Trailhead parking is provided at various locations along Iron Mountain Road between SR-299 and Keswick Dam Road. Iron Mountain Road is also popular with on-road bicyclists and many off-road bicyclists use the segment of Iron Mountain Road adjacent to the proposed project to connect to French Fry and Trail 58/Middle Creek.

The project would not degrade the existing visual character or quality of the site and its surroundings as no expansion of the existing quarry footprint is proposed. In addition, no additional structures or operations other than those associated with the asphalt plant are proposed. The proposed reclamation plan boundary does not extend the current permitted mine boundary. The locations of the existing scales and office, rock crushing, screen and washing operations, primary and secondary entrances/exits, diesel fuel storage tanks, waste oil tank, two motor oil and one lubricating oil tank, and five settling and two recycle ponds will remain. Impacts are considered less-than-significant in this regard.

- d) Light pollution occurs when nighttime views of the stars and sky are diminished by an over-abundance of light coming from the ground. Light pollution is a potential impact from the operation of any light source at night. Proper light shields, lighting design, and landscaping are commonly used to reduce light pollution generated from lighting by blocking the conveyance of light upwards. The result is that the lights are not visible from above; therefore, ambient light is not added to the nighttime sky. In addition, light reflecting off surfaces during daylight hours has the potential to create a source of glare in the vicinity of the proposed project.

Implementation of the proposed project which includes periodic nighttime asphalt plant operations would potentially create a new source of substantial light or glare which could result in night sky illumination and/or other adverse effects on nighttime views in and around the area. Further investigation and analysis will need to be conducted to assess the visibility of the proposed project and to assess the potential lighting impacts. Therefore, this potential impact will be fully analyzed in the EIR.

Findings: In the course of the above evaluation, impacts associated with *Aesthetics* were found to be potentially significant. Additional project and environmental data, further discussion and analysis of environmental impacts, recommendations for mitigations for potential impacts, and a mitigation monitoring plan, will be included in the EIR prepared for this proposed project.

II. AGRICULTURE AND FORESTRY RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determination can be made:

- a) The soils found on the project area belong to the Diamond Springs series. This series consists of well drained soils that are underlain by granitic or light-colored metavolcanic rocks. These soils are on uplands near Shasta, Keswick and Ingot. Slopes range from 8 to 50 percent with annual precipitation of between 40 and 50 inches.

The project site has not been historically used for agricultural purposes, nor does it possess soils that are prime for agricultural production. The site is not located within an area of Prime Farmland as identified by the California Department of Conservation’s Important Farmland Series Mapping and Monitoring Program. The subject property is not identified as Prime Farmland, Unique Farmland, or Statewide Importance on the map titled Shasta County Important Farmland 2016. Therefore, the proposed project would not convert prime farmland, unique farmland, or farmland of statewide importance to nonagricultural use and there would be no impact which means that this impact will not be evaluated in the EIR.

- b) The project area is not currently under a Williamson Act Contract nor is it zoned for agricultural use by Shasta County. Consequently, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act Contract. Therefore, there would be no impact from the proposed project and the impact will not be evaluated in the EIR.

- c) The project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). The project site is not forest land, timberland or zone Timberland Production. Therefore, the proposed project would not conflict with existing zoning or cause rezoning and would have no impact on timberlands zoned as Timber Production. As such, this impact will not be analyzed further in the EIR.
- d) The project would not result in the loss of forest land or conversion of forest land to non-forest use. The project site is not forest land. In addition the proposed project is not located in an area of significant agricultural soils. As such, this impact will not be analyzed further in the EIR.

Findings: In the course of the above evaluation, impacts associated with *Agriculture and Forestry Resources* were found to not be significant because of the inability of a project of this scope to create such impacts or the absence of project characteristics producing effects of this type. The effects determined not to be significant are not required to be included in primary analysis sections of the EIR. As such, impacts to *Agriculture and Forestry Resources* are not reasonably foreseeable and will not be addressed further in the EIR to be prepared for this project.

III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	X			
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?	X			
c) Expose sensitive receptors to substantial pollutant concentrations?	X			
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	X			

Discussion: Based on related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) The applicable air quality plan for the project area is the Northern Sacramento Valley Air Basin’s (NSVAB’s) 2018 Air Quality Attainment Plan (“Plan”). The Plan is primarily concerned with the pollutant ozone for which the NSVAB has been designated non-attainment. In particular, the Plan presents strategies necessary to attain the California ambient air quality standard for the 1-hour ozone standard at the earliest practicable date. Due to the scale of the proposed project, further analysis is required to determine the extent to which increases in nitrogen oxides (NO_x), reactive organic gases (ROG), and inhalable particulate matter (PM₁₀) generated from project construction and operational activities may conflict with or obstruct implementation of the Air Quality Attainment Plan as well as what, if any, mitigation measures should be incorporated to reduce the impacts to a level that is less-than-significant. Therefore, these impacts are considered to be potentially significant and will need to be addressed in an EIR.
- b-c) Primary air pollutant emissions associated with operation of the asphalt plant would include natural gas combustion associated with aggregate drying and asphalt cement heating (carbon monoxide [CO], nitrogen oxides [NO_x], sulfur dioxide [SO₂], particulate matter [PM₁₀/PM_{2.5}], reactive organic gases [ROG]), and dryer dust [PM₁₀/PM_{2.5}]). The project could potentially result in a cumulatively considerable net increase of criteria pollutants, including ozone, ozone pre-cursors or PM₁₀, the pollutants for which the Northern Sacramento Valley Air Basin is in non-attainment under the applicable State ambient air quality standard. Preliminary review merits further evaluation and possible mitigation. Therefore, these potential impacts will be fully analyzed and evaluated in the EIR.
- d) The project could potentially result in air emissions which would create objectionable odors affecting a substantial number of people. Operational air contaminants include diesel emissions from on- and off-road vehicles and equipment, and diesel and process emissions, including odors.

The type of asphalt plant proposed is a portable drum mix type that will be powered by propane gas, which produces significantly less nitrogen oxide (NO_x) emissions (approximately 76 percent less), sulfur dioxide (SO₂) emissions, and some hazardous air pollutants than an oil fired plant. This process is a continuous mixing type process whereby the dryer is used, not only to dry the material, but also to thoroughly mix the heated and dried aggregates with the liquid asphalt cement. After mixing, the heated asphalt is discharged at the end of the drum and conveyed to Hot Mix Asphalt (HMA) or Warm Mix Asphalt (WMA) silos where the asphalt is stored and loaded onto trucks for delivery to project sites. The primary odor-causing compound from asphalt and the aggregate processing facilities, hydrogen sulfide (H₂S), has the potential to cause localized odor impacts in the vicinity of the project site. Preliminary review merits further evaluation and possible mitigation. Therefore, these potential impacts will be fully analyzed and evaluated in the EIR.

Findings: In the course of the above evaluation, impacts associated with *Air Quality* were found to be potentially significant. Additional project and environmental data, further discussion and analysis of environmental impacts, recommendations for mitigations for potential impacts, and a mitigation monitoring plan, will be included in the EIR prepared for this proposed project.

IV. <u>BIOLOGICAL RESOURCES</u>: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	X			
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	X			
c) Have a substantial adverse effect on state or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	X			
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	X			
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community, Conservation Plan, or other approved local, regional, or State habitat conservation plan?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

a-d) On October 29, 2019, the California Department of Fish and Wildlife (CDFW) provided a response to Shasta County’s 2019 Notice of Preparation (NOP) for the previously considered onsite expansion of the quarry (GPA 19-0003, ZA 19-0002, UP 19-0007, RP 19-0001) (State Clearinghouse No. 2019090702). Comments and recommendations in the letter refer to the forthcoming EIR and the studies and data that will inform analysis of baseline conditions and potential impacts. Specific reference was made to special-status species and habitat surveys. Additional comments and recommendations, in general, referred to: additional special-status species and habitat surveys; evaluation of potential impacts to California Endangered Species Act (CESA) listed species (or plants or animals listed as endangered or threatened under CESA); rare plant and sensitive natural communities; and additional monitoring and studies related to wildlife and aquatic resources, among other issues.

A biological resources assessment will be prepared to address potential impacts to sensitive biological resources based on the applicable recommendations of CDFW’s October 29, 2019 letter and any further information provided by CDFW during this NOP process. The biological resources assessment and any further studies necessary to determine the project’s potential impacts on biological resources will be fully analyzed in the EIR.

- e) The proposed project would not conflict with any ordinances or policies which protect biological resources. Shasta County Board of Supervisors' Resolution No. 95-157 provides guidance regarding use and protection of oak trees on a voluntary basis. Implementation of the proposed project would not result in the removal of trees outside the currently permitted quarry area. No impacts would occur in this regard.
- f) There are currently no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or State habitat conservation plans for the project site or project area. There would not be any conflict with local policies or ordinances protecting biological resources, nor with any habitat conservation plans. No impacts would occur in this regard.

Findings: In the course of the above evaluation, impacts associated with *Biological Resources* were found to be potentially significant. Additional project and environmental data, further discussion and analysis of environmental impacts, recommendations for mitigations for potential impacts, and a mitigation monitoring plan, will be included in the EIR prepared for this proposed project.

V. CULTURAL RESOURCES: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	X			
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	X			
c) Disturb any human remains, including those interred outside of formal cemeteries?			X	

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

a-b) Based on the result of the Archaeological Inventory Survey (Land Designers, 2006) prepared for the previous 2008 General Plan Amendment 07-005, Zone Amendment 07-020, Use Permit Amendment, UP-07-020, and Reclamation Plan Amendment RP-07-022, no previously unidentified sites or features dating to historic time periods were observed during the survey. These negative results are explained primarily by the extensive disturbance to which all of the project area has been subjected. Two previously identified historic sites had been recorded within the project area. Both of these sites were evaluated for significance per CEQA and eligibility per the National Register of Historic Places, with Jensen concluding (2002), and the United States Bureau of Land Management (BLM) and California State Historic Preservation Office (SHPO) concurring, that neither one is eligible for inclusion on the National Register or significant per CEQA, due to lack of integrity dating to the period of potential significance of these sites. As a consequence of this recommendation and concurrence by BLM and California SHPO, no treatment or mitigative action was recommended.

The same conclusion is relevant for the twelve previously identified Isolates in the 2006 Archaeological Inventory Survey. Isolates are themselves categorically excluded as significant or potentially significant per CEQA or eligible for inclusion on the National Register of Historic Places. Again, no treatment or mitigative action was recommended in relation to potential impacts to these twelve Isolates might accompany the 2002 proposed land exchange, or any future development or impacts to which the property might be subject, such as the present licensing and reclamation plan.

The proposed project would result in a significant impact if it caused a substantial adverse change in the significance of an archaeological resource. Based on the results of the investigations described above, there are no resources in the Project Area with intact visible surface manifestations that qualify as *archaeological resources* or *historical resources* as defined by CEQA Guidelines Section 15064.5. However, there is the possibility of encountering buried archaeological resources during project activities, including ground disturbing activities onsite and at off-site intersection improvements. Additional evaluation in the EIR is required.

c) There are no known burial sites on the proposed project site. If human remains are unearthed during future development of the site, the provisions of California Health and Safety Code Section 7050.5 shall apply. Under this Section, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition, pursuant to California Public Resources Code Section 5097.98.

Findings: In the course of the above evaluation, impacts associated with *Cultural Resources* were found to be potentially significant. Additional project and environmental data, further discussion and analysis of environmental impacts, recommendations for mitigations for potential impacts, and a mitigation monitoring plan, will be included in the EIR prepared for this proposed project.

<u>VI. ENERGY:</u> Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	X			
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

- a) No new buildings or structures requiring electric power service or additional energy consumption are proposed with the exception of lighting for the asphalt plant. Further evaluation of potential impacts to energy resources related to the increased hours of operation, including the proposed asphalt plant will be addressed in the EIR.
- b) The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The project has no effect on the County’s efforts to develop renewable energy sources for County facilities when practical. Less-than-significant impacts would occur in this regard.

Findings: In the course of the above evaluation, impacts associated with *Energy* were found to be potentially significant. Additional project and environmental data, further discussion and analysis of environmental impacts, recommendations for mitigations for potential impacts, and a mitigation monitoring plan, will be included in the EIR prepared for this proposed project.

<u>VII. GEOLOGY AND SOILS:</u> Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i) Rupture of a known earthquake, fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publications 42. ii) Strong seismic ground shaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides? 			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?				X

<u>VII. GEOLOGY AND SOILS:</u> Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

a) The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault

The California Geologic Survey (CGS) evaluates the activity rating of a fault in fault evaluation reports (FERs). FERs compile available geologic and seismologic data and evaluate if a fault should be zoned as Holocene-active, pre-Holocene, or age undetermined. If an FER evaluates a fault as Holocene-active, then it is typically incorporated into a Special Studies Zone in accordance with the Alquist-Priolo Earthquake Fault Zoning Act (AP). AP Special Studies Zones require site-specific evaluation of fault location for structures for human occupancy and require a habitable structure setback if the fault is found traversing a project site. The proposed project is not located within an Alquist-Priolo Earthquake Fault Zone established by the State. Because of this, the likelihood of faulting occurring across the quarry site is low.

A number of regional faults are present in the project area. The closest mapped faults to the site are the pre-Holocene Hoadley and Spring Creek faults, both located within a few miles of the site. The closest mapped Holocene-active fault is the Hat Creek-McArthur fault zone, located about 39 miles east of the site. Based on this existing information, there will be less-than-significant impacts related to surface fault rupture.

ii) Strong seismic ground shaking

Although there are no known earthquake faults in the project vicinity, the entire northern California region is subject to the potential for moderate to strong seismic shaking due to distant seismic sources. Seismic shaking can be generated on faults many miles from the project vicinity. Renewed activity at Mt. Shasta or Mt. Lassen, would presumably be associated with seismicity and potential strong ground shaking. Seismic shaking potential is, therefore, a regional hazard; the hazard is not higher or lower at the project site than throughout the region. Standard design and construction practices meeting current California Building Codes (where applicable) will provide adequate protection for the proposed project. The implementation of these standard building practices will result in less-than-significant impacts related seismic ground shaking in the area.

iii) Seismic-related ground failure, including liquefaction

Seismic ground settlement is not considered a hazard at the site due to the fact that the site is underlain by solid granitic rock and is not subject to seismic ground failure. No impacts are anticipated in this regard.

iv) Landslides.

Landslides occur throughout Shasta County, although they have not been considered a major problem. Landslides are more prevalent in the eastern and northern portions of the county and are commonly related to the sedimentary and volcanic rocks in these vicinities. Based on the project's Geotechnical Report, the change in horizontal and vertical bench proposed has been evaluated and indicate that the proposed walls and benches as designed would remain stable. Less-than-significant impacts would occur in this regard.

b) The soils found on the project area belong to the Diamond Springs series. This series consists of well drained soils that are underlain by granitic or light-colored metavolcanic rocks. These soils are on uplands near Shasta, Keswick and Ingot. Slopes range from 8 to 50 percent with annual precipitation of between 40 and 50 inches.

As discussed in greater detail below under Item X.a, the proposed project will continue to comply with the statewide Construction General Permit (Order No. 2009-0009-DWQ) and the Industrial Storm Water General Permit (Order No. 2014-0057-DWQ). The proposed project would be subject to the requirements of Shasta County Code Chapter 12.12 related to grading. Compliance with the statewide Construction General Permit and Shasta County Code Chapter 12.12 of would serve to ensure that short-term surface water quality impacts are minimized. Impacts would be less-than-significant in this regard.

- c) The threat of landslides, lateral spreading, subsidence, liquefaction, or collapse is insignificant as the geology of the area demonstrates stability. As noted above, based on the project Geotechnical Report, the change in horizontal and vertical bench proposed has been evaluated and indicate that the proposed walls and benches as designed would remain stable. Less-than-significant impacts would occur in this regard.
- d) Shasta County is characterized by moderate to low expansiveness in soils with small scattered areas of high expansiveness. The proposed project is not located on expansive soils. No impact would occur in this regard.
- e) The proposed project does not propose any wastewater facilities or the development of any additional onsite septic systems, therefore will be no impact.
- f) The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Findings: In the course of the above evaluation, impacts associated with *Geology and Soils* were found to not be significant because of the inability of a project of this scope to create such impacts or the absence of project characteristics producing effects of this type. The effects determined not to be significant are not required to be included in primary analysis sections of the EIR. As such, impacts to *Geology and Soils* are not reasonably foreseeable and will not be addressed further in the EIR to be prepared for this project.

VIII. GREENHOUSE GAS EMISSIONS: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	X			
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	X			

Discussion: Based on these comments, the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

- a) Impacts associated with greenhouse gas emissions are more appropriately evaluated on a regional level than at a project scale as greenhouse gas impacts on the atmosphere are generally independent of the point of emission. The internal combustion of fuels to power heavy equipment for construction as well as vehicles trips associated with the proposed project construction and operation will generate greenhouse gases. However, construction and operation-related emissions would occur at a low enough level that they are expected to have a negligible effect to climate change.

Proposed project emissions will need to be modeled to determine if the proposed project would generate greenhouse gas emissions, either directly or indirectly that might have a significant impact on the environment. This is considered a potentially significant impact and will be further addressed in the EIR.

- b) The project could conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Shasta County has drafted a Regional Climate Action Plan; however, this plan has not been adopted. Further evaluation in the EIR is required.

Findings: In the course of the above evaluation, impacts associated with *Greenhouse Gas Emissions* were found to be potentially significant. Additional project and environmental data, further discussion and analysis of environmental impacts, recommendations for mitigations for potential impacts, and a mitigation monitoring plan, will be included in the EIR prepared for this proposed project.

IX. HAZARDS AND HAZARDOUS MATERIALS: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	

IX. HAZARDS AND HAZARDOUS MATERIALS: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	X			
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	X			

Discussion: Based on these comments, the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

- a) Hazards are those physical safety factors that can cause injury or death, and while by themselves in isolation may not pose a significant safety hazard to the public, when combined with development of projects can exacerbate hazardous conditions. Hazardous materials are typically chemicals or processes that are used or generated by a project that could pose harm to people, working at the site or on adjacent areas. Many of these chemicals can cause hazardous conditions to occur should they be improperly disposed of or accidentally spilled as part of project development or operations. Hazardous materials are also those listed as hazardous pursuant to Government Code Section 65962.5.

The Shasta County Environmental Health Division (EHD) is the administering agency and the Certified Unified Program Agency (CUPA) for Shasta County with responsibility for regulating hazardous materials handlers, hazardous waste generators, underground storage tank facilities, above ground storage tanks, and stationary sources handling regulated substances. A Hazardous Materials Business Plan (HMBP) is required of businesses in Shasta County that handle, use, generate, or store hazardous materials. The primary purpose of this plan is to provide readily available information regarding the location, type and health risks of hazardous materials to emergency response personnel, authorized government officials, and the public. Large cases of hazardous materials contamination or violations are referred to the Central Valley Regional Water Quality Control Board (RWQCB) and the California Department of Toxic Substances Control (DTSC).

The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The existing quarry and aggregate processing operation uses small amounts of fuel and lubricants and is subject to the County's HMBP program, which is regulated by the Shasta County EHD as part of the Certified Unified Program (CUPA). The program requires the preparation of a document that provides an inventory of hazardous materials onsite, emergency plans and procedures in the event of an accidental release, and training for employees on safety procedures for handling hazardous materials and in the event of a release or threatened release. These plans are routine documents that are intended to disclose the presence of hazardous materials and provide information on what to do if materials are inadvertently released.

There is a business plan on file with the Shasta County EHD which conducts periodic site inspections. Blasting of quarry rock has historically occurred onsite and the frequency of blasting will slightly increase with implementation of the proposed project. Explosive and detonators are not stored onsite and are only onsite when a blast is being set up. Less-than-significant impacts are anticipated in this regard.

- b) The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials used during onsite currently and the generally low level of hazardous materials utilized for asphalt plant operations. Onsite operations would be required to continue to use standard operational controls and safety procedures that would avoid and minimize the potential for accidental release of such substances into the environment. Standard practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and federal law. Implementation of the proposed project would result in less-than-significant impacts in this regard.

- c) The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The proposed project is not located within one-quarter mile of an existing or proposed school. No impacts would occur in this regard.
- d) The project is not located on a site which is included on a list of hazardous materials sites and would not create a significant hazard to the public or the environment. The project site is not included on the list of hazardous materials sites compiled by the California Department of Toxic Substances Control. No impacts would occur in this regard.
- e) The project is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport to the project site is the Benton Airport located approximately 3.5 miles to the southeast. No impacts would occur in this regard.
- f) The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Currently, the County has not adopted comprehensive emergency evacuation plan applicable to this area. In addition, neither Iron Mountain Road nor Keswick Dam Road is identified as a designated evacuation route by the County. However, Iron Mountain Road provides the primary access from State Route 299 (SR-299) for residents and emergency crews to the area, including the community of Keswick. Keswick Dam Road intersects with Iron Mountain Road approximately 0.5 miles north of the site and provides important emergency ingress and egress (WSRCD 2016). The potential for the proposed project to impact emergency response will be evaluated in the EIR.
- g) The outbreak and spread of wildland fires within the project area is a potential danger, particularly during the hot, dry summer and fall months. Various factors contribute to the intensity and spread of wildland fires: humidity, wind speed and direction, vegetation type, the amount of vegetation (fuel), and topography. The topography, climate, and vegetation of much of the area are conducive to the spread of wildland fires once started.

The most significant fire incident to impact the western Shasta County, including the project site and adjacent community, was the 2018 Carr Fire. The Carr Fire began July 23, 2018 at approximately 1:15 p.m. from a suspected vehicle mechanical failure. The fire origin was within Whiskeytown National Recreation Area (NRA), and spread to lands administered by the Bureau of Land Management (BLM) and United States Forest Service (USFS) in subsequent days.

On the morning of Thursday, July 26, 2018 the California Department of Forestry and Fire Protection (CAL FIRE) moved onto the existing quarry site with approximately four bulldozers, four helicopters, 60 to 100 different fire engines and water tenders. Onsite ponds (pond No. 4 and No. 5) provided water resources to fire suppression helicopters, water tenders, and fire engines. However, they left due to the fire tornado that began that night and continued into the following morning. On Sunday, July 29, 2018, Pacific Gas & Electric Company (PG&E) and their contractor, Outback Contractors, Inc. mobilized onsite and utilized the entire site essentially as a command center. Over 500 pieces of major equipment, including but not limited to; trailers, backhoes, gravel trucks, four to five helicopters, trucks, and associated personnel, occupied the site.

According to the *Carr Incident Damage Inspection Report* (DINS) prepared by CAL FIRE, 819 residential structures were destroyed in unincorporated Shasta County (CAL FIRE 2018). This includes most of the residential structures within and surrounding the community of Keswick. At the time of the fire the community of Keswick had an estimated population of 327 residents (WSRCD 2016). As of November 2019, single-family residential building permit activity within the unincorporated portions of Shasta County impacted by the Carr Fire include the following: four permits ready to issue, 110 permits issued, 28 permit applications applied and under review, four permits cancelled or voided, and 31 permits finalized (Shasta County 2019).

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas of significant fire hazards in the state through its Fire and Resources Assessment Program (FRAP). These maps place areas of the state into different fire hazard severity zones (FHSZ) based on a hazard scoring system using subjective criteria for fuels, fire history, terrain influences, housing density, and occurrence of severe fire weather where urban conflagration could result in catastrophic losses. As part of this mapping system, land where CAL FIRE is responsible for wildland fire protection and generally located in unincorporated areas is classified as a State Responsibility Area (SRA). Where local fire protection agencies, such as the Shasta County Fire Department, are responsible for wildfire protection, the land is classified as a Local Responsibility Area (LRA). CAL FIRE currently identifies the project site as an SRA. In addition to establishing local or state responsibility for wildfire protection in a specific area, CAL FIRE designates areas as very high fire hazard severity zones (VHFHSZ) or non-VHFHSZ. The project site is designated as VHFHSZ by CAL FIRE.

Permitted mine activities occur immediately adjacent to undeveloped lands managed by the Bureau of Land Management (BLM) and continually encroach into onsite permitted open space to access economically viable mineral deposits. As noted above, the project site and areas surrounding it have been designated as a VHFHSZ by CAL FIRE and are susceptible to wildfires. Existing houses and structures east the project area, including new residential structures being built in and around the Keswick community,

continue to be susceptible to wildland fires. The potential for wildland hazards to be exacerbated as a result of the proposed project will be evaluated in the EIR.

Findings: In the course of the above evaluation, impacts associated with *Hazards and Hazardous Materials* were found to be potentially significant. Additional project and environmental data, further discussion and analysis of environmental impacts, recommendations for mitigations for potential impacts, and a mitigation monitoring plan, will be included in the EIR prepared for this proposed project.

X. <u>HYDROLOGY AND WATER QUALITY:</u> Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	X			
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	X			
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable management plan?			X	

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

- a) The State Water Resources Control Board (SWRCB) is responsible for implementing the Clean Water Act and has adopted four statewide general permits in order to efficiently regulate different types of stormwater discharges under a single permit. Two of those general permits are relevant to this project: general permits for stormwater runoff from industrial and construction sites.

The SWRCB has issued a statewide General Permit (Water Quality Order 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-006-DWQ) for construction activities within the State. The State General Construction Activity Storm Water Permit (CGP) is implemented and enforced by the Regional Water Quality Control Boards (RWQCBs). The CGP applies to construction activity that disturbs one acre or more, and requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) that identifies Best Management Practices (BMPs) to minimize pollutants from discharging from the construction site to the maximum extent practicable. The BMPs, that must be implemented, can be categorized into two major categories: 1) erosion and sediment control BMPs, and 2) non-storm water management and materials management BMPs. Erosion and sediment control BMPs fall into four main subcategories:

- Erosion controls
- Sediment controls
- Wind Erosion controls
- Tracking controls

Erosion controls include practices to stabilize soil, in order to protect the soil in its existing location and prevent soil particles from migration. Examples of erosion control BMPs are: preserving existing vegetation, mulching and hydroseeding. Sediment controls are practices to collect soil particles after they have migrated, but before the sediment leaves the site. Examples of sediment control BMPs are: street sweeping, fiber rolls, silt fencing, gravel bags, sand bags, storm drain inlet protection, sediment traps and detention basins. Wind erosion controls prevent soil particles from leaving the site in the air. Examples of wind erosion control BMPs include: applying water or other dust suppressants to exposed soils on the site. Tracking controls prevent sediment from being tracked off site via vehicles leaving the site to the extent practicable.

A stabilized construction entrance not only limits the access points to the construction site, but also functions to partially remove sediment from vehicles prior to leaving the site. Non-storm water management and material management controls reduce non-sediment related pollutants from potentially leaving the construction site to the extent practicable. The CGP prohibits the discharge of materials other than storm water and authorized non-storm water discharges (such as irrigation and pipe flushing and testing). Non-storm water BMPs tend to be management practices with the purpose of preventing storm water from coming into contact with potential pollutants. Examples of non-storm water BMPs include: preventing illicit discharges and implementing good practices for vehicle and equipment maintenance, cleaning and fueling operations, such as using drip pans under vehicles. Waste and materials management BMPs include implementing practices and procedures to prevent pollution from materials used on construction sites. Examples of materials management BMPs include:

- Good housekeeping activities, such as covering stored materials and elevating them off the ground, in a central location.
- Securely locating portable toilets away from the storm drainage system and performing routine maintenance.
- Providing a central location for concrete wash out and performing routine maintenance.
- Providing several dumpsters and trash cans throughout the construction site for litter/floatable management.
- Covering and/or containing stockpiled materials and overall good housekeeping on the site.

Industrial Storm Water General Permit Order 2014-0057-DWQ, as amended by Order 2015-0122-DWQ (General Industrial Permit) is an NPDES permit that regulates discharges associated with 10 broad categories of industrial activities, including mining activities like the proposed project. The General Industrial Permit requires the implementation of management measures that will achieve the performance standard of best available technology economically achievable (BAT) and best conventional pollutant control technology (BCT). Like the General Construction Permit, the General Industrial Permit also requires the development of a Storm Water Pollution Prevention Plan (SWPPP) and a monitoring plan. Through the SWPPP, sources of pollutants are to be identified and the means to manage the sources to reduce storm water pollution are described. The General Industrial Permit requires that an annual report be submitted each July 1.

The proposed project shall comply with the statewide Construction General Permit (Order No. 2009-0009-DWQ) and the Industrial Storm Water General Permit (Order No. 2014-0057-DWQ). The proposed project would be subject to the requirements of Shasta County Code Chapter 12.12 related to grading. Compliance with the statewide Construction General Permit and Shasta County Code Chapter 12.12 of would serve to ensure that surface water quality impacts are minimized.

On October 29, 2019, the Central Valley Regional Water Quality Control Board (CVRWQCB) provided a response to Shasta County's 2019 Notice of Preparation (NOP) for the previously considered onsite expansion of the quarry (GPA 19-0003, ZA 19-0002, UP 19-0007, RP 19-0001) (State Clearinghouse No. 2019090702). Comments and recommendations in the letter refer to the forthcoming EIR and the studies and data that will inform analysis of baseline conditions and potential impacts. Specific reference was made to surface water and groundwater quality. Additional comments and recommendations, in general, referred to: mine pit water quality; perpetual management of mine pit lake water level; cyanobacterial blooms; impacts to hydrogeology; wastewater treatment and disposal, among other issues.

A hydrology assessment will be prepared to address potential impacts to surface water and groundwater resources based on the applicable recommendations of CVRWQCB's October 29, 2019 letter and any further information provided by CVRWQCB during this NOP process. The hydrology assessment and any further studies necessary to determine the project's potential impacts on surface water and groundwater resources will be fully analyzed in the EIR.

- b) Approximately 960,000 gallons of water per year will be needed if all the aggregate used to produce 200,000 tons of asphalt is washed, which is equivalent to 4.8 gallons per ton. Water will be obtained from the two recycle ponds east of the wash plant that receive the used wash water which is then recycled. It is unlikely the proposed project will substantially deplete groundwater supplies or interfere substantially with groundwater recharge. No onsite wells are used for the project. Potable water service is provided by the Shasta Community Services District. Water for fire protection is provided by the onsite reservoirs which are supplied by surface and groundwater seepage. After mining is completed, reclamation would re-establish the natural surface drainage patterns in the area. The flat quarry floors, however, would enhance recharge locally. As a result, the proposed project is not anticipated to substantially deplete decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

As noted above under Item X.a, the CVRWQCB previously recommended additional evaluation and analysis of the project's potential impact to groundwater resources. The hydrology assessment and any further studies necessary to determine the project's potential impact to groundwater resources will be fully analyzed in the EIR.

- c) Implementation of the proposed project would not substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on-or offsite. The ultimate excavation of the quarry areas and associated water quality and drainage impacts was previously analyzed and approved through General Plan Amendment 07-005, Zone

Amendment 07-020, Use Permit Amendment, UP-07-020, and Reclamation Plan Amendment RP-07-022 (2008). No expansion in the quarry footprint would occur with the proposed project. Implementation of the proposed project would result in the addition of an onsite asphalt plant and expanded hours of onsite operation. As a result, the proposed project would result in less-than-significant impacts in this regard.

- d) The threat of a tsunami wave is not applicable to inland areas; there is no potential for the generation of a seiche. However, the uncontrolled releases from Shasta Dam, although very unlikely, would devastate the entire northern Central Valley including the proposed project. The Sacramento River and its tributaries would overtop banks and levees. Massive flooding in the lowlands along the river would occur and Interstate 5, the main west coast transportation artery, would be affected by closure and possible structural damage. As a result, the proposed project site would be directly affected by a dam overflow or failure. Although these are two different types of events, the results are the same - uncontrolled releases from Shasta Dam.

Dam Overflow

Although it is highly unlikely, a dam overflow is more likely than a dam failure. A dam overflow would be characterized by an “overtopping” of the dam. The design of the structure includes three large spillway gates to minimize the possibility of a true overtopping of the dam. During an intense and prolonged storm period that might bring water levels near the top of the dam, these spillway gates would be lowered allowing water to be discharged down the spillway. Controlling, or funneling, the discharge down the spillway prevents structural erosion along the base and sides of the dam, protects the turbine power generation plant at the base of the dam, and allows control of the release in cubic feet per second. Shasta Dam has never overflowed in its 60 year history.

Dam Failure

A dam failure is less likely than a dam overflow. A dam failure would be characterized by a structural breach of the dam. Flooding and overtopping, earthquakes, release blockages, landslides, lack of maintenance, improper operation, poor construction, vandalism, or terrorism typify dam failures. California has had about 45 failures of nonfederal dams. These failures occurred for a variety of reasons, the most common being overtopping of earthen dams. Some of the other reasons include specific shortcomings in the dams themselves or inadequate assessment of the surrounding geomorphologic characteristics. Shasta Dam is a federal dam, one of the largest concrete dams in the world, and secured firmly on bedrock.

Although there is a history of 45 dam failures within the State of California, most of the failures were earthen dams. Of the concrete dams that failed, all were of the “thin-arch” design. Shasta Dam is a federally controlled and inspected dam and is considered a “thick arch.” Seismic activity is monitored, and tunnels throughout the dam itself allow inspectors to monitor for cracks and seepage. The dam is built on bedrock and is geomorphologically sound. The probability of a dam failure is extremely low.

The proposed project, like many developed areas along the Sacramento River, is located within the mapped inundation area of Shasta Dam. As noted above, Shasta Dam has never overtopped and the probability of dam failure is considered extremely low. In addition, the County maintains an Emergency Operations Center (EOC), including communication and coordination with USBR, to help coordinate information and resources should the County experience a large event such as dam overflow or failure.

The number of full-time onsite employees will increase from eight to 14 with one part-time employee. While the proposed project would result in up to an additional seven people working at the proposed project site, the loss of life as a result of a catastrophic failure or overtopping of Shasta Dam is not considered significant given the dam type, construction, the historical context of dam operations and management, and ongoing coordination between the County and the United States Bureau of Reclamation (USBR). Impacts are therefore considered less-than-significant in this regard.

- e) Refer to response under Item X.b, above. The project would not conflict with or obstruct implementation of a water quality control plan or sustainable management plan. Impacts would be less-than-significant.

Findings: In the course of the above evaluation, impacts associated with *Hydrology and Water Quality* were found to be potentially significant. Additional project and environmental data, further discussion and analysis of environmental impacts, recommendations for mitigations for potential impacts, and a mitigation monitoring plan, will be included in the EIR prepared for this proposed project.

XI. LAND USE AND PLANNING: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) The existing quarry is located on the southwestern edge of the community of Keswick, on the east side of the ridge that divides the communities of Keswick and Shasta. The proposed project does not include the creation of any road, ditch, wall, or other feature which would physically divide an established community. No impacts would occur in this regard.
- b) The project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The existing General Plan Land Use Classification and Zoning District Designation of the Project Area is Industrial (I), Industrial - Interim Mineral Resource overlay (I-IMR) and Mineral Resource (MR). The existing plant facilities including the office, crushing, screening and washing facilities are all located in the Manufacturing – Interim Mineral Resource overlay (M-IMR) as required by the Shasta County Zoning Code. The Mining Area and the existing Topsoil Stockpiles are located in areas classified and designated as Mineral Resource (MR).

The existing General Plan Land Use Classification and Zoning District Designation of the project area is supported by the 1997 Mineral Land Classification for Shasta County by the State of California Department of Conservation that classified the existing operation and adjacent lands to the west and south as Mineral Resource Zone Category MRZ-2 “wherein lands classified as MRZ-2 are areas that contain identified mineral resources.” North of the Mining Area is the 10-acre APN 065-250-019 classified and designated Mineral Resource (MR). To the south of the existing Mining Area are 28.46-acres and to the south of that area is the remaining 81.72 acres of APN 065-250-026. These last two parcels are classified as Natural Resource Protection – Open Space (N-O) and zoned Unclassified (U). The proposed project requests the following actions from the County which involves an overall project area of 110.69-acres:

- Use Permit UP 19-0007 Amendment to modify the design of the existing mining Area of approximately 57.31-acres as identified in the Reclamation Plan Amendment, and the Plant Area of approximately 53.38-acres which together total 110.69-acres that will be maintained as the Reclamation Plan Area. Also sought is the approval for the installation and operation of an asphalt plant and for a permanent Concrete Recycle Area.
- Reclamation Plan RP 19-0001 Amendment will maintain the existing 110.69-acre Reclamation Plan Area and associated boundaries. However, the amount of aggregate mined will be increased as will the hours of operation, and yearly blasting maximums. The height of the quarry highwalls and bench widths will be increased as will the pond size and depth upon reclamation of the site. The estimated amount of aggregate proposed to be mined increases from 15.92 million tons to 25.4 million tons. The estimated life of the mining operation will increase from the end of Year 2072 by 27 years to end of the Year 2099.

Existing Land Use Classifications and Zoning District Designations provide for land use compatibility with the proposed CCA Use Permit and Reclamation Plan Amendments and overall operations. Furthermore, the compatibility preserves and protects a mineral resource of regional and local importance to meet the future needs of the North State and in particular Shasta County. In addition, the project is consistent with the policies of the General Plan, in particular with Objectives MR-1, MR-5, and MR-7, and Policy MR-a. All existing and proposed uses are allowed under the existing General Plan Land Use Classifications and Zoning District Designations. As a result, impacts would be less-than-significant in this regard.

Findings: In the course of the above evaluation, impacts associated with *Land Use and Planning* were found to not be significant because of the inability of a project of this scope to create such impacts or the absence of project characteristics producing effects of this type. The effects determined not to be significant are not required to be included in primary analysis sections of the EIR. As such, impacts to *Land Use and Planning* are not reasonably foreseeable and will not be addressed further in the EIR to be prepared for this project.

<u>XII. MINERAL RESOURCES:</u> Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?			X	
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local General Plan, specific plan or other land use plan?			X	

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

a) A mineral resource is land on which known deposits of commercially viable mineral or aggregate deposits exist. The designation is applied to sites determined by the State Division of Mines and Geology as being a resource of regional significance and is intended to help maintain any quarrying operations and protect them from encroachment of incompatible uses. Regarding aggregate resources on the project site, as a result of productive use the proposed expansion would result in the utilization, not loss, of known mineral resources of value to the region through the extraction and sale of the aggregate resources onsite. The continued use of the mineral resources extracted as part of the proposed expansion would create local jobs and make available the raw materials for projects that would be of value to the region and residents of the State for the next 80 years. Further, this use would be from an area designated as MRZ-2 by the State recognizing the value of the aggregate as a significant mineral deposit. Because the proposed project would continue to produce and make these mineral resources available for beneficial use within Shasta County and residents of the State for up to 80 years, this loss is not considered adverse in terms of the County’s environmental review pursuant to the CEQA.

Because the proposed project would use mineral resources and would not preclude the future extraction of additional mineral resources and would not result in the loss of availability of any known statewide or regionally important mineral resources, this evaluation concludes that the project would have a less-than-significant impact associated with the loss of availability of a known mineral resources of value to the region or residents of the State.

b) As discussed above under Item XII.a, regarding aggregate resources on the project site, as a result of productive use the project would result in the utilization of a known mineral resource of value to the region through the extraction and sale of the aggregate resources present onsite. Because the project would produce and make these mineral resources available for beneficial use within Shasta County and surrounding areas, this loss is not considered adverse in terms of the County’s environmental review pursuant to CEQA. Further, this use would be from an area designated as MRZ-2 by the State, recognizing the value of the aggregate as a significant mineral deposit.

Because the proposed project would use mineral resources and would not preclude the future extraction of additional mineral resources and would not result in the loss of availability of any known statewide or regionally important mineral resources, this evaluation concludes that the project would have a less-than-significant impact associated with the loss of availability of a locally important mineral resource recovery site.

Findings: In the course of the above evaluation, impacts associated with *Mineral Resources* were found to not be significant because of the inability of a project of this scope to create such impacts or the absence of project characteristics producing effects of this type. The effects determined not to be significant are not required to be included in primary analysis sections of the EIR. As such, impacts to *Mineral Resources* are not reasonably foreseeable and will not be addressed further in the EIR to be prepared for this project.

<u>XIII. NOISE:</u> Would the project result in:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	X			
b) Generation of excessive groundborne vibration or groundborne noise levels	X			
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted,				X

XIII. NOISE: Would the project result in:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

- a) The proposed project would not introduce new noise into the area; however, the increased truck traffic and hours of operation have the potential to result in the permanent increase of ambient noise levels that may exceed County standards. These impacts are potentially significant and will be further evaluated in the EIR.
- b) Mineral reserves would be removed through a combination of drilling, blasting, and excavation equipment. In surface mining, holes are drilled through the overburden, loaded with explosives, and discharged, shattering the rock in the overburden. All blasts would occur during daylight hours and only on regular business days (not on weekends or holidays). While the existing operation includes blasting to break up the rock in the sides and bottom of the quarry, there will be an increase in blasting activity when compared to the existing Use Permit. Further evaluation in the EIR is required.
- c) The project is not located within the vicinity of a private airstrip or an airport land use plan, or within two miles of a public airport or public use airport. The nearest airport to the project site is the Benton Airport located approximately 3.5 miles to the southeast. No impacts would occur in this regard.

Findings: In the course of the above evaluation, impacts associated with *Noise* were found to be potentially significant. Additional project and environmental data, further discussion and analysis of environmental impacts, recommendations for mitigations for potential impacts, and a mitigation monitoring plan, will be included in the EIR prepared for this proposed project.

XIV. POPULATION AND HOUSING: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

- a) The project would not induce substantial unplanned population growth in an area, either directly or indirectly. The proposed project would result in the construction of roadway infrastructure and does not include the development of new homes or businesses. Project implementation would only require the addition of up to 7 new full-time employees and 1 part-time employee which would be derived from the local labor pool. Therefore, it is not expected to induce substantial growth in the area. No impacts would occur in this regard.
- b) The project would not displace people or existing housing. The project does not include the demolition of any existing housing. No impacts would occur in this regard.

Findings: In the course of the above evaluation, impacts associated with *Population and Housing* were found to not be significant because of the inability of a project of this scope to create such impacts or the absence of project characteristics producing effects of this type. The effects determined not to be significant are not required to be included in primary analysis sections of the EIR. As such, impacts to *Population and Housing* are not reasonably foreseeable and will not be addressed further in the EIR to be prepared for this project.

XV. PUBLIC SERVICES: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Fire Protection?				X
Police Protection?				X
Schools?				X
Parks?				X
Other public facilities?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for:

Fire Protection

Fire protection services to the proposed project are currently provided by County and State agencies and private emergency responders. Implementation of the proposed project is not anticipated to significantly increase response times to the site or result in an increase in the demand for these protection services or require any additional fire facilities. No impacts are anticipated in this regard.

Police Protection

Police protection services to the proposed project are currently provided by the County. Implementation of the proposed roadway extension is not expected to significantly increase response times to the site or result in an increase in the demand for police protection services or require any additional law enforcement facilities. The proposed project does not include housing or any other infrastructure that would increase the local population and therefore is not considered significant enough to warrant any additional sworn or non-sworn peace officers. No impacts are anticipated in this regard.

Schools

Implementation of the proposed project will not result in an increase of student populations in unincorporated Shasta County. The proposed project does not result in an increase in housing or population in the County which would require additional educational facilities. Therefore, the proposed project would have no impact in this area.

Parks

The project is located in the unincorporated portion of Shasta County which does not have a formal park and recreation program normally found within incorporated cities. The need for additional parkland is primarily based on an increase in population to an area. Given that the proposed project would not increase the population of Shasta County, the project would not burden any parks in the surrounding area beyond capacity by generating additional recreational users. Therefore, the proposed project would not require the construction or expansion of park and recreational facilities and would also not result in an increase in demand for parks and recreation facilities in the surrounding area. No impacts would occur in this regard.

Findings: In the course of the above evaluation, impacts associated with *Public Services* were found to not be significant because of the inability of a project of this scope to create such impacts or the absence of project characteristics producing effects of this type. The effects determined not to be significant are not required to be included in primary analysis sections of the EIR. As such, impacts to *Public Services* are not reasonably foreseeable and will not be addressed further in the EIR to be prepared for this project.

XVI. RECREATION:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

- a) The County does not have a neighborhood or regional parks system or other County-maintained recreational facilities. The proposed project does not propose to add significant new numbers of people that would require housing and ancillary recreation facilities. Additionally, there are several National and State parkland facilities, national forests, and BLM holdings within the region available to potential park users. Therefore, the proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. A less-than-significant would occur in this regard.
- b) The project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment. School facilities are typically used for sports and recreation. The City of Redding, located to the east of the project, also has a number of recreational facilities. In addition, there are tens of thousands of acres of rivers, lakes, forests, and other public lands available for recreation in Lassen National Park, the Shasta and Whiskeytown National Recreation Areas, the National Forests, and other public land administered by the BLM. Implementation of the proposed project would not result in substantially increased use of any area recreational facilities and would therefore not require construction of new or expansion of any other existing recreational facilities. A less-than-significant would occur in this regard.

Findings: In the course of the above evaluation, impacts associated with *Recreation* were found to not be significant because of the inability of a project of this scope to create such impacts or the absence of project characteristics producing effects of this type. The effects determined not to be significant are not required to be included in primary analysis sections of the EIR. As such, impacts to *Recreation* are not reasonably foreseeable and will not be addressed further in the EIR to be prepared for this project.

XVII. TRANSPORTATION: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	X			
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	X			
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	X			
d) Result in inadequate emergency access?	X			

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

- a) On November 1, 2019, the Central the California Department of Transportation, District 2 (Caltrans) provided a response to Shasta County’s 2019 Notice of Preparation (NOP) for the previously considered onsite expansion of the quarry (GPA 19-0003, ZA 19-0002, UP 19-0007, RP 19-0001) (State Clearinghouse No. 2019090702). Comments and recommendations in the letter refer to the forthcoming EIR and the studies and data that will inform analysis of baseline conditions and potential impacts. Specific reference was made to the likely need to improve the intersection of SR-299 and Iron Mountain Road. A Traffic Assessment Report will be prepared for the proposed project. The Traffic Assessment Report will examine existing traffic volumes on roadways increases in congestion at intersections within the proposed project study area, including potential solutions

for the SR-299/Iron Mountain Road intersection. To address potential increases in truck traffic and potential impacts to pedestrian and bicycle safety, the forthcoming assessment will be examined and incorporated into the EIR.

- b) The proposed project's consistency with CEQA Guidelines Section 15064.3 will be evaluated in the EIR.
- c) During the Notice of Preparation (NOP) period and project scoping conducted by the County between September 2019 and November 2019, the County received feedback from members of the bicycling community related to bicycle safety concerns along Iron Mountain Road. These concerns mainly focused on the existing limited shoulder space between SR-299 and Keswick Dam Road that creates hazardous conditions and potential conflicts between bicycles and vehicles, particularly trucks. The volume of bicycle traffic (both mountain bikes and road bikes) along this segment of Iron Mountain Road has continued to increase over the past several years, raising concerns from the bicycling community that this hazard would be exacerbated with implementation of the proposed project. Several recommendations to enhance safety through the installation of new signage were provided to the County.

In addition, the area of the proposed project is located in the vicinity of several of Shasta County's most popular mountain biking trails. These facilities are located generally to the north, south, and west of the project site on the adjacent BLM parcels and are associated with the Rock Creek – Middle Creek Trail System and other regional trail facilities that connect to the Sacramento River Rail – Trial System. Trailhead parking is provided at various locations along Iron Mountain Road between SR-299 and Keswick Dam Road. As mentioned above, Iron Mountain Road is popular with on-road bicyclists and many off-road bicyclists use the segment of Iron Mountain Road adjacent to the proposed project to connect to French Fry and Trail 58/Middle Creek.

Similar to concerns raised regarding on-road bicycle safety along Iron Mountain Road, the County also received feedback from members of the off-road bicycling community regarding the potential impacts of the proposed project on the adjacent trail systems noted above. Specific concerns focused on aesthetic impacts from clearing and mining, noise from blasting, odor from asphalt operations, increase runoff to Middle Creek and Rock Creek, dust generation, and increase truck traffic along Iron Mountain Road. Mitigation, such as building and maintaining an alternative bike route to Iron Mountain Road that connects the French Fry Trail and Trail 58 trailheads, was recommended.

As the proposed project is expected to increase truck traffic volumes on Iron Mountain Road, this impact is potentially significant and will be further evaluated in the EIR.

- d) The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Currently, the County has not adopted a comprehensive emergency evacuation plan applicable to this area. In addition, neither Iron Mountain Road nor Keswick Dam Road is identified as a designated evacuation route by the County. However, Iron Mountain Road provides the primary access from SR-299 for residents and emergency crews to the area, including the community of Keswick. Keswick Dam Road intersects with Iron Mountain Road approximately 0.5 miles north of the site and provides important emergency ingress and egress. The potential for the proposed project to impact emergency response will be evaluated in the EIR.

Findings: In the course of the above evaluation, impacts associated with *Transportation* were found to be potentially significant. Additional project and environmental data, further discussion and analysis of environmental impacts, recommendations for mitigations for potential impacts, and a mitigation monitoring plan, will be included in the EIR prepared for this proposed project.

XVIII. TRIBAL CULTURAL RESOURCES: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<p>a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</p> <p>ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>			X	

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

- a) The identification of tribal cultural resources is a continuing process between the appropriate tribes or tribal representatives and CEQA lead agency. The appropriate tribes or tribal representative are the authority on identifying tribal cultural resources. The archival records search performed as part of the cultural resources analysis did not result in the identification of known tribal cultural resources within or near the study area. Furthermore, initial field review of the project area did not identify any signs of previously unidentified subsurface tribal cultural resources within or adjacent to the project area.

Pursuant to the Assembly Bill (AB) 52 Tribal consultation process, CEQA lead agencies consult with tribes that are traditionally and culturally affiliated with the project area and that have requested consultation pursuant to Public Resources Code (PRC) Section 21080.3.1. The purpose of the consultation is to determine whether a proposed project may result in a significant impact to tribal cultural resources that may be undocumented or known only to the tribe and its members. As set forth in PRC Section 21080.3.1(b), the law requires:

Prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation.

The County’s AB 52 contact list consists of Native American tribes that had submitted written requests for notification of CEQA projects within their geographic area of traditional and cultural affiliation as of October 7, 2019, when the County initiated consultation. The County sent a letter by certified mail on October 7, 2019 to the Wintu Tribe of Northern California and Toyon-Wintu Center. Return receipts for the certified letters indicate the letters were delivered on October 7, 2019. The County received no response to the letter.

Findings: In the course of the above evaluation, impacts associated with *Tribal Cultural Resources* were found to less-than-significant.

XIX. UTILITIES AND SERVICE SYSTEMS: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities, the construction or relocations of which could cause significant environmental effects?				X
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	X			
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				X
e) Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

- a) The project would not require or result in the relocation or construction of new or expanded water or, wastewater treatment facilities or expansion of existing storm water drainage, electric power, natural gas or telecommunications facilities, the construction or relocations of which could cause significant environmental effects. No impacts would occur in this regard.
- b) Approximately 960,000 gallons of water per year will be needed if all the aggregate used to produce 200,000 tons of asphalt is washed, which is equivalent to 4.8 gallons per ton. Water will be obtained from the two recycle ponds east of the wash plant that receive the used wash water which is then recycled. It is unlikely the proposed project will substantially deplete groundwater supplies or interfere substantially with groundwater recharge. The proposed project will not require the acquisition or expansion of entitlements and there will be no need to develop infrastructure to connect to an existing water supply distribution facility. Therefore, the proposed project would not result in the exceedance of an allotted water supply for the County.

As noted above under Item X.a, the CVRWQCB previously recommended additional evaluation and analysis of the project's potential impact to groundwater resources. The hydrology assessment and any further studies necessary to determine the project's potential impact to groundwater resources will be fully analyzed in the EIR.

- c) The project would not result in the production of any wastewater. Because the proposed project will not connect to any water or wastewater treatment facilities, there would be no impact on the capacity of an existing water or wastewater treatment facilities and therefore, this impact will not be analyzed further in the EIR. No impacts are anticipated in this regard.
- d) The project would not generate new solid waste and therefore would not generate waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. The Richard W. Curry/West Central Landfill has approximately 120 to 320 tons per day of capacity; therefore, the landfill would support the low volume of waste generated during construction of any necessary offsite improvements to support the proposed project. Recycling of construction debris would reduce the potential amount of waste disposed of at the Richard W. Curry/West Central Landfill and would contribute to the recycling goals set forth by Shasta County, California Building Code, and AB 939. Construction activities would be required to comply with all federal, State, and local statutes and regulations related to solid waste. No impact would occur in this regard.
- e) The project would comply with Federal, State, and local management and reduction statutes and regulations related to solid waste. The project will not generate any solid waste. The 1989 California Integrated Waste Management Act (AB 939) requires the County to attain specific waste diversion goals. In addition, the California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires expanded or new development projects to incorporate storage areas for recycling bins into the proposed project design. Reuse and recycling of construction debris would reduce operating expenses and save valuable landfill space.

AB 939, SB 1016, AB 341, and AB 1826 require the County to meet specific waste diversion goals. The Richard W. Curry West Central Landfill has available capacity to accommodate solid construction waste generated by the proposed project. In addition, the Anderson Landfill also has available capacity to accommodate solid construction waste generated by the proposed project. No impact would occur in this regard.

Findings: In the course of the above evaluation, impacts associated with *Utilities and Service Systems* were found to be potentially significant. Additional project and environmental data, further discussion and analysis of environmental impacts, recommendations for mitigations for potential impacts, and a mitigation monitoring plan, will be included in the EIR prepared for this proposed project.

XX. WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	X			
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	X			
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

- a) The County of Shasta and all cities within the County use the *Emergency Operations Plan* to respond to major emergencies and disasters. The *Emergency Operations Plan* identifies a broad range of potential hazards and a response plan for each. The Shasta County Sheriff's Department, California Highway Patrol, and other cooperating law enforcement agencies have primary responsibility for evacuations. These agencies work with the County Office of Emergency Services, and with responding fire department personnel who assess fire behavior and spread, which ultimately influence evacuation decisions. As of this time Cal Fire, Shasta County Fire Department, Shasta County Office of Emergency Services, Shasta County Sheriff's Department, and others have not adopted a comprehensive emergency evacuation plan applicable to this area.

All evacuations in the County follow pre-planned procedures to determine the best plan for the type of emergency. The designated County emergency evacuation and law enforcement coordinator is the sheriff. The evacuation coordinator is assisted by other law enforcement and support agencies in emergency events. Law enforcement agencies, highway/street departments, and public and private transportation providers would conduct evacuation operations. Activities would include law enforcement traffic control, barricades, signal control, and intersection monitoring downstream of the evacuation area, all with the objective of avoiding or minimizing potential backups and evacuation delays.

Another factor in the evacuation process would be a managed and phased evacuation declaration. Evacuating in phases, based on vulnerability, location, or other factors, enables subsequent traffic surges on major roadway to be minimized over a longer time frame and can be planned to result in traffic levels that flow more efficiently than when mass evacuations include large evacuation areas simultaneously. Law enforcement personnel and Shasta County Office of Emergency Services staff would be responsible for ensuring that evacuations are phased appropriately, taking into consideration the vulnerability of communities when making decisions.

It is acknowledged that the existing site has been used for disaster response staging such as during fire emergencies over the last two decades. The project site would continue to be available as a local staging area for emergency personal and/or be accessible to the public as a local safe zone during a wildfire event.

There are existing residents that to the north and east of the project site with a significant number of properties anticipated to be redeveloped in the coming months and years as evidenced by building permit records maintained by Shasta County. In the event of a wildfire at, or near the project site, existing and future residences and structures in the project vicinity would be at risk. The impact of increased truck traffic related to wildfire hazards will be further evaluated in the EIR.

- b) As noted above under Item IX.g, CAL FIRE currently identifies the project site as an SRA. In addition to establishing local or state responsibility for wildfire protection in a specific area, CAL FIRE designates areas as very high fire hazard severity zones (VHFHSZ) or non-VHFHSZ. The project site is designated as VHFHSZ by CAL FIRE.

The risk of potential ignitions resulting from mining activities onsite would be considered very low for the existing cleared areas of the site with non-combustible land cover (mine production areas, rock crushing/screening plant, washing operations, mobile office trailer, truck scales, and settling/recycling ponds). However, mineral reserves would continue to be removed through a combination of drilling, blasting, and excavation equipment, albeit, increased when compared to existing conditions. The potential wildfire risk associated with increased onsite basting activity will be evaluated in the EIR.

- c) The proposed project is required to comply with defensible space standards outlined within California Public Resources Code 4291, including the standards outlined within Shasta County Code Section 8.08 and Section 8.10. The proposed project would also comply with all applicable California Fire Code requirements for constructing and operating extraction and processing activities in a VHFHSZ, including, but not limited to, specific requirements for water supply, signage, and fire department access.

The existing facility maintains two points of access that would continue to facilitate site access by responding fire agency personnel and other emergency responders, if necessary. In addition, the proposed project does not include the addition of new overhead power lines or other infrastructure or features that are expected to exacerbate wildfire risk or result in additional temporary or permanent impacts.

Development of the proposed project, in compliance with applicable with defensible space standards reduces the potential for the proposed project to impact adjacent residences from wildfire events, as well as reducing the potential that the proposed project would be significantly damaged from offsite wildfires burning onto the project site. The proposed use permit and reclamation plan amendments would continue to be subject to all applicable Shasta County Code requirements and defensible space requirements pursuant to California Public Resources Code 42911. As a result, the proposed project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Impacts are less-than-significant in this regard.

- d) The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. The location of the proposed project does not fall within a FEMA flood zone, nor are there any sheer or unstable cliffs in the immediate area.

Development of the proposed project would not significantly alter existing onsite drainage patterns or impervious services compared to existing conditions. During each mine phase stormwater runoff will continue to be routed through the various ponds, with all but a small portion eventually discharged from Settling Pond No. 3. Stormwater from Pond No. 4 can also be routed around the Settling Ponds and discharged directly to the ditch that is tributary to Middle Creek, but this has seldom occurred (LAA 2020). As a result, overall water management and stormwater runoff control of the proposed project will be similar to current operations. The proposed project will continue to be covered under the State of California General Industrial Storm Water Permit Order Number 2014-0057-DWQ and implement Best Management Practices (BMPs) to reduce impacts to storm water quality. In addition, during the mine's operational history there have been no significance surface failures and the proposed finished mine slope of 45 degrees is considered stable (Bajada 2020). Therefore, the proposed project does not pose a significant risk of landslides.

Considering these project site features and characteristics, potential future post-fire conditions are not expected to increase risks associated with runoff and erosion. Considering the project site's phased reclamation and implementation of erosion control BMPs, potential impacts associated with runoff, post-fire slope instability, or drainage changes are considered less-than-significant.

Findings: In the course of the above evaluation, impacts associated with *Wildfire* were found to be potentially significant. Additional project and environmental data, further discussion and analysis of environmental impacts, recommendations for mitigations for potential impacts, and a mitigation monitoring plan, will be included in the EIR prepared for this proposed project.

¹ Shasta County. Statement of Conditions. Use Permit Condition No. 54. Crystal Creek Aggregate. 2007.

XIX. <u>MANDATORY FINDINGS OF SIGNIFICANCE:</u>	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below the self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	X			
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	X			
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	X			

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following determinations can be made:

- a) Based on the discussion and findings in Section IV. *Biological Resources*, there is evidence to support a finding that the proposed project would have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below the self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.
- b) Based on the discussion and findings in all Sections above, there is evidence to suggest that the proposed project would have impacts that are cumulatively considerable. A review of cumulative impacts for each issue area that has been identified as potentially significant will be required pursuant State *CEQA Guidelines* §15130. A determination of significance will be made for each issue.
- c) Based on the discussion and findings in all Sections above, there is evidence to support a finding that the proposed project has potential environmental effects which may cause substantial adverse effects on human beings, either directly or indirectly. The EIR will include a comprehensive review of existing conditions, potential project impacts, and will recommend mitigation measures to reduce the level of significant related to short-term construction and long-term operations, as necessary.

Findings: Additional project and environmental data, further discussion and analysis of environmental impacts, recommendations for mitigations for potential impacts, and a mitigation monitoring plan, will be included in the EIR prepared for this proposed project.

SOURCES OF DOCUMENTATION FOR INITIAL STUDY CHECKLIST

All headings of this source document correspond to the headings of the initial study checklist. In addition to the resources listed below, initial study analysis may also be based on field observations by the staff person responsible for completing the initial study. Most resource materials are on file in the office of the Shasta County Department of Resource Management, Planning Division, 1855 Placer Street, Suite 103, Redding, CA 96001, Phone: (530) 225-5532.

GENERAL PLAN AND ZONING

1. Shasta County General Plan and land use designation maps.
2. Applicable community plans, airport plans and specific plans.
3. Shasta County Zoning Ordinance (Shasta County Code Title 17) and zone district maps.

ENVIRONMENTAL IMPACTS

I. AESTHETICS

1. Shasta County General Plan, Section 6.8 Scenic Highways, and Section 7.6 Design Review.
2. Zoning Standards per Shasta County Code, Title 17.

II. AGRICULTURAL AND FORESTRY RESOURCES

1. Shasta County General Plan, Section 6.1 Agricultural Lands.
2. Shasta County Important Farmland 2016 Map, California Department of Conservation.
3. Shasta County General Plan, Section 6.2 Timber Lands.
4. Soil Survey of Shasta County Area, California, published by U.S. Department of Agriculture, Soil Conservation Service and Forest Service, August 1974.

III. AIR QUALITY

1. Shasta County General Plan Section, 6.5 Air Quality.
2. Northern Sacramento Valley Air Basin, 2018 Air Quality Attainment Plan.

IV. BIOLOGICAL RESOURCES

1. Shasta County General Plan, Section 6.2 Timberlands, and Section 6.7 Fish and Wildlife Habitat.
2. Designated Endangered, Threatened, or Rare Plants and Candidates with Official Listing Dates, published by the California Department of Fish and Wildlife.
3. Natural Diversity Data Base Records of the California Department of Fish and Wildlife.
4. Federal Listing of Rare and Endangered Species.
5. Shasta County General Plan, Section 6.7 Fish and Wildlife Habitat.
6. State and Federal List of Endangered and Threatened Animals of California, published by the California Department of Fish and Wildlife.
7. Natural Diversity Data Base Records of the California Department of Fish and Wildlife.

V. CULTURAL RESOURCES

1. Shasta County General Plan, Section 6.10 Heritage Resources.
2. Records of, or consultation with, the following:
 - a. The Northeast Information Center of the California Historical Resources Information System, Department of Anthropology, California State University, Chico.
 - b. State Office of Historic Preservation.
 - c. Local Native American representatives.
 - d. Shasta Historical Society.
3. Jensen, Sean Michael. Archaeological Inventory Survey for the Crystal Creek Aggregate Relicensing Project c. 150-acres Along Ironside Mountain, Shasta County. 2006.
4. Jensen, Sean Michael. Cultural resources Inventory Survey for the Crystal Creek Aggregate General Plan Amendment and Rezone Project circa 110 acres in Shasta County. 2019.

VI. ENERGY

1. California Global Warming Solutions Act of 2006 (AB 32)
2. California Code of Regulations Title 24, Part 6 – California Energy Code

VII. GEOLOGY AND SOILS

1. Shasta County General Plan, Section 5.1 Seismic and Geologic Hazards, Section 6.1 Agricultural Lands, and Section 6.3 Minerals.
2. County of Shasta, Erosion and Sediment Control Standards, Design Manual
3. Soil Survey of Shasta County Area, California, published by U.S. Department of Agriculture, Soil Conservation Service and Forest Service, August 1974.
4. Alquist - Priolo, Earthquake Fault Zoning Maps.
5. Bajada Geosciences, Inc. 2020. *Geotechnical Report Crystal Creek Aggregate Quarry Expansion, Shasta County, California*. April 10, 2020.

VIII. GREENHOUSE GAS EMISSIONS

1. Shasta Regional Climate Action Plan
2. California Air Pollution Control Officers Association (White Paper) CEQA & Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act

IX. HAZARDS AND HAZARDOUS MATERIALS

1. Shasta County General Plan, Section 5.4 Fire Safety and Sheriff Protection, and Section 5.6 Hazardous Materials.
2. County of Shasta Multi-Hazard Functional Plan
3. Records of, or consultation with, the following:
 - a. Shasta County Department of Resource Management, Environmental Health Division.
 - b. Shasta County Fire Prevention Officer.
 - c. Shasta County Sheriff's Department, Office of Emergency Services.
 - d. Shasta County Department of Public Works.
 - e. California Environmental Protection Agency, California Regional Water Quality Control Board, Central Valley Region.

X. HYDROLOGY AND WATER QUALITY

1. Shasta County General Plan, Section 5.2 Flood Protection, Section 5.3 Dam Failure Inundation, and Section 6.6 Water Resources and Water Quality.
2. Flood Boundary and Floodway Maps and Flood Insurance Rate Maps for Shasta County prepared by the Federal Emergency Management Agency, as revised to date.
3. Records of, or consultation with, the Shasta County Department of Public Works acting as the Flood Control Agency and Community Water Systems manager.
4. Lawrence & Associates. 2020. *Hydraulic Evaluation for Proposed Quarry Changes, Chrystal Creek Aggregate, Inc.* November 2020.

XI. LAND USE AND PLANNING

1. Shasta County General Plan land use designation maps and zone district maps.
2. Shasta County Assessor's Office land use data.

XII. MINERAL RESOURCES

3. Shasta County General Plan Section 6.3 Minerals.

XIII. NOISE

1. Shasta County General Plan, Section 5.5 Noise and Technical Appendix B.

XIV. POPULATION AND HOUSING

1. Shasta County General Plan, Section 7.1 Community Organization and Development Patterns.
2. Census data from U.S. Department of Commerce, Bureau of the Census.
3. Census data from the California Department of Finance.
4. Shasta County General Plan, Section 7.3 Housing Element.
5. Shasta County Department of Housing and Community Action Programs.

XV. PUBLIC SERVICES

1. Shasta County General Plan, Section 7.5 Public Facilities.
2. Records of, or consultation with, the following:
 - a. Shasta County Fire Prevention Officer.
 - b. Shasta County Sheriff's Department.
 - c. Shasta County Office of Education.
 - d. Shasta County Department of Public Works.

XVI. RECREATION

1. Shasta County General Plan, Section 6.9 Open Space and Recreation.

XVII. TRANSPORTATION/TRAFFIC

1. Shasta County General Plan, Section 7.4 Circulation.
2. Records of, or consultation with, the following:
 - a. Shasta County Department of Public Works.
 - b. Shasta County Regional Transportation Planning Agency.
 - c. Shasta County Congestion Management Plan/Transit Development Plan.
3. Institute of Transportation Engineers, Trip Generation Rates.

XVIII. TRIBAL CULTURAL RESOURCES

1. Tribal Consultation in accordance with Public Resources Code section 21080.3.1

XIX. UTILITIES AND SERVICE SYSTEMS

1. Field Reconnaissance
2. Records of, or consultation with, the following:

- a. Roadway Design Engineer.
- b. Shasta County Department of Resource Management, Environmental Health Division.
- c. Shasta County Department of Public Works.

XX. WILDFIRE

- 1. Office of the State Fire Marshall-CALFIRE Fire Hazard Severity Zone Maps

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

None

Appendix 5.6
2021 Scoping Meeting Presentation

Environmental Impact Report Scoping Meeting

Crystal Creek Aggregate, Inc.

Use Permit Amendment (UP-19-0007)

Reclamation Plan Amendment (RP-19-0001)


SCH No. 2019090702

Shasta County Department of Resource Management

Planning Division

March 9, 2021

Purpose of Today's Presentation

- ▶ Welcome and Staff Introductions
 - ▶ Purpose of Scoping
 - ▶ Project Background and Overview
 - ▶ Purpose of CEQA
 - ▶ Approach to Environmental Analysis
 - ▶ Environmental Impact Report Process
 - ▶ Participation in the CEQA Process
- 

County Staff and Consultant Team

- ▶ Shasta County Planning Staff
 - Tara Petti, Associate Planner
 - Adam Fieseler, Planning Manager
 - Paul Hellman, Director of Resource Management
- ▶ County's EIR Consultant – SHN Consulting
 - Bruce Grove, Principal

Purpose of Scoping Meeting

- ▶ Receive additional input from the public on environmental issues that the Draft EIR should address
- ▶ The County has chosen to hold this meeting to enhance public participation as part of the project's CEQA review
- ▶ Today's meeting is not intended as a forum to discuss the merits of the proposed project
 - Merits may be discussed a future hearings with the Planning Commission

Project Roles and Responsibilities

- ▶ Crystal Creek Aggregate, Inc., submitted an application to Shasta County to approve a Use Permit Amendment and Reclamation Plan Amendment
- ▶ Shasta County is the “Lead Agency” for CEQA review of the project
- ▶ Shasta County has retained SHN Consulting to prepare an EIR for the project

Project Roles and Responsibilities

- ▶ SHN works for Shasta County, not the project applicant
- ▶ Avoids conflict of interest
- ▶ The applicant has provided funds to the County to prepare the EIR
- ▶ Local taxpayer dollars are not used

Project Background

- ▶ Originally Permitted on February 22, 1990 (UP-24-90 and RP-1-90)
- ▶ *2008*: GPA-07-005, ZA-07-020, UP-07-020, and RP-07-022 approved by County
- ▶ *2019*: GPA-19-0003, ZA-19-0002, UP-19-0007, and RP-19-0001 were submitted
- ▶ *2020*: Applicant voluntarily repeals applications to redesign the project based on input received
- ▶ *2021*: Applicant submits revised Use Permit and Reclamation Plan applications

2019 vs 2021 Application

CRYSTAL CREEK AGGREGATE 2019 & 2021 SUBMISSION DIFFERENCES		
Project Component	09/30/2019 NOP	02/19/2021 NOP
Project Area	179.97 Ac	179.97 Ac
Use Permit Area	179.97 Ac	179.97 Ac
<i>Mining (Quarry) Area</i>	<i>102.25 Ac</i>	<i>57.31 Ac</i>
<i>Plant Site & Stockpiles</i>	<i>46.83 Ac</i>	<i>53.38 Ac</i>
<i>Other Lands*</i>	<i>30.89 Ac</i>	-
<i>Remaining Mineral Resource Area*</i>	-	<i>69.28 Ac</i>
Reclamation Plan Area	179.97 Ac	110.69 Ac

*Area around the northern, western & southern areas of the mining area references as “Other Lands” in the 09/30/2019 NOP project description.

2019 vs 2021 Application

CRYSTAL CREEK AGGREGATE 2019 & 2021 SUBMISSION DIFFERENCES		
Project Component	09/30/2019 NOP	02/19/2021 NOP
General Plan Amendment	Yes	No
<i>N-O to MR</i>	<i>28.46 Ac</i>	<i>N/A</i>
Rezoning	Yes	No
<i>U to MR</i>	<i>28.46 Ac</i>	<i>N/A</i>
Total Aggregate To Be Mined		
<i>Million Cubic Yards</i>	<i>37.29</i>	<i>12.7</i>
<i>Million Tons</i>	<i>74.58</i>	<i>25.4</i>
Annual Aggregate To Be Mined		
<i>Million Cubic Yards</i>	<i>450,000</i>	<i>250,000</i>
<i>Million Tons</i>	<i>900,000 Tons</i>	<i>500,000 Tons</i>
Mining Phases	11	3
Mining Termination Date	06/15/2169	12/31/2099
Years of Operation	150	79

2019 vs 2021 Application

CRYSTAL CREEK AGGREGATE 2019 & 2021 SUBMISSION DIFFERENCES		
Project Component	09/30/2019 NOP	02/19/2021 NOP
Blasting Days Per Year	40	24
Asphalt Plant	Yes	Yes
Daily Truck Trips	1,912	1,062
<i>AM Peak Truck Trips</i>	221	123
<i>PM Peak Trips</i>	111	62
Mining Area Wildlife Escape Routes	No	Yes
All Native Species Revegetation	No	Yes
Pond #6 Area		
<i>Area</i>	66.85 Ac	32.67 Ac
<i>Depth</i>	100 Ft	60 Ft
<i>Pond Bench Width</i>	36 Ft	44 Ft
<i>Meandering Drainage Course</i>	No	Yes
<i>Depth</i>	100 Ft	60 Ft

Purpose of CEQA

- ▶ A system of checks & balances for land use development & management actions
- ▶ Evaluate anticipated physical environmental effects
- ▶ Identify ways to avoid or reduce those effects
- ▶ Public opportunity to comment on the environmental issues
- ▶ Provide information to decision makers and public about environmental consequences of actions *before they are made*

What CEQA Does Not Do

- ▶ Advocate for or oppose a project
- ▶ Require project denial due to adverse effects
- ▶ Address economic or social concerns
- ▶ Discuss the merits of the proposed project

The merits of the project may be discussed at future public hearings with the Planning Commission

Purpose of Notice of Preparation

- ▶ Public and agency *input* on the scope and content of the environmental impact analysis
- ▶ Scoping comments inform the scope of the Draft EIR's analysis:
 - Potentially significant environmental effects to be analyzed
 - Potential mitigation measures
 - Alternatives to be considered
 - Identify issues that should not be studied in detail
- ▶ Comments received will be summarized in a Scoping Report and included in the Draft EIR

Environmental Impact Report (EIR)

- ▶ Highest level of environmental review under CEQA
- ▶ Extensive public review and input process
- ▶ Objective disclosure document focusing on:
 - Anticipated physical environmental impacts
 - Ways in which the significant effects can be mitigated
 - Alternatives to the proposed project that could reduce or eliminate significant effects

EIR (continued)

- ▶ Adequacy of the EIR measured by:
 - Independent review in good faith
 - Full disclosure of all potential environmental impacts
 - Findings and conclusions based on substantial evidence
 - *Information based on facts, not speculation*
 - Unbiased document that neither supports nor opposes the project

Educate decision makers to make an informed decision on the project

Analysis in the Draft EIR

- ▶ Threshold-based Analysis
- ▶ Short-Term Impacts
- ▶ Long-Term Impacts
- ▶ Cumulative Impacts
- ▶ Project Alternatives
- ▶ Identify feasible mitigation measures to avoid or reduce impacts
- ▶ Identify significant unavoidable impacts

Degree of Impact

Mitigation Required

Significance Threshold

Less Than Significant

Snapshot of CEQA Process

- ▶ NOP 30–day Public Circulation
- ▶ NOP comment period ends on *March 22, 2021 at 5:00 p.m.*
- ▶ Draft EIR (45–day public review)
- ▶ Final EIR
 - Responses to comments
 - Changes or corrections to the Draft EIR
 - Mitigation Monitoring Program
- ▶ Responses provided to commenting agencies
- ▶ EIR Hearings

Public Participation the “Backbone of CEQA”

- ▶ Public comments are encouraged during this meeting
- ▶ Written comments will be accepted instead of or in addition to verbal comments
- ▶ Please limit comments to environmental issues to be analyzed in the EIR
- ▶ Discussions of the merits of the proposed project is reserved for future hearings

Submission of Written Comments

- ▶ Please submit written comments (or e-mails) to:

Shasta County

Department of Resource Management

Planning Division

Crystal Creek Aggregate, Inc. (UP 19-0007 & RP 19-0001)

NOP Comments

Attention: Tara Petti

1855 Placer Street, Suite 103

Redding, CA 96001

tpetti@co.shasta.ca.us

- ▶ Comments must include, name, address, e-mail, or contact number

Future Public Comment Opportunities

- ▶ Draft EIR 45-day Public Circulation
- ▶ Planning Commission Final EIR Certification Hearing

Public Comments

Appendix 5.7
Comment Letters Received in Response to the 2021 NOP

Government Agencies

FW: Revised NOP for EIR (Crystal Creek Aggregate Expansion) - UP19-0007/RP19-0001

Tara Petti <tpetti@co.shasta.ca.us>

Thu 2/25/2021 4:44 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Russ Wenham <rwenham@ci.anderson.ca.us>

Sent: Tuesday, February 23, 2021 2:29 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Revised NOP for EIR (Crystal Creek Aggregate Expansion) - UP19-0007/RP19-0001

Tara,

Thank you for the opportunity to comment on the Revised NOP.

The City of Anderson does not have any comments to offer at this time.

Russ Wenham

Director of Engineering and Development

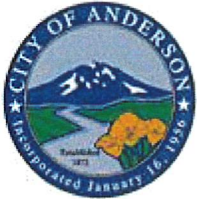
1887 Howard Street 2nd Floor

Anderson, CA 96007

Phone: (530) 378.6643

Cell: (530) 953.6486

rwenham@ci.anderson.ca.us





NATIVE AMERICAN HERITAGE COMMISSION

February 22, 2021

Tara Petti, Associate Planner
Shasta County Department of Resource Management
1855 Placer Street, Suite 103
Redding, CA 96001

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Stenslie
Chumash

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

Re: 2019090702, Crystal Creek Aggregate Use Permit Amendment (UP-19-007); Reclamation Plan Amendment (RA-19-0001) Project, Shasta County

Dear Ms. Petti:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

RECEIVED

MAR 09 2021

COUNTY OF SHASTA
PERMIT COUNTER

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
- c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e. Please note that a federally recognized California Native American tribe or a non-federally recognized California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

- b.** The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

- 3.** Contact the NAHC for:
 - a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

- 4.** Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Nancy.Gonzalez-Lopez@nahc.ca.gov.

Sincerely,



Nancy Gonzalez-Lopez
Cultural Resources Analyst

cc: State Clearinghouse



March 15, 2021

Tara Petti
Shasta County
Department of Resource Management
1855 Placer Street, Suite 103
Redding, CA 96001

Copy sent via email: tpetti@co.shasta.ca.us

SUBJECT: Crystal Creek Aggregate Expansion Project; Revised Notice of Preparation;
State Clearinghouse No. 2019090702

Dear Ms. Petti:

Thank you for including the Department of Conservation's Division of Mine Reclamation (Division) in the environmental review process for the Crystal Creek Aggregate Expansion Project (Proposed Project) Revised Notice of Preparation (NOP). The NOP indicates that Shasta County (County), as lead agency under the California Environmental Quality Act (CEQA), will prepare an Environmental Impact Report (EIR) for the Proposed Project.

As described in the NOP, the Proposed Project will amend the existing use permit (UP 19-0007) and reclamation plan (RP 19-0001) to modify the design of the existing quarry of approximately 57.31 acres and install and operate an asphalt plant and permanent concrete recycle area within the existing plant area of approximately 53.38 acres. The use permit area is proposed to be expanded by an additional 69.28 acres to serve to buffer lands to the south, west, and north from mine related activities. The amount of aggregate mined would be increased, as would the hours of operation, and yearly blasting maximums. The estimated life of the mining operation would increase from Year 2072 to Year 2099.

The Division's primary focus is on active surface mining operations; however, the Division also addresses issues related to abandoned (pre-1976) legacy mines. Additionally, the Division has review responsibilities associated with lead agency implementation of SMARA. SMARA provides a comprehensive surface mining and reclamation policy to assure that:

- Adverse environmental effects of surface mining operations are prevented or minimized and mined lands are reclaimed to a usable condition which is readily adaptable for alternative land uses.
- Production and conservation of minerals are encouraged, while giving consideration to values relating to recreation, watershed, wildlife, range and forage, and aesthetic enjoyment.
- Residual hazards to the public health and safety are eliminated.

Ms. Tara Petti
Revised NOP for EIR
March 15, 2021

Division staff has reviewed the subject NOP pursuant to the CEQA and State CEQA Guidelines and offers no comments at this time.

The Division requests to be included on the distribution list for this Proposed Project. Additionally, the Division requests that any subsequent project documents (e.g., the Draft EIR, hearing notices for the Draft and Final EIRs, and any supplemental environmental documents), as well as a copy of the certified Final EIR, be sent to the Division 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) 323-9198.

Sincerely,

Carol E. Atkins, Manager
Environmental Services Unit

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

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



Central Valley Regional Water Quality Control Board

17 March 2021

Tara Petti, Associate Planner
Shasta County Department of Resource Management, Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001

REVISED NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT, CRYSTAL CREEK AGGREGATE EXPANSION PROJECT, USE PERMIT AMENDMENT 19-0007 AND RECLAMATION PLAN AMENDMENT 19-0001), STATE CLEARINGHOUSE #2019090702, REDDING, SHASTA COUNTY

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) is a responsible agency for this project, as defined by the California Environmental Quality Act (CEQA). On 22 February 2021, we received your request for comments on the Revised Notice of Preparation (NOP) for an Environmental Impact Report (EIR) for the Crystal Creek Aggregate Expansion Project (Project). Included with the NOP was the February 2021 Environmental Initial Study (Initial Study) for the Project.

Central Valley Water Board staff provided written comments to Shasta County on the 2019 NOP for the Project on 29 October 2019; the letter is attached for reference.¹ The Revised NOP has been issued as a result of "significant changes" to the 2019 project proposal. Notable changes to the project scope include the elimination of the previously proposed general plan amendment and zone plan amendment.

Central Valley Water Board staff review of the Revised NOP and Initial Study find that staff comments on the Project provided in the 29 October 2019 NOP comment letter remain applicable to the Revised NOP and Initial Study. Please incorporate the comments from our 29 October 2019 letter as part of the record for the Revised NOP and Initial Study.

¹ Central Valley Water Board staff response to Shasta County's 2019 NOP for the previously considered onsite expansion of the quarry (General Plan Amendment (GPA) 19-0003, Zone Plan Amendment (ZA) 19- 0002, Use Permit 19-0007, and Reclamation Plan Amendment 19-0001). The current NOP does not include a GPA and ZA.

The Initial Study references the Central Valley Water Board's 29 October 2019 comment letter and discusses a planned hydrology assessment, as follows²:

"Comments and recommendations in the letter refer to the forthcoming EIR and the studies and data that will inform analysis of baseline conditions and potential impacts. Specific reference was made to surface water and groundwater quality. Additional comments and recommendations, in general, referred to: mine pit water quality; perpetual management of mine pit lake water level; cyanobacterial blooms; impacts to hydrogeology; wastewater treatment and disposal, among other issues.

A hydrology assessment will be prepared to address potential impacts to surface water and groundwater resources based on the applicable recommendations of CVRWQCB's October 29, 2019 letter and any further information provided by CVRWQCB during this NOP process. The hydrology assessment and any further studies necessary to determine the project's potential impacts on surface water and groundwater resources will be fully analyzed in the EIR."

It is unclear to Central Valley Water Board staff whether the proposed "hydrology assessment" will encompass the full extent of the requested information and/or studies discussed in the 29 October 2019 comment letter. Therefore, we have included the requested information and/or studies as an itemized list below. Please refer to the 29 October 2019 comment letter for additional information and context.

1. **Water Management During Active Quarrying.** It is unclear if the water within the quarry will limit mining activities and if dewatering of the quarry will be required to access the minable materials. If dewatering of the quarry will be necessary, the project does not include a clear description of how these activities would be conducted and where this water would be discharged.

The project should identify the water management approach for the quarry and should include contingencies for extreme conditions (e.g., pit overflow, exceedance of detention basin capacity, interruptions of quarry operations when dewatering is not occurring). The EIR should be supported by hydrologic studies and a water balance that provide the design-basis for the water management approach (e.g., sizing of detention basins based on estimated water volumes to be managed).

2. **Mine Pit Lake Water Quality.** The EIR should be supported by a study that evaluates the anticipated water quality of the mine pit lake so appropriate water management protocols, compliant with applicable regulatory requirements, can be designed and implemented. The study should assess temporal trends in mine pit lake water quality under drought and high precipitation conditions. The study

² Environmental Initial Study, Section X. Hydrology and Water Quality.

should also assess potential impacts to surface water and groundwater based on the anticipated pit water quality.

3. **Cyanobacteria Blooms.** Cyanobacteria blooms within the quarry could have the potential for the release of cyanobacteria toxins from the quarry in the event water within the quarry is discharged to onsite storm water drainages. The potential for cyanobacterial blooms within the quarry and potential impacts to water quality should be further evaluated.
4. **Pit Impacts on Project Area Hydrology.** The EIR should be supported by hydrologic studies that identify anticipated impacts in the Project area, including potential impacts to nearby groundwater wells and surface water features and the anticipated water level in the mine pit lake. The studies should assess representative low and high precipitation periods and should include an annual water balance for the mine pit.
5. **Historical Mining Activity in Project Area.** The environmental assessment should include inventorying potential mines or adits and mine workings in the Project area as part of the EIR process. This information is needed to support projections of the mine pit lake water quality and potential hydrologic effects induced by the Project.
6. **Geology of Project Area.** Please include a discussion of the erosion potential of the pit slope during active quarry operations and post-reclamation conditions. The Project should be supported by a slope stability analysis of the pit slopes during the active life of the quarry and under post-reclamation conditions.
7. **Wastewater Treatment and Disposal.** The current proposal does not include the expansion or construction of additional process water ponds. Central Valley Water Board staff has concerns that proposed increase in aggregate production may require the expansion of existing ponds or construction of additional process water ponds. The impacts to water quality in the existing or additional ponds will need to be evaluated to ensure that process wash water does not pose a threat to water quality.

The proposed Project also includes the addition of an asphalt batch plant (batch plant) onsite. It is proposed the batch plant will be powered by propane gas which reduces its emissions when compared to emissions produced by an oil-fired batch plant. There is no information provided if any water will be used during the batch plants operation and if any subsequent wastewater would be produced.

If you have any questions or comments regarding the Central Valley Water Board's comments on the Project, please contact me at (530) 226-3425 or by email at Bryan.Smith@waterboards.ca.gov.

Bryan J. Smith, P.E.

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Water Boards

Bryan J. Smith, P.E.
Supervising Water Resource Control Engineer

SG: nb

Encl: Comments on Crystal Creek Aggregate Expansion Project, 29 October 2019

cc w/encl: Jerry Comingdeer, Crystal Creek Aggregate, Inc., Redding
10936 Iron Mountain Road, Redding CA 96001
State Clearinghouse, Sacramento

cc w/encl
via email: Amy Henderson, Department of Fish and Wildlife, Region 1, Redding
amy.henderson@wildlife.ca.gov
Carla Serio, Shasta County Environmental Health Division, Redding
Matthew Roberts, U.S. Army Corps of Engineers, Redding
Matthew.J.Roberts@usace.army.mil



Central Valley Regional Water Quality Control Board

29 October 2019

Lio Salazar, Senior Planner
Shasta County Department of Resource Management, Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001

COMMENTS ON CRYSTAL CREEK AGGREGATE EXPANSION PROJECT (GENERAL PLAN AMENDMENT 19-0003, ZONING PLAN AMENDMENT 19-0002, USE PERMIT AMENDMENT 19-0007, AND RECLAMATION PLAN AMENDMENT 19-0001), STATE CLEARINGHOUSE #2019090702, REDDING, SHASTA COUNTY

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) is a responsible agency for this project, as defined by the California Environmental Quality Act (CEQA). On 29 September 2019, we received your request for comments on the Crystal Creek Aggregate Expansion Project (Project), State Clearinghouse (SCH) #2019090702.

PROJECT DESCRIPTION

Crystal Creek Aggregate (CCA) is proposing to expand their existing aggregate mining operation which was established at the project site in 1990 and subsequently expanded in 2008. The proposal would expand an approved mining use permit area of 110.24 acres and an approved reclamation plan area of 108.87 acres to 179.97 acres, in conjunction with General Plan and Zoning Plan amendments from Natural Resource Protection – Open Space (N-O) to Mineral Resource (MR) and from Unclassified (U) to Mineral Resource (MR), respectively. The overall Project area within which general plan, zoning plan, use permit and reclamation plan amendment approvals are requested is 179.97 acres.

The expansion also includes the deepening of the existing quarry by approximately 100 feet from the previously approved pond bottom elevation of 700 feet mean sea level (msl). High water surface elevation is proposed at 734 feet msl. The proposed project also identifies a spillway for the quarry pond at an elevation of 734 feet msl. The spillway discharges into Existing Pond No. 4 which receives storm water runoff from the plant site and contains an outfall that discharges to Middle Creek, which is a tributary of the Sacramento River. Middle Creek is located outside the east property boundary and flows south along Iron Mountain Road.

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

364 Knollcrest Drive, Suite 205, Redding, CA 96002 | www.waterboards.ca.gov/centralvalley

In addition to the expansion, CCA is also proposing to construct and operate an onsite asphalt batch plant.

CENTRAL VALLEY WATER BOARD COMMENTS

Based on our review of the information submitted for the proposed project, we have the following comments:

General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (CGP)

Construction activity, including demolition, resulting in a land disturbance of one acre or more must obtain coverage under the CGP. The Crystal Creek Aggregate Expansion Project must be conditioned to implement storm water pollution controls during construction and post-construction as required by the CGP. To apply for coverage under the CGP, the property owner must submit Permit Registration Documents electronically prior to construction. Detailed information on the CGP can be found on the State Water Board website [Water Boards Stormwater Construction Permits](https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml) (https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

Industrial Storm Water (IGP)

On 16 November 1990, the USEPA promulgated storm water regulations (40 CFR Parts 122, 123 & 124) which require specific categories of industrial facilities discharging storm water to obtain NPDES permits and to implement Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) to reduce or eliminate industrial storm water pollution. These requirements apply to industries with Standard Industrial Classifications (SIC) specified in Attachment A of the *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities* (IGP, Order 2014-0057-DWQ, NPDES No. CAS000001). Crystal Creek Aggregate's current industrial operations are covered under the IGP. A change to the facility and/or operations would require submittal and certification of new Industrial General Permit Registration Documents via the State Water Resource Control Board's Stormwater Multiple Application and Report Tracking System. Detailed information on the IGP can be found on the State Water Board website [Water Boards Storm Water Multiple Application and Report Tracking System](https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.xhtml) (<https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.xhtml>).

Clean Water Act (CWA) Section 401, Water Quality Certification

The Central Valley Water Board has regulatory authority over wetlands and waterways under the Federal Clean Water Act (CWA) and the California Water Code, Division 7 (CWC). Discharge of dredged or fill material to waters of the United States requires a CWA Section 401 Water Quality Certification from the Central Valley Water Board. Typical activities include any modifications to these waters, such as stream crossings, stream bank modifications, filling of wetlands, etc. 401 Certifications are issued in combination with CWA Section 404 Permits issued by the Army Corps of Engineers. The proposed project must be evaluated for the presence of jurisdictional waters,

including wetlands and other waters of the State. Steps must be taken to first avoid and minimize impacts to these waters, and then mitigate for unavoidable impacts. Both the Section 404 Permit and Section 401 Water Quality Certification must be obtained prior to site disturbance. Any person discharging dredge or fill materials to waters of the State must file a report of waste discharge pursuant to Sections 13376 and 13260 of the California Water Code. Both the requirements to submit a report of waste discharge and apply for a Water Quality Certification may be met using the same application form, found at [Water Boards 401 Water Quality Certification Application](http://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/wqc_application.pdf) (http://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/wqc_application.pdf)

Isolated wetlands and other waters not covered by the Federal Clean Water Act

Some wetlands and other waters are considered "geographically isolated" from navigable waters and are not within the jurisdiction of the Clean Water Act. (e.g., isolated wetlands, vernal pools, or stream banks above the ordinary high-water mark). Discharge of dredged or fill material to these waters may require either individual or general waste discharge requirements from the Central Valley Water Board. If the U.S. Army Corps of Engineers determine that isolated wetlands or other waters exist at the project site, and the project impacts or has potential to impact these non-jurisdictional waters, a Report of Waste Discharge and filing fee must be submitted to the Central Valley Water Board. The Central Valley Water Board will consider the information provided and either issue or waive Waste Discharge Requirements. Failure to obtain waste discharge requirements or a waiver may result in enforcement action.

Both the requirements to submit a report of waste discharge and apply for a Water Quality Certification may be met using the same application form, found at [Water Boards Adopted Orders for Water Quality](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf) (http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf)

Water Management During Active Quarrying

The proposed project anticipates expanding and deepening of the existing onsite quarry. As a result of the proposed activities, a larger volume of water likely will be present within the quarry. The water within the quarry will likely originate from three main sources: direct precipitation, storm water run-on, and exfiltrating groundwater. It is unclear if the water within the quarry will limit mining activities and if dewatering of the quarry will be required to access the minable materials. If dewatering of the quarry will be necessary, the project does not include a clear description of how these activities would be conducted and where this water would be discharged. Depending on the location and nature of discharge, dewatering activities could require a surface water discharge permit under our National Pollution Discharge Elimination System (NPDES) program or a land discharge permit under our Waste Discharge Requirements (WDRs) program.

The project should identify the water management approach for the quarry and should include contingencies for extreme conditions (e.g., pit overflow, exceedance of

detention basin capacity, interruptions of quarry operations when dewatering is not occurring). The environmental assessment should be supported by hydrologic studies and a water balance that provide the design-basis for the water management approach (e.g., sizing of detention basins based on estimated water volumes to be managed).

Regulatory Classification of Mine Pit Lake

Based on the mine pit lake water quality, the mine pit lake may be classified as a mining unit (surface impoundment) under California Code of Regulations, title 27, section 22470 et seq. Some of the requirements associated with classification as a mining unit include the issuance of waste discharge requirements, precipitation and drainage controls, water quality monitoring, post-closure maintenance, and closure and post-closure financial assurance. Post-closure financial assurance would need to be maintained in perpetuity and will be in place after release of Surface Mining and Reclamation Act (SMARA) reclamation bonds.

Title 27 also provides for closure financial assurances and under certain conditions allows the financial assurances established to comply with SMARA to be used as an alternate financial assurance mechanism (See Cal. Code Regs., tit. 27 22510(f) and (g)).

Perpetual Management of Mine Pit Lake Water Level

The Central Valley Water Board regulates several mine pit lakes that require active management of the water level after completion of reclamation. Based on our experience, evaporators are a commonly deployed method to control the lake water levels. Discharges from the mine pit lakes require coverage under a NPDES permit (whether intermittent or continuous discharges); some discharges require active or passive treatment. These costs associated with mine pit lake water level management must be included in the post-closure financial assurance cost estimate.

Mine Pit Lake Water Quality

The proposed mine pit lake may contain unique geochemistry relative to natural lakes. Pit lake water quality may be affected by groundwater flow, area geology and associated geochemistry, pH, trace element concentrations, evapo-concentration, and temperature. Water quality may be affected by surrounding inputs such as erosion (e.g., turbidity, total suspended solids, salinity) and nutrients, and any mineralized zones or abandoned mine workings intersected by the pit.

The environmental assessment should be supported by a study that evaluates the anticipated water quality of the mine pit lake so appropriate water management protocols, compliant with applicable regulatory requirements, can be designed and implemented. The study should assess temporal trends in mine pit lake water quality under drought and high precipitation conditions. The study should also assess potential impacts to surface water and groundwater based on the anticipated pit water quality.

During active quarry operations and post-reclamation, a monitoring program should be established to assess the pit water quality to ensure water management in compliance

with applicable regulations (such as California Code of Regulations, Title 27, section 22470 et seq.) and the Central Valley Water Board's *Water Quality Control Plan for the Sacramento and San Joaquin River Basin* (Basin Plan) water quality objectives (WQOs) for surface and/or groundwater.

Cyanobacteria Blooms

The proposed expansion of aggregate mining at the Facility, particularly the widening and deepening of the quarry will increase the volume of water contained within the quarry. The quarry and the large volume of water contained within it has the potential to create favorable conditions that could support the generation of toxic cyanobacteria blooms.

Cyanobacteria blooms within the quarry could have the potential for the release of cyanobacteria toxins from the quarry in the event water within the quarry is discharged to onsite storm water drainages. Storm water at the site is discharged to surface drainages that discharge into Middle Creek with is a tributary of the Sacramento River. This could potentially affect downstream drinking water suppliers and other beneficial uses. These conditions could persist or become exacerbated with rising temperatures expected from climate change. The potential for cyanobacterial blooms within the quarry and potential impacts to water quality should be further evaluated.

Pit Impacts on Project Area Hydrology

The proposed pit will affect the hydrology (hydrogeology and surface water hydrology) in the Project area, both during active quarry operations and post-reclamation as a mine pit lake. During active quarrying the pit may act as a sink, reducing groundwater flow to nearby groundwater wells and surface water features. Post-reclamation, the water level of the mine pit lake could create a groundwater mound; the water level should be managed to avoid uncontrolled overflow or other undesirable flow conditions.

The environmental assessment should be supported by hydrologic studies that identify anticipated impacts in the Project area, including potential impacts to nearby groundwater wells and surface water features and the anticipated water level in the mine pit lake. The studies should assess representative low and high precipitation periods and should include an annual water balance for the mine pit.

Historical Mining Activity in Project Area

Historical mining activities may have occurred in the Project area. The environmental assessment should include inventorying potential mines or adits and mine workings in the Project area as part of the environmental assessment. This information is needed to support projections of the mine pit lake water quality and potential hydrologic effects induced by the Project.

Geology of Project Area

The environmental review document will include a description of Project area geology. Please also include a discussion of the erosion potential of the pit slope during active quarry operations and post-reclamation conditions. The project should be supported by

a slope stability analysis of the pit slopes during the active life of the quarry and under post-reclamation conditions.

Wastewater Treatment and Disposal

The 20 November 2012 Report of Waste Discharge (ROWD) includes the discharge of aggregate wash water from an existing aggregate extraction facility to two onsite settling, percolation/ evaporation, and water reuse ponds. The ponds are set up as a water reuse system with no surface water discharge. The ROWD was deemed complete by Central Valley Water Board staff on 12 December 2012.

After subsequent review of the ROWD, Central Valley Water Board staff found that additional information was needed to evaluate the threat that aggregate wash water discharge may pose on waters of the state. Therefore, pursuant to California Water Code Section 13267 a Monitoring and Reporting program (MRP) was issued to the Facility on 16 October 2015. Information obtained from the MRP has not been fully evaluated and a determination on whether the Facility would require the issuance of a WDRs Order to regulate discharges at the Facility has also not been made.

The proposed project anticipates that the current peak aggregate production could increase from 270,000 tons per year (peak 2001) to 900,000 tons per year. The current proposal does not include the expansion or construction of additional process water ponds. Central Valley Water Board staff has concerns that proposed increase in aggregate production may require the need for expansion of existing ponds or construction of additional process water ponds. The impacts to water quality in the existing or additional ponds will need to be evaluated to ensure that process wash water does not pose a threat to water quality. Some of the concerns related to the wash water ponds include but are not limited to potential increases in salt concentrations, increases in dissolved and total metals concentrations, and changes in water chemistry parameters such as pH, electrical conductivity, and oxidation reduction potential.

The proposed project also includes the addition of an asphalt batch plant (batch plant) onsite. It is proposed the batch plant will be powered by propane gas with reduces its emissions when compared to emissions produced by an oil-fired batch plant. There is no information provided if any water will be used during the batch plants operation and if any subsequent wastewater would be produced. Activities associated with the production of asphalt material could include but are not limited to the use of water for any processing, cooling, or emissions needs. Also, no information is provided regarding on-site fuel management.

The California Water Code requires that any person proposing to discharge waste that could affect the quality of waters of the State to file a ROWD. Currently the Facility has an ROWD on file with the Central Valley Water Board for the existing facility and operations. Due to the potential threats to water quality that activities at the proposed facility pose, a new ROWD will likely be required so Central Valley Water Board staff can determine if operations associated with the proposed expansion project would need to be regulated by one or more Water Board programs.

29 October 2019

A ROWD, Form 200 and supporting information must be submitted at least 140 days prior to any discharges that differ in nature, characteristic, manner, and location than that described in the 20 November 2012 ROWD submittal. Information regarding submittal of a ROWD and additional information can be found on our website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

Closing

If you have any questions or comments regarding the Central Valley Water Board's comments on the Project, please contact me at (530) 226-3425 or by email at Bryan.Smith@waterboards.ca.gov.



Bryan J. Smith, P.E.
Supervising Water Resource Control Engineer

SG: ch

cc: Matthew Roberts, U.S. Army Corps of Engineers, Redding
CD DG Redding Northwest – Cross Development LLC, Carrollton, Texas
Crystal Creek Aggregate, Inc., Redding

cc via email: Amy Henderson, Department of Fish and Wildlife, Region 1, Redding
Carla Serio, Shasta County Environmental Health Division, Redding



Shasta County

DEPARTMENT OF RESOURCE MANAGEMENT
1855 Placer Street, Redding, CA 96001

Paul A. Hellman
Director

Dale J. Fletcher, CBO
Assistant Director

March 16, 2021

Shasta County Air Quality Management District's Areas of Concern to the Environmental Initial Study of Crystal Creek Aggregate Expansion Project Use Permit Amendment and Reclamation Plan Amendment.

The Shasta County Air Quality Management District (District) has reviewed the Environmental Initial Study (EIS) for the Crystal Creek Aggregate (CCA) Expansion Project (Project) dated February 2021. CCA is proposing to amend the existing use permit and reclamation plan to construct and operate an asphalt plant, reconfigure the existing quarry to increase production, and expand the use permit area. It is our understanding that an Environmental Impact Report (EIR) will be prepared for this Project. In addition to the items identified in the EIS, the District recommends that the EIR include the following information and analysis:

- The EIR should estimate and evaluate the potential health risk to existing and future populations within the Project area from all air contaminants resulting from the Project's construction and operation. A health risk assessment (HRA) should use current methodology as well as the latest emission factors and health risk procedures as outlined in the Office of Environmental Health Hazard Assessment (OEHHA) risk assessment guidelines.
- It is well documented that asphalt related facilities can be a source of offensive odors from the manufacturing process as well as the offsite transport of asphalt on main hauling routes. The EIR should include a dispersion modeling assessment of potential offensive odors resulting from operation of the proposed asphalt plant as well as the transportation of asphalt offsite. The EIR should contain a detailed discussion of the different types of asphalt that are commonly produced at asphalt plants (e.g. hot mix, warm mix, rubberized) and the specific odors associated with each type. If the type(s) of asphalt proposed to be produced at the facility will be limited, then the assessment may be limited to the type(s) proposed.
- Certain aspects of the Project will require a permit (Authority to Construct/Permit to Operate) from the District. Any applicable permit requirements including applicability to the United States Code of Federal Regulations should be discussed in the EIR.

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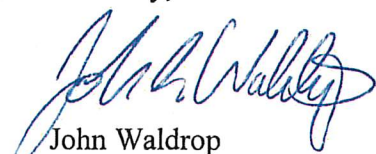
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- The applicable air quality plan for the Project area is the Northern Sacramento Valley Air Basin's 2018 Air Quality Attainment Plan (Attainment Plan). Due to the scale of the proposed project, further analysis is required to determine the extent to which increases in air pollutants generated from Project construction and operational activities may conflict with or obstruct implementation of the Attainment Plan as well as what, if any, mitigation measures should be incorporated to reduce the impacts to a level that is less-than-significant.
- The Project could potentially result in a cumulatively considerable net increase of criteria pollutants resulting from plant operation, on-site mobile equipment operation, and transportation emissions; therefore, these potential impacts should be evaluated in the EIR.
- A greenhouse gas (GHG) impact analysis should be included with an evaluation of the Project's consistency with the most recent draft of the AB 32 Scoping Plan by the California Air Resources Board and with the State's 2030, 2045, and 2050 climate goals. The analysis should include direct and indirect energy use.
- The District suggests that a Project overview contain a discussion of Crystal Creek Aggregate's historical operations including emissions reductions that have occurred as a result of eliminating onsite diesel/electric power and switching to "shore" electrical power.

We encourage the Shasta County Planning Division to contact District staff with any questions and/or to request assistance during the environmental review process. If you have any questions or would like to discuss District recommendations, please contact Kyle Willard at KPWillard@co.shasta.ca.us.

Sincerely,



John Waldrop
Shasta County Air Quality District Manager



United States Department of the Interior



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Redding Field Office
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Tara Petti
Associate Planner, Shasta County
tpetti@co.shasta.ca.us

Dear Tara Petti,

As an adjacent landowner, the Bureau of Land Management Redding Field Office appreciates the opportunity to review the Initial Study for and provide comments on the Crystal Creek Aggregate Expansion Project Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001).

The Redding Field Office interdisciplinary team reviewed the proposed project and the Initial Study. We have identified several areas of concern that the Redding Field Office would like to see considered in the EIR: recreation impacts, cultural site impacts, and weed management impacts.

Recreational impacts:

The BLM maintains 5 miles of trails in parcels adjacent to the project area (French Fry and Middle Creek). These trails are used primarily by local residents for biking, hiking, and nature-viewing. Primary times of use are in the morning, evenings and weekends. Smell, noise, and air pollution are known to occur with asphalt plant operations. The BLM is concerned that noise, smell, and air quality pollution and visual impacts from the expansion could affect the recreational quality on the nearby trails. Fresh air, natural light, and natural sounds are among the primary features which attract recreators to the area. The proposed increased timing of operations to 24 hours a day and 7 days a week concerns the BLM due to high recreational use on weekends, mornings, and evenings. Operations outside of normal business hours would impact trail experience in a new way from what is already occurring in the current operations. Consideration or timing limitations to reduce impact outside of normal business hours may alleviate some impact to recreational users.

It is unknown with the information provided how much the noise, smell and light pollution would carry over to the Sacramento Rail trail, BLM Keswick boat launch area and other surrounding recreation trails. Analyzing for impacts in the surrounding recreational assets may

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CALIFORNIA*, NEVADA*, OREGON*

* PARTIAL

be important, too.

Cultural site impacts:

The BLM would like to see a continuation of Native American Indian access to the Kett archaeological site and to the extent possible expanded activities directed as far away from the site as possible. This would help ameliorate any visual, auditory, and/or air quality issues with respect to visiting tribal members who hold the site as sensitive and sacred. Perhaps activity timing issues could be considered in this regard as well.

Weed management impacts:

Non-native invasive plants are a continuing issue in this area of Shasta County, on BLM lands and on adjacent private property. The BLM works to keep trails, roads, and other vector areas free of new weeds that are threatening to establish in the area such as stinkwort (*Dittrichia graveolens*) and keep more prevalent weeds from spreading. Increased size of disturbance and operation in the area will inevitably increase the area susceptible to the establishment and spread of infestations. Applicable measures such as routine surveys and treatments of non-native invasive species could help improve the cross-boundary weed management in this area.

If you would like to discuss these comments further, please reach out to Laura Brodhead, Assistant Field Manager at lbrodhead@blm.gov or 530-224-2176.

Sincerely,

**JENNIFER
MATA**

Digitally signed by
JENNIFER MATA
Date: 2021.03.23
10:03:34 -07'00'

Jennifer Mata
Field Manager

FW: Crystal Creek Aggregate Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/23/2021 8:25 AM

To: Bruce Grove <bgrove@shn-engr.com>

City of Redding scoping comments.

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
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Department Main Line (530)225-5532

From: Toy, Lily <ltoy@cityofredding.org>

Sent: Monday, March 22, 2021 6:52 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Cc: Niemer, Kim <kniemer@cityofredding.org>; Tippin, Barry <btippin@cityofredding.org>; Aukland, Chuck <caukland@cityofredding.org>; Abshier, John <jabshier@cityofredding.org>; Nadin, Shelby <snadin@cityofredding.org>

Subject: Crystal Creek Aggregate Expansion Project

Hello Tara-

I want to take this opportunity, on behalf of the City of Redding, to submit our concerns regarding the Crystal Creek Aggregate Expansion Project. The proposal to install and operate an asphalt plant and permanent concrete recycle area within the existing plant area is of high concern to the City. We are concern with the increase in noise, traffic, air quality, and greenhouse gas emissions. The specifics are as follows:

1. Noise - The location, off of Iron Mountain Road, is about half a mile from our jurisdictional boundary and just a bit over a mile to the Land Park Subdivision, the nearest sensitive receptor located east of the project site. Noise travels a large distance. Hours of operation and the level of noise will impact our City residents. The study should include a noise study component.
2. Traffic - In regards to traffic, this expansion in operations will increase truck activity to and from the plant. Highway 299 will serve as the major connector to Iron Mountain Road. Trucks will either exit Interstate 5 from various exits and connect through the City of Redding streets, N. Market, Buenaventura Boulevard, etc, to connect to Eureka Way to head west to Iron Mountain Road. This will highly impact traffic and our infrastructure. The study should include a traffic study to discuss the impact.
3. Air Quality – The asphalt plant pollutant emissions is of concern. Particulate matter released into the air will be carried by the wind and impact nearby receptors. The study should include an air quality study.
4. Greenhouse Gas Emissions – The greenhouse gas emission from energy used during asphalt processing and process for recycling of asphalt is of concern. Additionally, the increase in truck activity will increase greenhouse gas emissions. The study should address the impacts of the proposed project from greenhouse gas emissions.

Please keep us informed of the project as this moves forward. I appreciate your time and efforts.

Stay healthy and safe-

Lily

Lily Toy, CFM
Planning Manager
ltoy@cityofredding.org
(530) 245-7231



City of Redding

Development Services Department
Planning Division
777 Cypress Avenue
Redding, CA 96001
www.cityofredding.org

City of Redding Facilities have reopened to the public with requirements to wear a mask, maintain at least six feet of social distance, and to refrain from coming into any building if you are not well. Those who are unable to meet the mask requirement will not be served in person, but can conduct business online at www.cityofredding.org, use the drop boxes located outside the facilities or contact City of Redding departments directly by phone at www.cityofredding.org/contacts. Some services may still be limited at this time to ensure the health and safety of the public and City Staff. Thank you.

Confidentiality Notice:

This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

Members of the Public

FW: CCA Asphalt Plant Proposal

Tara Petti <tpetti@co.shasta.ca.us>

Mon 2/22/2021 1:45 PM

To: Bruce Grove <bgrove@shn-engr.com>

Cc: Tara Petti <tpetti@co.shasta.ca.us>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Celeste White
Sent: Monday, February 22, 2021 11:56 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Cc: Leonard Moty <lmoty@co.shasta.ca.us>
Subject: CCA Asphalt Plant Proposal

Dear Ms. Petti,

Despite living approximately a mile away as the crow flies from the CCA quarry, my husband and I received no notice about the CCA's plans to build an asphalt plant in an overwhelmingly residential area. More than one resident has wondered if this oversight was intentional, but be that as it may, here are my objections:

First of all, the utter contempt for their neighbors is appalling, to even consider building something like this where so many people have their homes. This claim by the owner is exceedingly misleading: "The existing quarry is located in an industrial area south of the community of Keswick. Surrounding land uses consist of industrial to the east, industrial to the north and low-density residential to the northeast and southeast, and undeveloped land to the south and west."

The zoning for this particular parcel is an antiquated leftover from times when Redding had a population of 35,000 people and very few people lived outside the city limits. It should, in fact, be rezoned as more and more people make the Keswick area their home. Apart from CCA and the lumber mill, the area is primarily residential. The new Salt Creek Subdivision is very close to this parcel, for example, with high density housing. When this area started developing as a residential location, the only industrial presence was the lumber mill. CCA took advantage of this to broaden the industrial footprint with their quarry. And now they are

attempting to undermine residents' rights and quality of life even more. And as we all know, housing is in very short supply right now in Shasta County.

The applicant neglects to mention that **this area is a popular recreational area as well as residential**, marbled throughout with walking, biking, and mountain biking trails, none of which would be healthy while inhaling fumes from an asphalt plant. This area is just now beginning to recover from the horrific environmental degradation that resulted from the copper smelting operation at the Iron Mountain Mine. The Carr Fire caused a devastating but not insurmountable setback to that recovery. And now CCA wants to put that fragile recovery at even greater risk, and for a net gain to the community of four jobs.

Asphalt production releases arsenic, benzene, formaldehyde and cadmium. Loading the asphalt onto trucks releases volatile organic compounds, polycyclic aromatic hydrocarbons, and very fine condensed particulates, all of which have been linked to an increased risk of cancer. Moreover, how many people who now suffer from lung ailments after the Carr Fire and other smoke events will be negatively affected by their emissions and fumes? **How many people with asthma, COPD, and sensitive airways will be impacted?** Cancer and respiratory problems are not the only health hazard posed by this proposed plant, although they are significant. **Living near an asphalt plant has been linked to central nervous system ailments, liver damage, and high blood pressure.**

How will its toxic products impact the watershed, which includes streams and drainages that feed into the Sacramento River (below the Spring Creek mitigation reservoir), which provides drinking water and agricultural irrigation for millions of people?

How much water, which is already a scarce and increasingly costly resource, going to be required to operate this plant? If it is significant, why should it be allowed to be built here, where residents' water bills are starting to double and triple because of scarcity and periodic drought?

How will the increased truck traffic impact Iron Mtn Rd, which is already in poor condition?

What will be the impact in terms of noise? I understand that the owner proposes to run this plant at all hours.

How will the toxic emissions, increased noise, and light pollution impact local flora and fauna, especially species that are already at risk? The plant would be located close to the Whiskeytown National Recreation Area, which works hard to protect vulnerable species and the health of the ecosystem.

How will all the aesthetic and quality-of-life issues impact the property values of hardworking homeowners who have invested considerable amounts of money and personal labor into their homes and land? A study in North Carolina determined that homeowners lost 56% of their property value when an asphalt plant was built nearby. How far

away will residents be able to smell the noxious fumes of this plant and have to listen to all the industrial noise?

In sum, this proposal seems like a slap in the face to all the people who have put up with all the disruption that CCA has brought into our lives, and a poor reward for tolerating their operation over the years, which benefits practically no one who lives here. An asphalt plant presents *significant* environmental, health, aesthetic, community, and hydrological problems, and I am probably only scratching the surface. I honestly cannot believe that this is even being considered, especially when you think of what this area has been through from the Carr Fire. It borders on sociopathic. I am not speaking for only myself when I say that residents of this area are prepared to pursue every legal and regulatory avenue available to preserve the quality of our lives, homes, and environment.

Sincerely,
Celeste White

FW: Subscribe

Tara Petti <tpetti@co.shasta.ca.us>

Fri 2/19/2021 1:05 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: John Deaton
Sent: Friday, February 19, 2021 11:58 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: RE: Subscribe

Thanks for the explanation. Please include my prior comments for consideration under the current application.
Cheers,
John

Sent from [Mail](#) for Windows 10

From: [Tara Petti](#)
Sent: Friday, February 19, 2021 11:26 AM
To: [John Deaton](#)
Cc: [Tara Petti](#)
Subject: RE: Subscribe

Hi John. Thank you for your inquiry. Your original traffic comments remain applicable to the current application and were included in the November 2019 Scoping Report. All 2019 NOP comments, as applicable, including comments received during the current NOP/scoping period will be considered during development of the Draft EIR. You are welcome to submit new comments as part of this NOP if desired or simply state you wish your prior comments to be considered as part of the current application. Either way, we have your 2019 comments in the administrative record.

Best Regards,

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001

Department Main Line (530)225-5532

From: John Deaton
Sent: Friday, February 19, 2021 11:05 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Subscribe

Thank you for your email this morning. I would like to receive future e-mail notifications about Crystal Creek Aggregate Expansion Project.

Can you advise me if my previous comments regarding potential transportation impacts (i.e., conflicts with bicyclists on Iron Mountain Road) are still on file?

Thank you,
John Deaton

Sent from Mail for Windows 10

RE: CCA asphalt_Robinson_Comments

Tara Petti <tpetti@co.shasta.ca.us>

Tue 2/23/2021 9:02 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Richard Robinson
Sent: Tuesday, February 23, 2021 8:26 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: CCA asphalt

Hi Tara

Reading the environmental report I can't find anything about how many trucks per hour are projected when in full production. Or their routing.

All the trucks going north or east will travel through downtown Redding. That will add a lot to an already busy downtown. Trucks returning from the north will go across Keswick Dam. That is a very narrow road with tight turns both on and off the dam. During the Carr fire clean up they had to post flaggers at both ends.

The intersection into the Salt Creek Heights subdivision is already presenting problems with cars slowing to turn in to the subdivision. No turn lane there.

Is there anything in the plans to mitigate noise, air pollution and light pollution?

Thanks

Richard Robinson

FW: Subscribe

Tara Petti <tpetti@co.shasta.ca.us>

Thu 2/25/2021 4:44 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: shastamermaid819 <shastamermaid819@gmail.com>
Sent: Wednesday, February 24, 2021 7:32 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Subscribe

Thank you

Sent via the Samsung Galaxy S8, an AT&T 5G Evolution capable smartphone

FW: Subscribe. Thanks.

Tara Petti <tpetti@co.shasta.ca.us>

Thu 2/25/2021 4:45 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Terry Healey

Sent: Thursday, February 25, 2021 1:55 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Subscribe. Thanks.

Sent from my iPhone

FW: Yes. I am interested in following development of the EIR for the Crystal Creek Aggregate plant expansion project.

Tara Petti <tpetti@co.shasta.ca.us>

Thu 2/25/2021 4:45 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Terry Healey

Sent: Thursday, February 25, 2021 2:43 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Yes. I am interested in following development of the EIR for the Crystal Creek Aggregate plant expansion project.

Sent from my iPhone

FW: Crystal Creek Aggregate NOP

Tara Petti <tpetti@co.shasta.ca.us>

Thu 2/25/2021 4:46 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: BruceMartha Webbl
Sent: Wednesday, February 24, 2021 10:08 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Re: Crystal Creek Aggregate NOP

Dear Ms Petti-

Would you please provide an electronic copy of the 2019 NOP response letter from Cal DFW referenced in the current Initial Study. I note that it is not reflected in the list of bio resources documents, but is referred to at length in the IS analysis.

Thank you,
Bruce Webb
Co-chair Conservation
Wintu Audubon

FW: Subscribe

Tara Petti <tpetti@co.shasta.ca.us>

Thu 2/25/2021 4:46 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: BruceMartha Webb
Sent: Wednesday, February 24, 2021 10:06 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Re: Subscribe

Please subscribe me to the Crystal Creek Aggregates Expansion Project email notification list.

Bruce Webb
Co-chair Conservation
Wintu Audubon

FW: "Subscribe"

Tara Petti <tpetti@co.shasta.ca.us>

Fri 2/26/2021 4:20 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Cheri Watt

Sent: Thursday, February 25, 2021 8:11 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: "Subscribe"

--

Cheri Watt

FW: Subscribe-Scoping

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/1/2021 7:40 AM

To: Bruce Grove <bgrove@shn-engr.com>

Good morning Bruce. Comment below.

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Michael Berg

Sent: Saturday, February 27, 2021 8:13 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Subscribe

Please keep me advised about the proposed asphalt plant and expanded quarry operations.

I live 2.5 miles from the quarry, and regularly bicycle and hike on the many recreational trails that are within a 1/2 mile radius of the quarry. I am strongly opposed to siting an asphalt plant at the proposed location, due to concerns about toxic pollution that knows no boundaries.

Michael Berg

FW: CCA expansion

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/1/2021 7:47 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Steve Williams
Sent: Saturday, February 27, 2021 9:52 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: CCA expansion

Could you please put me on the list of interested parties regarding emails about this project? Thank you very much.

FW: Crystal Creek Aggregate Expansion Project-Scoping comments

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/1/2021 7:42 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Sandi Wardall

Sent: Saturday, February 27, 2021 12:30 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Crystal Creek Aggregate Expansion Project

The above subject project would result in no vegetation to attenuate the increased noise and dust from more trucks coming and going to the site and the increased use of heavy equipment on the site. In the past, this facility also had night projects using lights that lit up the area like a football stadium. People in and around the area rebuilt their homes after the CARR Fire. The Crystal Creek Aggregate Expansion Project would dramatically reduce property values. Our vote is a BIG NO on this project.
William P & Sandra A Wardall at AP#

Sent from my iPhone

FW: Keswick community asphalt plant HALT

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/1/2021 8:34 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: C F

Sent: Monday, March 1, 2021 8:28 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Keswick community asphalt plant HALT

Good morning,

My name is Christina Conte, I am one of the residents in the Keswick Community who is very concerned for the quality and wellness of our small town.

Let me start off by saying that I moved to the Northstate before the fire. We put every last drop of money to move our entire lives to a small quaint town to start anew. When the Carr Fire hit our community we lost almost everything just like most of those who lived here during that time. Not only have I suffered PTSD and still continue to live each day with the affects of the fire but we continue after several years now to "patch" our lives back together little by little. This has been so hard on our community for so many reasons.

After the fire I was diagnosed with Chronic Asthma/respiratory issues. I see a Doctor regularly and I now have to use one of the strongest medicine inhalers everyday twice a day for the rest of my life. I suffer with shortness of breath and wheezing since the fire, dizzy spells due to trying to catch my breath. This proposed asphalt plant will put my health at risk. I am so frightened that the air quality and fumes will put me in the hospital especially with the high winds that we get out here quite a bit and will blow towards the residents. Unless you have asthma you will never fully understand how scary it is. It feels like you are drowning and trying to catch your breath. I suffer everyday and now I will be forced out of my own neighborhood because of this. I will have no choice but to move if this affects my health.

My other concern is the traffic. We have two ways in and out. This asphalt plant will create more traffic in a very tiny community. I moved here in 2016 with my fiance after leaving his UCLA career after 17 years and my Aerospace career after 10 years. We moved here for the small community feel and no traffic (two of the things that we were really excited about moving). If we would of known about these plans back then we never would of moved here.

This news has me very concerned and that I will have to pick my life up and pick up the pieces once again..Physically, mentally and financially I can't do it. Please understand where I am coming from as well as others in our town. I hope to use my voice to put a stop to these plans for this asphalt plant and live a peaceful life where we continue to patch our lives back together.

Thank you for listening.

Best,
Christina Conte
Keswick Community

Sent from [Outlook](#)

FW: Subscribe

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/1/2021 1:12 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From:

Sent: Monday, March 1, 2021 12:24 PM

Cc: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Subscribe

Tara Petti

I would like to receive e-mail notifications about Crystal Creek Aggregate Expansion Project.

Mark Endraske

Physical
15639 Rock Creek Rd
Redding CA 96003

Mailing
PO Box 289
Shasta CA 96089

FW: Permit regarding Crystal Creek Aggregate Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/1/2021 4:19 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA, 96001
Department Main Line (530)225-5532

From: MNS
Sent: Monday, March 1, 2021 3:31 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Permit regarding Crystal Creek Aggregate Expansion Project

Ms. Tara Petti, Associate Planner

Shasta County Dep. of Resource Management

**Ref: Proposed Asphalt Plant and Concrete
Recycle Area as a part of Crystal Creek
Aggregate facility**

March 1, 2021

Dear Ms. Petti,

I am responding to the open comment portion of the scoping period relative to the above listed project. As a homeowner in Keswick, (my address is 11358 Iron Mtn Rd.) I would like to have my comments considered. Therefore, please consider the following three points:

First: I have prior experience working at an asphalt/concrete redi-mix plant location. While I was in college, during my summer jobs, for three summers I worked at two different plant locations. One was in Stevens Point, Wisconsin, the other in Platteville, Wisconsin. I can tell you that after being in close contact with the asphalt process, that these are very nasty places. To bring the oil to the proper temperature for use in the making of "blacktop" the oil must be heated to a very high temperature. This process produces a considerable amount of "pollution" spewing from the machine and the odor is awful. Depending upon the way the wind blows, I am confident that the entire city of Keswick and the surrounding area will be

forced to smell this awful by-product of the asphalt process.

Second: It is my understanding that there will only be a few new jobs provided by this plant. If there were a larger number of jobs that were being created, well then, maybe it may be that the overall benefit of the plant would help many people from our area. However, since there are so few jobs being created, it seems that the only person to benefit from this plant is the owner, Mr. Jerry Comingdeer.

Third: As you know, the entire area surrounding the Crystal Creek Aggregate operation was burned during the Carr Fire in 2018. The area is currently rebuilding, and it seems to me that the last thing that we need is to force the residents of this area to be subjected to the pollution and stench that will be created by this asphalt plant. It is my feeling that everyone has already suffered enough.

Finally, given the above reasons, I am asking that the Shasta County Department of

**Resource Management please deny the
permit for this plant.**

Thank you for your consideration.

Regards,

Michael Schlosser

Keswick Homeowner

FW: In case you missed it.

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/2/2021 8:17 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Leonard Moty <lmoty@co.shasta.ca.us>
Sent: Monday, March 1, 2021 4:48 PM
To: Susan Kirmayer <skirm958@gmail.com>
Cc: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Re: In case you missed it.

Susan,
Probably, but by way of this email I'm asking that you be added to the list of those receiving notifications on this project going forward. Ms. Petti is the associate planner coordinating information distribution.
Leonard Moty

From: Susan Kirmayer
Sent: Monday, March 1, 2021 12:22 PM
To: Leonard Moty <lmoty@co.shasta.ca.us>
Subject: Fwd: In case you missed it.

We didn't receive a notification - maybe because we're too far away?

----- Forwarded message -----

From: **Lethea Lollar** <lethea@gmail.com>
Date: Sat, Feb 27, 2021 at 10:19 AM
Subject: In case you missed it.
To: Susan Kirmayer <skirm958@gmail.com>

Thought this might be of interest to you. Looks like the plant is almost 2 miles from you.

<https://anewscafe.com/2021/02/26/redding/first-the-carr-fire-now-a-proposed-asphalt-plant-expansion/>

FW: Subscribe

Tara Petti <tpetti@co.shasta.ca.us>

Wed 3/3/2021 8:29 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Tom Thomas

Sent: Wednesday, March 3, 2021 8:20 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Subscribe

Good morning,

Would you please include me on the email list for notifications regarding the proposed Crystal Creek Aggregate expansion project.

Thank you,

Tom Thomas

Sent from my iPhone

FW: Subscribe

Tara Petti <tpetti@co.shasta.ca.us>

Wed 3/3/2021 5:35 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Tom Mac Phee

Sent: Wednesday, March 3, 2021 3:34 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Subscribe

Please include me in any info regarding the CCA project. Thank you.

Tom Mac Phee

Sent from my iPhone

FW: Opposition to the Crystal Creek Aggregate Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/9/2021 12:27 PM

To: Bruce Grove <bgrove@shn-engr.com>

Cc:

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Eric Ohde
Sent: Tuesday, March 9, 2021 11:54 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Opposition to the Crystal Creek Aggregate Asphalt Plant

Tara,

We want to present the following points in opposition to the proposed asphalt plant Crystal Creek Aggregate is proposing. While the need for paving material is there most likely, the location and close proximity to many residents of Keswick, Shasta and west and NW City of Redding is problematic.

Having lived off Lower Springs Rd for 16 years and observing the weather, it should be considered that the evening Westerly wind tends to blow fairly consistently in late spring, summer and early fall when the temperatures are warmer. This will exasubate the spreading particulate matter and sound from this 24 hour operation. This is the same wind that drove the Carr fire into our communities as well.

The greatly increased sound, reduced air quality, increased truck traffic and more light pollution at night all lead us to oppose this plant being located on the current proposed site. Keswick, Shasta and western City of Redding has suffered enough from the Carr fire. Lots of folks are rebuilding and now to have this 24 hr plant in close proximity to all these homes in not a good thing.

The need may be there, but the location is very poor. Please list Sally and Eric Ohde of 16111 Swift Fox Drive xst Lower Springs Rd., Redding, 96001 in opposition to this plant.

Thank you for your time.

Sincerely, Eric and Sally Ohde

Eric and Sally Ohde

16111 Swift Fox Drive

Redding, CA 96001

Bubbles, Bikes and Boards, "life is best when you are living it to it's fullest!"

FW: scoping comments - CCA EIR

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/9/2021 3:17 PM

To: Bruce Grove <bgrove@shn-engr.com>

Cc:

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Karin Lilienbecker
Sent: Tuesday, March 9, 2021 9:01 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: scoping comments - CCA EIR

Dear Ms Petti, please consider the following scoping comments for the CCA EIR:

A. Address truck trips and effects on

1. noise on residences
2. road safety, including bike riders. Given that trucks, OHV traffic (to the BLM recreation area at the end of the road), and large pickup trucks, some with boat trailers going to Keswick boat ramp, make bike riding on the road dangerous under current conditions, consider widening the shoulders to 6 ft between Hwy 299 and the northern-most plant entry or forklift crossing for the cumulative contribution of truck trips from increased plant operations.

B. Address effects on recreation. How are bike riders and OHV users affected by the additional truck trips?

Please add my e-mail address to your distribution list.

Thank you!

Karin Lilienbecker
Redding



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CLICK/?DIALOGUEID=50&SITEID=19&PROFILEID=123246738&URL=HTTPS%3

NEEDS to be ADDRESSED

All pollution, WATER, AIR
 SOIL, wildlife, CONTAMINATION
 of wells AND vegetation

Loss in Property VALUE

RECEIVED

MAR 09 2021

COUNTY OF SHASTA
PERMIT COUNTER

More Than a Nuisance

Features - Feature

Controlling dust at crushing and demolition sites does more than prevent nuisance complaints—it also protects against severe lung diseases.

SUBSCRIBE (/SUBSCRIBE/)

July 26, 2011



Brian Taylor (/author/2590)

Demolition contractors, operators of crushing plants and operators of several types of equipment used in the demolition and recycling process face the challenge of controlling dust.

When working at a jobsite or facility in a residential, commercial or mixed-use neighborhood, the importance of dust control escalates, as the last thing a contractor or sub-contractor wishes to deal with are nuisance complaints from neighbors.

Beyond maintaining good relations with neighbors are important safety and health reasons to suppress dust. Dust obscures the vision of processing equipment operators, mobile material handling vehicle operators and truck drivers, which can lead to accidents.

In regard to health, breathing in dust or particulates of any sort is unwelcome, but when it comes



to the crushing of concrete, the dangers are escalated by the potential of long-term exposure to dust leading to silicosis.

A DREARY SCENARIO

On its website at www.osha.gov (<http://www.osha.gov>), the federal Occupational Safety and Health Administration (OSHA) paints a bleak picture of the potential effects of silicosis.

The agency says silicosis "is caused by exposure to respirable crystalline silica dust" and that "silica is a basic component of soil, sand, granite and most other types of rock and it is used as an abrasive blasting agent."

Another way silica can be present in concrete is when silica fume is added to paving mixtures. Silica fume (also known as micro-silica) "is a byproduct of the reduction of high-purity quartz with coal in electric furnaces in

the production of silicon and ferrosilicon alloys," according to the Federal Highway Administration (FHWA).

Starting in the late 1970s, silica fume as a pavement additive was promoted as an alternative to discharging it into the atmosphere or landfilling it.

Subsequently, silica fume has been used as an ingredient in concrete, most often at a percentage by weight of from 7 to 10 percent of the cement admixture within the concrete. "It has been found that silica fume improves compressive strength, bond strength and abrasion resistance, [plus] reduces permeability, and therefore helps in protecting reinforcing steel from corrosion," says the FHWA website.

But concrete containing silica fume need not be present for a silica dust risk to exist. According to a "Silicosis Fact Sheet for Construction Workers" on the OSHA website, "Most crystalline silica comes in the form of quartz," and "common sand can be as much as 100 percent quartz." Therefore, according to OSHA, since "concrete and masonry products contain quartz in the form of sand, there are many ways to be exposed [to silica] at construction sites."

In all cases where concrete is being smashed or size-reduced,

<p>DRYWALL CONSIDERATIONS</p> <p><i>Large-scale, noisy activities such as demolition work or concrete crushing visibly create dust and particles that are noticeable to employers, workers, neighbors and regulators.</i></p> <p><i>The activities of mixed C&D</i></p>
--

demolition workers and crushing plant operators are breaking down materials with crystalline silica dust as a percentage of the particulate matter in part of the dust created. *issue.*

When a worker's lungs are over-exposed to silica-containing dust, the potential damage is substantial. "Silicosis is a progressive, disabling and often fatal lung disease," OSHA says.

The symptoms of the disease include shortness of breath, possible fever, fatigue, loss of appetite, chest pain, a "dry, nonproductive cough," and ultimately, "respiratory failure, which may eventually lead to death."

Those symptoms can be signals that silicosis is leading to a list of even more serious health disorders, according to OSHA, including:

- Lung cancer (silica has been classified as a human lung carcinogen);
- Bronchitis/chronic obstructive pulmonary disorder;
- Tuberculosis (silicosis makes an individual more susceptible to it);
- Scleroderma, a disease affecting skin, blood vessels, joints and skeletal muscles; and
- Possible renal disease.

The potential of such health problems has caused OSHA to emphasize silica dust control monitoring. In an instruction order found on the OSHA website that went into effect in January of 2008, the agency outlines its "National Emphasis Program - Crystalline Silica."

The instruction order, according to OSHA, "describes policies and procedures for implementing a National Emphasis Program (NEP) to identify and reduce or eliminate the health hazards associated with occupational exposure to crystalline silica."

In the NEP document (which can be found at www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=DIRECTIVES&p_id=3790 (http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=DIRECTIVES&p_id=3790)), regional OSHA offices are asked to identify targeted industry sectors and companies in their regions and then "develop a master list of establishments to be inspected in accordance with OSHA instruction[s]."

SEVERAL OUNCES OF PREVENTION

The risks of breathing dust in general and silica in particular have

recyclers may be less visible and might produce dust in overall smaller amounts, but some dust-related hazards must still be kept in mind.

On its website at www.cdc.gov (<http://www.cdc.gov>), the Centers for Disease Control and Prevention (CDC) has a page pertaining to the hazards of drywall dust. While the site mentions drywall sanding as the source of such dust, when drywall enters a grinder or breaks apart in the sorting process, dust also is produced.

The CDC says workers exposed to the dust from drywall joint compounds "are often exposed to high concentrations of respirable silica." That's because drywall joint compounds "are made from many ingredients (i.e., talc, calcite, mica, gypsum, silica), some of [which] have been associated with varying degrees of eye, nose, throat and respiratory tract irritation. Over time, breathing the dust from drywall joint compounds may cause persistent throat and airway irritation, coughing, phlegm production and breathing difficulties similar to asthma."

been well-known for some time, which has enabled the demolition and recycling industries to take proper steps in response. **Start your FREE one-year subscription to CONSTRUCTION & DEMOLITION RECYCLING to secure our next issue.**

To address the problem, mixed C&D recyclers can turn to nozzle spray or mist systems mounted above or near sorting and processing equipment as well as the fan-style units used at job sites and crushing plants.

In both demolition and concrete crushing applications that most common of compounds— water—can be used to make the critical difference in protecting workers from breathing in too much dust.

At demolition sites, contractors can turn to a variety of equipment suppliers who produce machines that combine specially designed fans and nozzles to direct water droplets to the right places to suppress dust near its source point.

These units, when properly deployed, produce a mist that encapsulates dust particles and lets them drop to the ground before they drift into the cabs of excavators or loaders or to other places where workers are on site.

Dust suppression systems also have become incorporated into the design of many crushing units. Crushing plant operators seeking additional dust suppression capacity can turn to aftermarket suppliers of nozzles that can be mounted to machines. Additionally, they can work with the same suppliers of the fan units that are used at job sites.

In addition to suppressing dust at its sources, workers can be outfitted with personal protection equipment (PPE) to help protect their lungs from dust and particles. Facemasks can be one way of filtering out large-particle droplets. In cases where dust creation is difficult to suppress or particularly heavy, the use of respirators may need to be considered.

Finally, OSHA recommends some very standard hygiene steps for workers that can act as important silicosis prevention steps, including washing their hands and faces before eating or smoking and refraining from eating or smoking in areas where dust is in the air.

Human lungs will always be susceptible to particulates such as silica that don't belong there. But employers can work with equipment suppliers and their workers to help ensure that this unwelcome invasion of the lungs remains minimal.

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CRYSTAL CREEK Aggregate has been NUISANCE to my family AND community since 1990. His DUST, NOISE AND WATER pollution is AND HAS BEEN UNACCEPTABLE. Not to mention TRAFFIC ONE life HAS ALREADY BEEN take due to CCC. How many MORE? Time will tell, Kurt W. Schuehmeier

More Than a Nuisance

NEES to BE ADDRESSsed

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SUBMIT

FW: Crystal Creek Aggregate

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/9/2021 7:56 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Tyler Martin
Sent: Monday, March 8, 2021 11:13 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Aggregate

Hi Tara,

I am closing on a home in River Ridge Terrace. I am deeply concerned about the expansion of the concrete plant. From reading available documents, I was unable to gather an average distance of how far airborne toxins would be dispersed. My home will be less than 4 miles east of this expansion. Is there information on the amount of pollutants that will be landing on homes in the West Redding area? Also, is there an estimate on how this will affect home values in the area? It seems that this expansion will not only increase pollutants into the air (on top of poor air quality during fire season) but increase noise and light pollution to the area. I moved to Redding to be closer to nature, not health hazards. As a new resident to Redding I am very disappointed to see the health and quality of life of my family and friends be impacted by this expansion. I look forward to your response.

-Tyler Martin

FW: Asplalt plant, Keswick

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/9/2021 7:56 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Emma Peel
Sent: Monday, March 8, 2021 11:19 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Asplalt plant, Keswick

After all the destruction from the miners and then the carrfire, why would anyone want to add to it! The land was just starting to look beautiful again. My family moved out that way in 1975. It was so ugly. There were a few scrub oak trees. Little scragley looking Manzanita. The land looked burnt from the toxic waste from Iron Mt. Mine. Then the carrfire. They need to find another spot for there business. The mountains are full of places to mine. Give it a rest!

FW: Crystal Creek Aggregate Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/9/2021 7:55 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Ronald Reece
Sent: Tuesday, March 9, 2021 7:33 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Cc: Ronald Reece <rerece@snowcrest.net>
Subject: Crystal Creek Aggregate Expansion Project

March 8, 2021

Ms. Tara Petti, Associate Planner
Shasta County Department of Resource Management, Planning Division
1855 Placer Street, Suite 103, Redding, CA 96001

Regarding: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001).

Dear Ms. Petti:

The proposed Crystal Creek Aggregate and Asphalt Production Plant Expansion will have a significant negative impact on the health of our citizens and the environment in West Redding. Crystal Creek Aggregate with the new asphalt production plant is a stone's throw from the Sacramento River, Middle Creek, Rock Creek, Whiskeytown Lake and Shasta Union Elementary School.

Shasta County already has a Superfund project, off of Iron Mountain Road, that struggles to contain the hazardous material from previous misguided mining operations.

West Redding has recently endured the Carr Fire in 2018 with hundreds of homes destroyed and where thousands of acres are still charred. It will take a decade to recover from such devastation with the rebuilding of new homes and community restoration. An expanded aggregate and asphalt product plant in West Redding will significantly reduce the value of those efforts and diminish the quality-of-life Shasta County and the City of Redding is promoting.

Doubling the size of Crystal Creek Aggregate will bring new noise, dust and smell pollution from regular blasting, an expanded flow of big rig trucks and the enhanced aggregate operations that will blanket West Redding.

Adding an asphalt production plant will expose our rivers, environment, local schools, drinking water and families to sulfur dioxide, arsenic, benzene, formaldehyde, cadmium, hexane, phenol, toluene, lead, mercury, volatile organic compounds, polycyclic aromatic hydrocarbons, and fine particulates. These are known causes of cancer, lung disease, liver damage, central nervous system disorders, high blood pressure, sinus problems, headaches, dizziness and nausea, to name a few.

Efforts to mitigate or lessen these hazards are widely known to be superficial still exposing West Redding and Shasta County environment and citizens to the above hazards for decades to come.

Please reject this proposed expansion.

Best regards,

Ron Reece, MD
2701 Old Eureka Way Suite 2A
Redding, Ca 96001

FW: Crystal Creek Aggregate Quarry

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/9/2021 7:54 AM

To: Bruce Grove <bgrove@shn-engr.com>

Cc:

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Mary

Sent: Tuesday, March 9, 2021 7:43 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Crystal Creek Aggregate Quarry

Dear Tara,

I am writing to express my opposition to the construction of an asphalt plant at Crystal Creek aggregate quarry. As someone who has lived in Redding for 50 years and enjoyed living and recreating in West Redding for the past 30 years, I vehemently oppose this project which threatens the joys of the natural environment enjoyed by bicyclists and hikers. This proposal threatens the headway we have made building West Redding's glorious trail system. The trails have already been severely impacted by the Carr fire. Allowing the asphalt plant proposal to go forward is the death knell for outdoor recreation in the area.

Mary Speigle

3768 Sunday Ct.

Redding

Sent from my iPad

FW: Crystal Creek Aggregate

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/11/2021 7:31 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Patrick Graham

Sent: Wednesday, March 10, 2021 6:36 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Crystal Creek Aggregate

Good evening,

My name is Patrick Graham and my wife and I live at 15417 Rock Creek Road in Old Shasta. I became aware of this proposed asphalt project last year and I have been keeping an eye on the project. I am opposed to this project for several reasons but I will only talk about two; smell and traffic.

I am deathly afraid of a estimated 1000 trucks a day entering 299 where there is a passing lane west bound. I travel it daily and the accidents and near misses are a daily occurrence. With all the big rigs trying to cross traffic (they certainly can't be routed across Keswick Dam, can they???) somebody will be killed.

As to the smell, The County certainly can't guarantee that the smell of tar will not be all over the entire community of Shasta and Keswick. Industry is not why we move to rural Shasta County. We might as well live in Richmond next to the Chevron Refinery.

I urge the County to turn down this proposal and save Old Shasta.

Thank you.

Patrick and LouAnn Graham

Sent from my iPad

FW: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19- 0007) and (RP 19-0001)

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/11/2021 7:32 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: don karnett

Sent: Tuesday, March 9, 2021 7:17 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19- 0007) and (RP 19-0001)

Dear Ms Petti,

I wish to voice my concerns against this project. We are still trying to recover from the Carr Fire and now you wish to put in an asphalt plant in our backyards? That is just cold and cruel to even suggest!

My neighbors don't even know about this so how will you get any scoping comment feedback on this subject? You have not made this project well known to the public.

T.M. Arnett

FW: Crystal Creek Aggregate proposed Asphalt Plant...

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/11/2021 7:33 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Don Barich
Sent: Wednesday, March 10, 2021 2:54 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Aggregate proposed Asphalt Plant...

Dear Tara,

I am writing to voice my opposition to the proposed Crystal Creek Aggregate Asphalt Plant on Iron Mountain Road.

An operation such as that will be a major air polluter emitting noxious and potentially toxic fumes into the atmosphere that will be carried to all parts of the county by prevailing winds.

Asphalt fumes are also known to cause, and worsen respiratory ailments as well as other health issues including cancer, liver damage, and neurological problems.

This proposed plant is not good for the health of the residents of Shasta County and will impair their quality of life with noxious and cancerous fumes.

Sincerely,

Don Barich

FW: YES....on Crystal Creek Expansion

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/11/2021 3:04 PM

To: Bruce Grove <bgrove@shn-engr.com>

Cc:

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Susan Taylor

Sent: Thursday, March 11, 2021 3:01 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: YES....on Crystal Creek Expansion

We'd like to voice our thoughts on Crystal Creek expanding to include asphalt. As Redding continues to grow; this plant is necessary. As the crow flies we are about 1-2 miles from project; so we do consider it in our backyard. Iron Mountain Rd is the PERFECT location for this plant....there is already a mix of industries besides the very toxic Iron Mountain Mine.

Please count our votes as a very enthusiastic YES for the expansion to come to fruition.

Thomas and Susan Taylor

4013 Acadia Place

Redding

Sent from my iPad

FW: Proposed CCA Asphalt Plant - West Redding

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/11/2021 3:04 PM

To: Bruce Grove <bgrove@shn-engr.com>

Cc:

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Crystal Stewart
Sent: Thursday, March 11, 2021 2:54 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Proposed CCA Asphalt Plant - West Redding

Hello,

I am writing in regards to the proposed Crystal Creek Aggregate asphalt plant.

I am against the CCA Asphalt Plant.

My concerns are as follows –

1. Pollution – noise, Air and Land –
 - a. Increase to traffic and extended working hours create an influx of noise
 - b. Fumes from the plant and vehicles create an increase to air pollution
 - c. This plant would be next to various water ways
2. Neighboring Properties –
 - a. Decrease to house values
 - b. Increase to wear and tear to road ways used by everyone
3. Phu – Rus – Tapi – Wintu Resting place
 - a. This is a protected area located directly next to the current CCA land
 - b. Per public Law 95-341 and 96-95 and the California health and safety code sections 7052, 7500, 8101 and 8102 Prohibit disturbing these sacred ground
 - c. This area was burned but is still protected under federal and state laws

Thank you for your consideration,



Crystal Stewart
Alpine Back Office Services
LinkUs Entreprises, LLC

FW: Crystal Creek Asphalt Plant online conference

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 10:22 AM

To: Bruce Grove <bgrove@shn-engr.com>

Cc:

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Roy Berlinghoff
Sent: Tuesday, March 9, 2021 12:16 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Asphalt Plant online conference

Hello Tara,

You asked that I contact you for follow up in regard to my questions about emission data being self reported in regard to the current rock quarry and the planned expansion/addition of an asphalt plant. You mentioned that you were going to research this and other information and get back to me. My contact info follows below.

Thank you,
Roy Berlinghoff
RRTSCB@yahoo.com
16290 Laurie Ann Ln.
Redding, CA 96001
(323)719-5423 (voice or text)

RE: Crystal Creek

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 10:28 AM

To: Jack Baker

Cc: Tara Petti <tpetti@co.shasta.ca.us>

Thank you for your comments Jack. Please see the Initial Study link on the Resource Management Website for details on the project. There is a project description in the first few pages.

https://www.co.shasta.ca.us/docs/libraries/resource-management-docs/eir/crystal-creek-aggregate/2021-documents-for-recirculation/cca_initial-study_february-2021.pdf?sfvrsn=d3dcf489_2

Best Regards,

Tara Petti

Associate Planner

Shasta County Department of Resource Management

Planning Division

1855 Placer Street Suite 103

Redding, CA. 96001

Department Main Line (530)225-5532

From: Jack Baker

Sent: Tuesday, March 9, 2021 4:17 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Cc: Jack Baker <wjbaker@wjbinc.net>

Subject: Crystal Creek

Dear MS,

Please forward to me a description of the proposal for an annual tonnage expansion and an addition of an asphalt plant as I would like to comment in support of the project. I believe, for example, that the addition of an asphalt plant at this location would save many miles of transporting asphalt concrete from Clear Creek Road north through Redding and then west toward Trinity County for projects in that area. Saving both diesel fuel and green house gasses.

Thanks,

Jack Baker

FW: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19- 0007) and (RP 19-0001)

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 10:31 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: don karnett

Sent: Tuesday, March 9, 2021 7:23 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19- 0007) and (RP 19-0001)

Dear Ms Petti

My husband and I purchased land before the Carr Fire to retire in West Redding and now there are plans for an Asphalt Plant basically in our backyard. This would impact our health in our senior years. My husband suffers from severe allergies. How do we protest this?

Sincerely
Twila Arnett

FW: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19- 0007) and (RP 19-0001)

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 10:32 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: don karnett
Sent: Tuesday, March 9, 2021 7:52 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19- 0007) and (RP 19-0001)

We have purchased land within a few miles of the Crystal Creek Aggregate Company and we wanted to retire here with a beautiful view of Mt Shasta from our back deck but this asphalt plant would destroy that wonderful view and causing our land value to drop. We have already seen decreased land value after the Carr Fire.

I love wildlife and the wildlife is just starting to return after the Carr Fire. I have just started hearing frogs at night after two years after the Fire. I see more and more birds returning each season. An asphalt plant would not only be harmful for humans but also for the wildlife that is struggling to return.

FW: Asphalt Plant in Redding

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 10:32 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Monica Uchitel

Sent: Wednesday, March 10, 2021 7:29 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Asphalt Plant in Redding

Ms. Petti

Stop the TOXIC asphalt plant in Redding!

Thank you kindly in advance,
Monica Cerimele

20210315

Attn: Tara Petti: Associate Planner tpetti@co.shasta.ca.us 530-225-5532

Shasta County Department of Resource Management
Planning Division
1855 Placer St., Suite 103
Redding, CA 96001

RE: Crystal Creek Aggregate

Dear Tara,

I want to voice my concerns over a planned expansion of the Crystal Creek Aggregate plant on Iron Mountain Road.

As a building contractor I know firsthand that "building standards" are a "minimum standard". I am concerned that this project will be graded using standards based on "acceptable risk" which assumes the plant operates perfectly and the owners can be trusted to operate on an honor system. It is a jump of faith to assume that the "theoretical" air emissions predicted by computer models and used by plant owners accurately reflect air emission from the plants daily operations. Safety to the community should be first and foremost and even a small asphalt plant can produce tons of toxic fugitive emissions into the air not to mention the formaldehyde, hexane, phenol, polycyclic organic matter, and toluene.

As a new resident to Redding CA living 2.5 miles downwind from this plant I oppose this planned increase in operations.

Robert Gordon

FW: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19- 0007) and (RP 19-0001)

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 11:55 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: don karnett

Sent: Thursday, March 11, 2021 9:20 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Re: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19- 0007) and (RP 19-0001)

I live just south of Crystal Creek Aggregate Plant and this plant started using HUGE lights at night that flood light into my house all night. This would just get worse with the installation of the Asphalt plant. They were up to approx 8 of these huge movable light sets at the end of the year but now they are using less. They have no shields pointing the light down so this light pollution goes everywhere. This has been known to affect migration of birds and have all sorts of negative side effects, like not allowing me a good night sleep. I cannot view the stars at night when these lights are turned on. This was one BIG reasons for us purchasing this land. Please do not allow this project to continue.

Dark Skies can give you more negative effects of this type of light pollution.

Twila Arnett

On Thu, Mar 11, 2021 at 9:09 AM don karnett <kraightm@gmail.com> wrote:

| What action can I take to protest again

FW: Crystal Creek Expansion Project UP 19-0007 and RP 19-0001

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 11:38 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001.
Department Main Line (530)225-5532

From: Jim Cowee
Sent: Wednesday, March 10, 2021 7:45 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Expansion Project UP 19-0007 and RP 19-0001

We lived on Laurie Ann Lane from 1984 until burned out by the Carr Fire in 2018. As former homeowners and residents we feel an obligation to both the residents living in proximity to Crystal Creek Aggregate and to the hundreds if not thousands of hikers and bicyclists that recreate on the lands and roads surrounding Crystal Creek Aggregate, to speak out on one of the many issues that affected us.

The Use Permits and subsequent Amendments approved by Shasta County for Crystal Creek Aggregate invariably contained mitigations designed to reduce if not eliminate the negative environmental impacts of a gravel quarry operation surrounded by residences and recreational land. On paper those mitigations really looked good but in actual practice were often found to be without substance because the County failed to provide proper oversight and enforcement. Neighbors were forced to become watchdogs because the County lacked adequate staffing to do its job. Many hours were spent by neighbors documenting on videotape dangerous truck traffic conditions, near misses of bicyclists on Iron Mountain Road by trucks, dust clouds blowing all over the area and muddy runoff polluting Middle and Rock Creeks. Noise pollution was documented using decibel meters and photographs were taken of things not approved to be stored on the premises. The County, even with all the documentation provided by the residents, frequently did not act in a timely manner and when it did react, it seemed to us to be with great reluctance. To our knowledge Crystal Creek Aggregate was never penalized for any permit violations.

We do not have firsthand knowledge today of what the County does to enforce Crystal Creek Aggregate's Use Permit conditions but have been told by current residents on Laurie Ann Lane that not much has changed. Based on past performance, or lack of performance, it is hard to imagine that the County's oversight of Crystal Creek Aggregate

and enforcement of its Use Permit requirements would be improved by the addition of an asphalt batch plant operating 24 hours daily with its own set of environmental impact mitigations. Any change or amendments to Crystal Creek Aggregate Use Permits should hold the County's "feet to the fire" with more stringent oversight and enforcement requirements.

James F Cowee
Carol B Cowee
1972 Balzac Ct
Redding, CA 96003

FW: Concerns: Crystal Creek Aggregate Expansion

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 12:13 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Patty Soares
Sent: Friday, March 12, 2021 12:14 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Concerns: Crystal Creek Aggregate Expansion

Hello Ms. Petti,

I first saw an article about the proposed expansion of the Crystal Creek Aggregate company on March 10th, so I was not aware of the meeting on March 9th; I read the three related documents on the Shasta County Resource Management website:

<https://www.co.shasta.ca.us/index/drm/planning/eir/crystal-creek-aggregate>; and I have several concerns about the proposed expansion

My primary concern is for the health and safety (air & water quality and noise) of all the children attending Shasta Elementary and the families that live in the vicinity of the Crystal Creek Aggregate company. And as *one* business increases its profits, is it fair for the many homeowners whose values will likely plummet as a result?

My other concern: as smog and pollutants are trapped here in the North State, and with increased warming temperatures, how can we consider allowing a company to proceed in the manner it proposes?

Shouldn't this type of project (including the proposed asphalt processing plant) be established in a very remote area far from households and an elementary school? And if this proposal is approved, how does that make a case against other pollutant-producing industrial companies from expanding or starting up? It is poor planning for Shasta County moving forward and does not positively impact our area since the Crystal Creek Aggregate company employs so few people.

I've lived in Redding since 1964 and have seen this community grow in significant ways. I'm particularly impressed with efforts to attract more tourism and clean businesses, not manufacturers that contaminate our environment and plan to do so at least until the turn of the century.

According to the "Revised Notice of Preparation" Shasta County is currently preparing an Environmental Impact Report for this expansion project. When will the report be posted publicly and will there be another meeting for the public to express their concerns?

Thank you,
Patricia Soares

FW: Crystal Creek Aggregate proposal

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 12:21 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: E Judge
Sent: Thursday, March 11, 2021 4:07 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Aggregate proposal

Dear Ms. Petti,

I would like to express my deepest concerns over the proposal by Crystal Creek Aggregate to build an asphalt plant on Iron Mountain Road, near Keswick.

The fumes that the plant will put out, alone, is concerning, as fumes will not stay just above the plant but will move in whatever direction the wind blows; if that wind is strong, those fumes will reach over most of the county, blowing particulates that will endanger everyone, not solely people with health conditions. It will create even more health problems.

The impact of over a thousand trucks per day going in and out of the area, on a narrow road, and creating traffic at the intersection of Iron Mountain Road and Highway 299 West is just too much for the area to handle. I, as a westside homeowner, do not want to see the value of my property, or my neighbors' properties, decrease because of this one company's desire to slice into the land more than it already has.

I hope you will hear this one voice on this matter. I hope you will act to not let this proposal go through. Thank you for your time.

Sincerely,
E. Judge

FW: Crystal Creek Aggregate project

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 12:23 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Margaret Jensen

Sent: Saturday, March 13, 2021 9:51 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Crystal Creek Aggregate project

Ms. Petti—

As someone who lives in Shingletown but regularly visits friends, bikes, and travels for work in the parts of the county that would be directly affected by the proposed CC Aggregate project, I want to protest it! The noxious emissions, dust, and truly ridiculous traffic impacts are all reasons to deny a permit. I understand that existing asphalt producers in the county are working below capacity—and are located in industrial areas with much less impact on surrounding neighborhoods. Frankly, the idea of inflicting this on the homeowners and residents of that area, so many of whom remain traumatized by the Carr Fire, makes me sick.

Thank you for taking these comments into consideration.

Sent from my iPhone

FW: Proposed asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 12:29 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Victoria Bernet
Sent: Sunday, March 14, 2021 10:57 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Proposed asphalt plant

I am a homeowner on Highland Circle and I oppose the asphalt plant. This plant will bring air pollution, noise at all hours of the day and night, increased traffic, and property values will drop. We live down wind of the existing aggregate plant and have a view of it, I don't want to breathe the toxins asphalt will produce. My husband and I are avid bicyclists on the River trail and will be impacted by the increased truck traffic on Iron Mountain Rd and the toxic smell it produces. Please allow our community to rebuild and grow, there is no place for an asphalt plant when it is surrounded by residential growth and recreational river trails.

Sincerely, Victoria Bernet
15785 Highland Cir, Redding, CA 96001

FW: Recreation study for CCA

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 1:46 PM

To: Bruce Grove <bgrove@shn-engr.com>

Cc:

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Richard Robinson
Sent: Monday, March 15, 2021 1:38 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Cc: Leonard Moty <lmoty@co.shasta.ca.us>
Subject: Recreation study for CCA

Hi Tara

I see there is no stand alone study for recreation in the EIR for the Crystal Creek Aggregate asphalt plant. With 5 trails including the main River trail less that 1 mile from the plant and all very affected by the plant emissions and truck traffic recreation deserves a separate study.

Plus fishing on the river and the whole Swasey recreation trail area will be affected by the emissions.

Thanks Richard Robinson

Jim Dowling
11327 Tanstaaf Ln
Redding, CA 96001

3/15/2021

mail: PO Box 756
Shasta, CA 96087
email:

Dear Ms Petti

My name is Jim Dowling and I live close enough to the proposed asphalt plant to have received a notice. (That's fairly close.)

Based on what I've been able to learn about the production of asphalt and available details about the proposed plant, here are my main issues somewhat prioritized by level of concern:

***Health** - It is well documented that the chemicals that go into production of asphalt are dangerous. They contain carcinogens, substances that cause respiratory problems and more. The fumes are not only noxious, but also carry dangerous chemicals. They cannot all be contained during the production, storage and transporting of asphalt. Prevailing winds will undoubtedly carry these chemical laden fumes far from the facility, all to the detriment of people and the environment.

***Light and Noise Pollution** - The asphalt plant would run 24 hours a day, 6 days a week. Quarry operations would increase significantly. That's a lot of blasting, sounds of diesel trucks, ambient production sounds, etc. The facility will require a lot of nighttime lighting. These two factors alone significantly erode quality of life for anyone living close by.

***Streams** - The health of Middle Creek is jeopardized by both existing and proposed changes to Crystal Creek Aggregate. Middle Creek is a spawning ground for both salmon and steelhead. Folks living close to the creek have long complained of muddy run-off straight from the existing plant entering Middle Creek. Both mitigation efforts and County oversight are currently inadequate. Adding an asphalt plant will only exacerbate these problems.

***Trucks and Traffic** - The proposed plant accommodates over 1,000 trucks a day (and night). That's a lot of wear and tear on roads that could use some TLC right now. That's a lot of diesel fumes and a lot of noise. It's also a lot of truck traffic that can not avoid populated areas before reaching Interstate 5. Where are they going to park (and idle) as they wait to take on loads?

***Recreation** - The French Fry Trail runs close behind my house. It is very popular and regularly visited by hikers and bikers, both local and visiting from out of town. More and more all the time. Trailheads are packed with cars on weekends. The French Fry and others that run close to the plant stand to suffer with an asphalt plant. Isn't the appeal of these trails all about health and exercise? This begs another issue. What is our future vision for west Redding. Recreation or industry? Or both with careful planning and oversight. Decisions made now will determine the overall character of this area for generations to come.

Finally, as someone who has chosen to stay and rebuild following the Carr Fire, I am beyond concerned about **general quality of life**, affected **property values** and whether our decision to start anew at this location was a wise decision. We came out here thirty years ago, west of Redding, for it's beauty, proximity to nature, the solitude of rural life. We feel it's a resource worth preserving for all of us, locals and visitors alike. So, I'll leave you with this question: Isn't there a more suitable location for an asphalt plant?

Sincerely, Jim and Donna Dowling

**441 Naismith Blvd
Eugene, OR 97404**

March 10, 2021

Ms. Tara Petti, Associate Planner
Shasta County Department of Resource Management Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001

Dear Ms. Petti

From 1998 until our house was destroyed in the 2018 Carr Fire, we lived on Rock Creek Road near the Tanstaaf Lane intersection. It was a quiet rustic area, with one exception: often we would be annoyed by the noise of heavy machinery operating at Clear Creek Aggregate almost a mile to the south of us. While we chose to relocate rather than rebuild, we still own the property and of course we are concerned about how the proposed asphalt plant and expansion of operations at the quarry will effect the value of our land.

I understand that the Environmental Impact Report has not yet been issued but I am interested in how it will treat two elements in the design. In addition to the anticipated increased noise level, I am particularly concerned about how hazardous air pollutants will be controlled, especially polycyclic aromatic hydrocarbons and oxides of sulfur and nitrogen. These toxic pollutants will inevitably be emitted from the dryer mixer and loading facilities and can travel far in the air and injure the health of nearby residents and hikers on the French Fry Trail and Trail 58. I hope and expect that the EIR will address this aspect of the design and that the county will insist on best practices mitigation.

Thank you for your attention.

Regards


Marion & Carole Schmitz

RECEIVED

MAR 15 2021

**COUNTY OF SHASTA
PERMIT COUNTER**

March 7, 2021

Shasta County Dept of Resource Management

Planning Division

1855 Placer Street

Redding, Ca.96001

Attention: Tara Patti, Associate Planner

Ref: Proposed Asphalt Plant

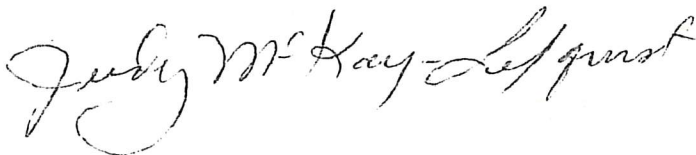
I currently have property right across from CCA. I have lived there since 1997.

After the devastating fire in 2018 I chose to rebuild rather than sell the property. If I had known about the plans of an asphalt plant, I would have sold. If this goes through my property value will be half of what it's worth today. I spoke with the county assessor's office about it and they said "if it goes through I could put in for my property to be re-assessed due to the lowering of property values".

Who, in their right minds would want to live across the street from an Asphalt plant?

I have put up with dust, dirt, trucks and noise since living there but this proposed plant is more than I can take. Unfortunately, the fire removed all the buffer vegetation between the quarry and my property, which makes it even worse. My son (who currently lives on the property), has Asmethia. Any extra pollinates generated from the plant will just cause more stress to his health. I am currently living with my sister out of town but plan to return in the near future and don't want to expose myself (a senior) to this environment. I love my property and would like it to remain as a peaceful area to live in without added threats to my sons and my health. Please take my words under consideration. I can't stress how important it is **NOT** to have this Asphalt plant approved.

Sincerely Judy McKay-Lifquist



RECEIVED

MAR 15 2021

**COUNTY OF SHASTA
PERMIT COUNTER**

Keswick Resident's Concerns with the Crystal Creek Aggregate Expansion Project

To Whom It May Concern:

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics:

The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation.

The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night. The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality:

Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen².

There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few.

¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005

² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110

RECEIVED

MAR 15 2021

COUNTY OF SHASTA
PERMIT COUNTER

People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move.

Biological Resources:

The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts to California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources.

See additional biological resource concerns in the Hydrology and Water Quality section.

Energy:

Local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like manzanita and oak, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire.

Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials:

See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality:

The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter.

The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property.

The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few un-dammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the

Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³.

Land Use and Planning:

While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise:

Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest.

With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill.

While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation:

The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this

³ 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021

⁴ Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020

part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come too, primarily to get into the woods and enjoy the fresh air.

Transportation:

The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry.

The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue.

Wildfire:

The local community has concerns about the new asphalt plans impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories:

The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes

⁵ Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020

4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶.

In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion:

The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry.

The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,
The Local Keswick Community

Name Emily Celeste White

Signed Emily Celeste White

Date 3/12/21

⁶ Per conversations with Northstate and J.F. Shay asphalt plant operators, February 26th 2021

FW: Asphalt Plant on Iron Mountain Rd.

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 2:59 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Kate Jewett
Sent: Monday, March 15, 2021 2:52 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Asphalt Plant on Iron Mountain Rd.

To whom it may concern,

I am protesting the proposed asphalt plant on Iron Mountain Road. I have lived in "Old Shasta" for over 20 years. I settled here because I liked the old nostalgic town. I like the wild flowers in the spring, the fresh air and country feel. I hike French Fry Trail as it is my backyard. For years my family has enjoyed Whiskeytown lake and now my grandbabies do too. I bought the home I live in because I love to sit out on my patio and look at the city lights and listen to the frogs. I am an avid nature lover. I spend my money and my time on landscaping my property.

The Carr fire destroyed all of it. I lost almost 3 acres of 60 to 80 year old ponderosa pines. I felt like I lived at Lasson when I sat next to our warming fire pit we dug. In one night it was all wiped away. We struggled, like the rest of the people living out here, to recover. We too mourned the loss and decided to stay and replant. We just recently learned that our water bill will double in a few years. This was disheartening as we no longer have any shade out here and our newly planted trees take a lot of water compared to the indigenous pine we used to have. The price of wood has also doubled. Our air conditioning bill is more now too, as we no longer have the shade we used to. I would consider selling except, I am in the middle of a property swap and I am having a garage built as I write this. I have only a few years left to pay on my house and hope to retire at about the same time.

Hearing that one person can make a decision (like putting in an asphalt plant) that affects so many people's lives, shocked me. How does that one person have the right to ruin so many lives? I felt as though there had been a death when I lost all of my ponderosas. I was deeply affected and my property will never be the same in my lifetime. Now hearing that I will come home at night to the loud sounds and smells of an asphalt plant absolutely crushes me. I will be looking out at not only a burnt terrain, but an ugly stinking, loud factory as well. It is like a nightmare that won't stop. My property value will plummet, traffic will be loud and increased, and our environment polluted. Do you really want this 5 miles from Whiskeytown Lake? The Westside is loved by many for its bike trails and nature. We have an opportunity to make this area nice, instead of having an ugly blob on the outskirts of town that no one really cares about. Over by Grant School, the dead trees were removed **LAST** spring. It is as if we have been forgotten here, like the ghost town on our main street. People had

signs and bumper stickers after the Carr fire that read, "We will rebuild." Please help us to do that. Please remember us and all that we have been through, and are going through now, and vote this proposal for an asphalt factory down.

Sincerely,

Kate Jewett
Rock Creek Rd.

[Asphalt Plant objection](#)

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FW: CCA Comments

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 3:18 PM

To: Bruce Grove <bgrove@shn-engr.com>

Cc:

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Laurie Phillips
Sent: Monday, March 15, 2021 11:15 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject:

Regarding that asphalt plant proposed to be built on iron mountain road objective to this this will increase the amount of big rigs going up and down iron mountain road as now it's really dangerous the amount we get now as these trucks are cutting corners and go awful fast this does not include the asphalt spilled and the debris that will be scattered along iron mountain road this is highly dangerous as it is we have forklift warnings going back and forth also the pollution the asphalt plant puts in the air it is cancerous

FW: Scoping Comments for Crystal Creek Aggregate Proposal

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/15/2021 3:30 PM

To: Bruce Grove <bgrove@shn-engr.com>

Cc:

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Richard Hardie

Sent: Monday, March 15, 2021 3:26 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Cc: Leonard Moty <lmoty@co.shasta.ca.us>; Shasta County BOS <shastacountybos@co.shasta.ca.us>

Subject: Scoping Comments for Crystal Creek Aggregate Proposal

Dear Ms. Petti,

Below please find my objections to and concerns about the asphalt plant and gravel quarry expansion proposed by Crystal Creek Aggregate.

Because of the length of my remarks, I will hand-deliver a print-out to your office this week for ease of reading; but I thought it might be easier for you to enter my comments in your system if I also submitted them electronically.

• **Air pollution from asphalt plant operations**

I am deeply concerned about the amount of air pollution that would derive from an asphalt plant that is surrounded by residential areas as discussed below:

From *Asphalt: The Magazine of the Asphalt Industry*:

Heated asphalt produces hydrogen sulfide gas. “H₂S is a gas at typical storage temperatures, and it has a tendency to migrate from the liquid phase into the vapor phase above the oil. The foremost consideration when dealing with hydrocarbons containing large amounts of H₂S is safety of personnel involved in its storage, handling and transportation – and for the safety of the community. H₂S is a known workplace hazard in a variety of environments.”

Given that a number of households are located 300 yards or less from the proposed asphalt plant, as evidenced by the number of notifications that the county planning dept sent out, these individuals could be subjected to the same hazards as those who work the plant, especially during the summer when temperatures are now routinely above 100° F and during the well-documented inversions that our horseshoe-shaped valley experiences.

From the California State Insurance Compensation Fund:

“Asphalt is often mixed with solvents (diesel, kerosene, naphtha, toluene, and xylene), binders, hardening and bonding agents (resins), crushed rock, sand, and recycled rubber. **Exposure to asphalt fumes can cause serious health effects ... When asphalt is heated, the fumes can cause coughing, a scratchy throat, or lung irritation. Long-term exposure can lead to bronchitis or emphysema. Asphalt additives may create vapors that can cause damage to the liver, kidneys, and nervous system. Hot asphalt can release hydrogen sulfide gas (H₂S) that can cause lung irritation, suffocation, or death ... Heated asphalt is a fire and explosion hazard.**”

As noted above, our summer temperatures routinely rise above 100° F and have reached as high as 119°. One recent summer had only three days where the high did not get above 100° F, and we experience several high pressure inversions every year where air pollution and smoke get trapped in the valley.

From the Electronic Library of Construction Occupational Safety & Health:

“Asphalt is originally solid or semisolid. It is blended or “cut” with a solvent to make it more liquid. Hazardous solvents may be used, like naphtha, toluene, and xylene. Many other chemicals are used in asphalt products—binders, hardening agents, bonding agents, crushed rock, and sand. For example, a product might contain styrene, a toxic chemical that causes nervous system damage, as well as asbestos and silica in the rock and sand. Their dusts can cause lung disease.”

Asphalt production releases arsenic, benzene, formaldehyde, cadmium, and chromium. Loading the asphalt onto trucks releases volatile organic compounds, polycyclic aromatic hydrocarbons, and very fine condensed particulates. All of these chemicals have been linked to an increased risk of cancer. Living near an asphalt plant has been linked to respiratory disease, central nervous system ailments, liver damage, and high blood pressure. A number of residents suffered lung damage after the Carr Fire and other smoke events. How many people with asthma, COPD, and lung damage, and sensitive airways would be impacted and how seriously?

In addition, individuals living within 300 yards of the proposed site are currently undergoing treatment for cancer. The close presence of an asphalt plant represents a grave danger to them. I personally suffered serious lung damage while evacuating from the Carr Fire, which required medical treatment. Smoke events since then have exacerbated those health issues. I also suffer from stage 3 kidney failure from hard-to-treat hypertension; both conditions could

be worsened by an asphalt plant located less than a mile away from my home. Children, too, suffer an outsized effect from various forms of pollution.

Human health is not the only concern. There is environmental damage to consider as well. For example, **when hydrogen sulfide mixes with rain, it becomes acid rain.** Acid rain from hydrogen sulfide is what devastated an area within a fifty-mile radius of the Iron Mtn copper smelter in the late 19th and early 20th centuries. In the early 1980s, a federal Superfund site was set up to deal with the extreme environmental damage. Until 1940, the vegetation within this radius had all died, the topsoil washed away, and the area became sterile badlands for decades.

Taxpayers have invested billions of dollars in the clean-up from the smelter and the area was recovering nicely from the effects of that pollution. The Carr Fire was a setback, but again, the area is recovering and it is essential that we get as much vegetation growing back as possible to take as much carbon dioxide out of the air as possible in order to mitigate climate change going forward. It should be noted that the new “mega wildfires,” of which the Carr Fire was one of the first, have been directly attributed to climate change by scientific experts. In our area, climate change takes the form of longer and hotter dry seasons and shorter and drier wet seasons, setting up the conditions for mega wildfires.

- **Air pollution from storing, loading and transport of asphalt (“fugitive emissions”)**

“Fugitive emissions” are a well-known hazard of asphalt production, which derive from the storing, loading and transport of asphalt. It is my understanding that the asphalt trucks taking asphalt from the plant would not be covered. Fugitive emissions represent all the same hazards to the air quality that emissions not scrubbed by the stacks would be.

- **Water pollution from asphalt plant operations**

CCA sits between two creeks, Middle Creek and Rock Creek. It is surrounded as well by numerous seasonal drainages. If the stacks are well-designed, emissions can be mitigated, but fugitive emissions referred to above will be very difficult to contain. In addition, the number of trucks anticipated by the plant will introduce a great deal of diesel fumes into the environment, which will not be captured by any system, will fall to the ground, and contribute to pollution of the watershed. The watershed in this area, which includes the Sacramento River, supports a great deal of plant life and wildlife. And of course, the Sacramento River not only provides drinking water for a million households, it provides irrigation for a third of California agriculture. In addition, the Sacramento River is a popular flyfishing destination for fisherman from all over the world, as well as our own local fisherman. The Wintu Tribe fishes the mouth of Middle Creek for salmon for consumption.

Residents who live downstream of the current CCA operations say that the containment ponds overflow regularly during times of heavy rain.

- **Air pollution from quarry activities, crushing concrete**

From “Exposure to Dust and Concrete Smashing” published in *Construction and Demolition Recycling*

“In all cases where concrete is being smashed or size-reduced, demolition workers and crushing plant operators are breaking down materials with crystalline silica dust as a percentage of the particulate matter in part of the dust created. When a worker’s lungs are over-exposed to silica-containing dust, the potential damage is substantial. ‘Silicosis is a progressive, disabling and often fatal lung disease,’ OSHA says.

“... silicosis [can lead] to a list of even more serious health disorders, according to OSHA, including:

- **Lung cancer (silica has been classified as a human lung carcinogen);**
- **Bronchitis/chronic obstructive pulmonary disorder;**
- **Tuberculosis (silicosis makes an individual more susceptible to it);**
- **Scleroderma, a disease affecting skin, blood vessels, joints and skeletal muscles;**
- **Possible renal disease.**

From the *Ontario Gravel Watch*:

“Dust or airborne particulate matter (PM) varies in size. Total Suspended Particulate (TSP) refers to dust less than 100 microns in diameter. Large particles tend to settle quickly, smaller more harmful particles can be carried great distances. Dust is produced from blasting, crushing, screening and stacking operations as well as conveyor belts and loader and truck transport on site and trucks offsite. Dust is also produced during overburden removal and construction of berms and from wind blowing over stock piles and across barren pit floors. ... **Dust increases corrosion and is harmful to vegetation.**

“Fine particulate matter, 10 microns or less in diameter (PM 10) can be inhaled and is considered toxic. Smaller respirable particulate matter, (PM 2.5) with a diameter of 2.5 microns or less, is even more dangerous, lodging deep within the lungs and tissue. There is no biological mechanism for clearing it from the body.

“There is incontrovertible evidence that increased PM 10 is related to increases in cardiopulmonary disease, asthma, bronchitis, emphysema, pneumoconiosis and premature death in those with pre-existing conditions. The elderly and the young are most affected. Crystalline silica dust is common from processing sand and gravel and is a known carcinogen.”

CCA plans to have a concrete crushing operation as part of their expansion and of course, the quarry activities themselves produce a great deal of dust. Neighbors who live next door to or nearby the quarry say that the current owner has been lax in keeping the dust levels down,

and they don't expect any better compliance with a larger operation. For all of these reasons, I oppose the quarry expansion as well as the asphalt plant.

- **Sediment issues in drainages, creeks, streams, river**

Poor control of dust and sediment by CCA as reported by numerous neighbors has meant that nearby drainages and creeks have been significantly impacted, leading to turbidity in these waters and a reduction in fish populations. This is particularly injurious to the Wintu Tribe, who has a federal treaty that grants them fishing rights at the mouth of Middle Creek as it empties into the Sacramento River.

- **Light pollution from night operation**

Effects on humans

From "Missing the Dark: Health Effects of Light Pollution" published in *Environmental Health Perspectives*

"The 24-hour day/night cycle, known as the circadian clock, affects physiologic processes in almost all organisms. These processes include brain wave patterns, hormone production, cell regulation, and other biologic activities. Disruption of the circadian clock is linked to several medical disorders in humans, including depression, insomnia, cardiovascular disease, and cancer, says Paolo Sassone-Corsi, chairman of the Pharmacology Department at the University of California, Irvine, who has done extensive research on the circadian clock. "Studies show that the circadian cycle controls from ten to fifteen percent of our genes," he explains. "So the disruption of the circadian cycle can cause a lot of health problems."

A report from the National Institute of Environmental Health Sciences (NIEHS) on the connections between artificial lighting and human health stated, **"It may not be entirely coincidental that dramatic increases in the risk of breast and prostate cancers, obesity, and early-onset diabetes have mirrored the dramatic changes in the amount and pattern of artificial light generated during the night and day in modern societies over recent decades.** The science underlying these hypotheses has a solid base."

"The connection between artificial light and sleep disorders is a fairly intuitive one. Difficulties with adjusting the circadian clock can lead to a number of sleep disorders, including shift-work sleep disorder, which affects people who rotate shifts or work at night, and delayed sleep-phase syndrome, in which people tend to fall asleep very late at night and have difficulty waking up in time for work, school, or social engagements."

The findings from a study that appeared in the January 2008 issue of *Chronobiology International* found that, "even when controlling for population density, affluence, and air pollution, women living in neighborhoods where it was bright enough to read a book outside

at midnight had a 73% higher risk of developing breast cancer than those residing in areas with the least outdoor artificial lighting.”

Effect on wildlife

From “Missing the Dark: Health Effects of Light Pollution” published in *Environmental Health Perspectives*

“The ecologic effects of artificial light have been well documented. Light pollution has been shown to affect both flora and fauna. For instance, prolonged exposure to artificial light prevents many trees from adjusting to seasonal variations, according to Winslow Briggs’s chapter on plant responses in the 2006 book *Ecological Consequences of Artificial Night Lighting*. This, in turn, has implications for the wildlife that depend on trees for their natural habitat. Research on insects, turtles, birds, fish, reptiles, and other wildlife species shows that light pollution can alter behaviors, foraging areas, and breeding cycles, and not just in urban centers but in rural areas as well.

“Bright electric lights can also disrupt the behavior of birds. About 200 species of birds fly their migration patterns at night over North America ‘...Light attracts birds and disorients them,’ explains Michael Measure, executive director of the Toronto-based Fatal Light Awareness Program (FLAP), which works to safeguard migratory birds in the urban environment. ‘It is a serious situation because many species that collide frequently are known to be in long-term decline and some are already designated officially as threatened.’ **It should be noted that the nearby Sacramento River is one of the most important migratory flyways on the West Coast.**

“Frogs have been found to inhibit their mating calls when they are exposed to excessive light at night, reducing their reproductive capacity. The feeding behavior of bats also is altered by artificial light. Researchers have blamed light pollution for declines in populations of North American moths, according to ‘*Ecological Consequences of Artificial Night Lighting*.’”

Effects on Insect Populations

Insects are essential species to life on Earth, including human. According to recent research, as reported in *Smithsonian Magazine* and the magazine published by the Yale School of the Environment, insect numbers are plummeting at an increasing rate, which could spell “catastrophic” consequences for the planet. **Insects provide the basis of many food chains, pollinate both crops and wild plants (over three-quarters of wild plants in temperate regions depend on insect pollination to develop fruit and seeds and pollinating insects stabilize and improve three-quarters of the yields of all crops globally), recycle nutrients into the soil, and consume dung and carcasses of dead animals. So-called “friendly” insects prey upon pest species. More than 40% of insect species are falling globally and a third of species are endangered. Without insects, entire ecosystems would collapse.**

Industrial pollution and light pollution are key factors in the decline. Over half of insects are nocturnal and they depend on darkness to find mates, hunt for food, evade predators, and locate bodies of water where they breed. Light pollution, in fact, is one of the major causes of mortality for insects, which we depend on for our food and environmental stability.

The proposed asphalt plant will create two areas of significant concern for the viability of insect species: industrial pollution and light pollution, especially with the plan to run the plant 24 hrs a day. How will CCA ensure that they are not contributing to the decline in local insect populations, and how would an environmentally acceptable percentage be determined? Who would review and assess the validity of this determination?

- **Endangered Species Act**

Reports indicate that an insect listed as a federally threatened species makes its home in the area that CCA wants to expand its mining operations and build its asphalt plant, the Valley Elderberry Longhorn Beetle. What will the impact of the proposed expansion and asphalt plant be on this species?

- **Noise pollution from running of asphalt plant, blasting, and truck traffic**

Effects on Humans:

In one particular case, residents in a town in North Carolina claimed that the noise they experienced by an asphalt plant a mile away sounded “like you got a jet engine right next to your window.” The plant, however, claimed that at the distance of 800 ft, “the plant would generate about 54-56 decibels ... quoting from sound studies on asphalt plans over flat ground.” Note that the actual experience of noise levels from residents vary wildly from what the plant official said the noisiest aspects of the production process “would” generate, based on “sound studies.” 54 – 56 decibels is approximately the decibel level of normal conversation. A jet engine, on the other hand, produces 130 decibels.

From “Noise Pollution & Human Health: A Review,” a paper presented by four engineers for a conference on noise pollution:

“The potential health effects of noise pollution are numerous, pervasive, persistent, medically and socially significant. Noise produces direct and cumulative adverse effects that impair health and that degrade residential, social and working environment with corresponding real (economic) and intangible (well-being) losses. Noise represents an important public health problem that can lead to hearing loss, sleep disruption, cardiovascular disease, social handicaps, reduced productivity, negative social behaviour, annoyance reactions, absenteeism and accidents. It can impair the ability to enjoy one's property and leisure time and increases the frequency of antisocial behaviour. Noise adversely affects general health and well-being in the same way as does

chronic stress. It adversely affects future generations by degrading residential, social, and learning environments with corresponding economic losses. The aim of enlightened governmental controls should be to protect citizens from the adverse effects of airborne pollution, including those produced by noise. People have the right to choose the nature of their acoustical environment; it should not be imposed by others.

According to this paper, **deleterious effects that were observed in these areas of human health include:** “Hearing impairment, sleep disturbances (which have been documented to lead to increased blood pressure, increased heart rate, increased pulse amplitude, vasoconstriction, changes in respiration, and cardiac arrhythmias). Decreased alertness from disrupted sleep can lead to accidents, injuries, and death. Continuous noise in excess of 30 decibels disturbs sleep. Even the very optimistic level of 50 decibels claimed by the asphalt plant operator in North Carolina at a distance of 800 ft (which is well below the levels claimed by actual people living close to actual asphalt plants), this is noisy enough to have physiological impacts on human health.

“Studies of individuals exposed to occupational or environmental noise show that exposure of sufficient intensity and duration increases heart rate and peripheral resistance, increases blood pressure, increases blood viscosity and levels of blood lipids, causes shifts in electrolytes, and increases levels of epinephrine, norepinephrine, and cortisol ... Cardiovascular disturbances are independent of sleep disturbances; noise that does not interfere with the sleep of subjects may still provoke autonomic responses and secretion of epinephrine, norepinephrine, and cortisol.

“Noise pollution is not believed to be a cause of mental illness, but it is assumed to accelerate and intensify the development of latent mental disorders. **Noise pollution may cause or contribute to the following adverse effects: anxiety, stress, nervousness, nausea, headache, emotional instability, argumentativeness, sexual impotence, changes in mood, increase in social conflicts, neurosis, hysteria, and psychosis.** Population studies have suggested associations between noise and mental-health indicators, such as rating of well-being, symptom profiles, the use of psychoactive drugs and sleeping pills, and mental-hospital admission rates. Children, the elderly, and those with underlying depression may be particularly vulnerable to these effects because they may lack adequate coping mechanisms.”

Effects on Wildlife:

CCA wants to operate 24 hrs a day from Sunday evening to Friday afternoon, with attendant heavy truck traffic. This would create significant noise pollution. In the surrounding area, ubiquitous seasonal drainages provide breeding areas for amphibians. **Noise pollution has been demonstrated to interfere with their nocturnal croaking and other essential breeding activities. Noise pollution can interfere with mammals' ability to communicate, hunt, and mate as well. It can even cause illness in a wide range of wild creatures.**

- **Fire risk:**

What would happen if another fire as hot and destructive as the Carr Fire swept through an area where asphalt is being manufactured? **Asphalt itself is flammable. The propane used to power the plant is flammable. Many of the chemicals used to make the asphalt and stored on site are flammable.** The Carr Fire came only ten years after the Motion Fire, and the only reason there was not as much destruction with the Motion Fire is that the climate here had not become as hot and dry as it is now. Mega wildfires are the new normal with our increasingly hot summers and longer droughts and longer dry seasons. There is plenty of unburned fuel left to burn in the area. In fact, burned trees are more flammable than living ones, according to firefighters. And there is, of course, a lumber mill right next door, which burned in the Carr Fire. Temperatures reached 2700° F. The fire doesn't even have to be that hot to ignite flammable materials like asphalt and the chemicals and materials used to make asphalt. There is an informal shooting range down the road a few miles where fires are routinely ignited every summer. **What kind of toxic gases would be released if a fire overran the plant? What kind of toxins would be left in the soil? Explosions are likely in a wildfire, which would increase the destructiveness enormously.**

• **Environmental Impacts of Truck Traffic and Truck Routes:**

We understand that over 1000 trucks a day could be traveling to and from the asphalt plant and quarry. There are four main routes that the trucks can take (South/west on Iron Mtn Rd then west on 299; South/west on Iron Mtn Rd, then east on 299, Buenaventura to 273; South/west on Iron Mtn Rd then east on 299 and into downtown Redding, past two high schools and urban neighborhoods, then turning either north or south where Eureka Way dead-ends into Market St, where a north turn would take trucks past the entrance to Turtle Bay elementary school; or north/east on Iron Mtn to Keswick Dam Rd, onto Lake Blvd, the latter of which is populated with dense urban neighborhoods such as Lake Keswick Estates while Keswick Dam Rd are has rural residential development). **All of these routes take trucks containing asphalt or materials to make the asphalt through residential neighborhoods, significantly increasing the exposure of these residential areas to fugitive emissions from asphalt transport as well as the air pollution posed by diesel exhaust. This traffic would also introduce both nighttime noise and light pollution, since CCA wants to operate 24 hrs a day.** Because there are already three other asphalt plants in the area that are capable of meeting the need for asphalt, none which expose residential areas to the hazards represented by this kind of truck traffic, this is an entirely inappropriate location for an asphalt plant which serves no critical need.

Another question that needs to be asked: **Will there be trucks carrying toxic, flammable, and dangerous substances such as toluene and benzene through these residential areas?** Although rare, accidents happen; spills happen. Why should residents of all the residential areas through which trucks travel be exposed to these risks as well? And how can CCA guarantee the safety of these neighborhoods?

The increased congestion that would be introduced into all of these routes, given the expected number of trucks coming to and from the quarry would increase the amount of time that

motorists and other trucks spend idling at intersections. This would increase the amount of air pollution for the entire area.

Currently, whenever I drive into Redding via Iron Mtn Rd, I encounter truck traffic associated with the quarry. Truck drivers often neglect to stop at the stop sign where the road to the quarry intersects with Iron Mtn Rd and I have experienced more than one near-miss collision. We have had our car windshield cracked by gravel carried by one of the trucks, and we are not the only ones. More truck traffic, especially of the magnitude proposed by CCA would make our trips into town for work and errands onerous.

- **NEPA, Army Corps of Engineers, Non-jurisdictional Aquatic Resources**

Given that there is a federal treaty with the Wintu tribe regarding fishing rights at the mouth of Middle Creek, shouldn't NEPA and the Army Corps of Engineers be involved in assessing this proposal? In construction projects that I have overseen in the county, where water resources involved any federal oversight or interests, they were.

In addition, has CCA received verification from the U.S. Army Corps of Engineers on the assessment of non-jurisdiction for federal Clean Water Act 404, by the State Fish & Wildlife for the LSAA program and the Regional Water Quality Control board under the Porter-Cologne Act, regarding the 9 acres of aquatic resources? If not, why not? If not, shouldn't this be undertaken?

- **Oversight:**

Residents who live near the quarry have stated that CCA is not a good neighbor in terms of making certain that dust and sediment mitigation meet established and agreed-upon environmental standards. There is concern that the county does not possess the resources to enforce the impacts that exist with the current operations. Expanding operations would almost certainly exacerbate this problem and should be of significant concern to those responsible for oversight and enforcement. **Interested parties are not capable of providing sufficient oversight or enforcement.**

- **Impact on Greater Area/Economic Impact**

The assumption of this proposal seems to be that only Keswick will be affected. But having something like an asphalt plant so close could make the symbol of west Redding, rather than Whiskeytown, an asphalt plant and giant quarry. As mentioned above, there are four routes that the truck traffic to and from the quarry and plant could take. One would be to go west on 299. Traveling south/west on Iron Mtn Rd, trucks would need to drive through a residential area; in addition, there is a trail crossing for the Middle Creek Trail on that road, with a short line of sight, which could be dangerous for those using the trail. **Heavy truck traffic traveling west on 299 could negatively impact traffic coming from Redding**

and the surrounding areas to Whiskeytown and all the other outdoor recreation areas that residents and visitors alike enjoy using.

The other would be to go east on 299 to Buenaventura Dr and turn south to head to Hwy 273 and I-5. There is often quite a bit of congestion at the intersection of Eureka Way/299W and Buenaventura when Shasta High School and U Prep classes begin and let out for the day. Increased truck traffic would create further congestion. In addition, **there are several very nice neighborhoods along Buenaventura between Eureka Way and Placer on the east; to the west, is a large senior living facility. A substantial increase in truck traffic could well diminish their quality of life.** Moreover, there is an enchanting walking and biking trail that begins at Placer and parallels Buenaventura going south. It is marbled with drainages and wetlands that are teeming with amphibians. Amphibians are very sensitive to all kinds of pollution, chemical, noise, and light. Not only would a substantial increase in heavy truck traffic at all hours potentially disrupt those populations, it would significantly change the atmosphere and pleasantness of that trail, especially if we're talking about smelly asphalt trucks. The City of Redding has clearly invested a lot into building the trail and installing an underpass. Nearby residents use the trail regularly and could easily be negatively impacted.

A third route would take heavy truck traffic past both high schools, where there are a lot of children crossing the street and getting in and out of cars and buses. Then it would snake through the middle of town, which is already congested. There are times of day when traffic backs up past one or more traffic lights. With an increase in heavy truck traffic, this could be a traffic nightmare. Not only that, the city has just spent millions of dollars and several years renovating the downtown mall to make it livable, walkable, and inviting, with apartment space above the ground floor. Downtown has a real potential for a renaissance. But if there are hundreds of asphalt trucks driving through? Not so much.

If the trucks turn left in downtown to go up North Market, they will be driving through the Miracle Mile and impacting all those businesses; in addition, there is the entrance to the Turtle Bay Elementary School. This school regularly takes children outside for field trips in the surrounding area, and children are particularly vulnerable to chemical pollution. The intersection of North Market and Lake Blvd would be heavily impacted. **The fact that North Market was the escape route during the Carr Fire, and that it took an hour-an-a-half to drive a mile or less during the evacuation, should give us all extreme pause in creating any significant increase in traffic, especially heavy truck traffic, on this particular route.**

The fourth route would take the trucks north along Keswick Dam Rd, which is twisty and turny and popular with bicyclists, where there is often little to no shoulder and where there is a trail crossing for the Sacramento River Trail with a very short line of sight. The road over Keswick Dam itself is narrow and dicey even with pickup trucks. Regular heavy truck traffic would create unsafe conditions. Because the dam cannot accept trucks that are too heavy, I imagine this route would probably be used less often, which would increase the traffic pressure on the other routes.

Has the City of Redding been fully apprised of the impacts that this proposed project would have on the quality of life of those living in the city limits? People may think that it will alter only the character of Keswick, but it could easily alter the character of west Redding. A lot of outdoor recreation takes place west of Redding and there are a lot of very nice neighborhoods in west Redding where many of the higher income bracket residents make their home. West Redding has always been the quieter side of town, where the business presence is medical, law, and governmental; the commercial presence is independently-owned businesses that are small and personal. People live on the west side of town for the nearby recreational resources, for the quiet, nature, and clean air. A huge sector of our local economy is tourism and outdoor recreation. The French Fry trail, Middle Creek Trail, and Sacramento River and Rail Trails are all close by the proposed plant and the quality of the recreation, healthful aspects, and enjoyment of the trails would be seriously impacted, if not in some cases, destroyed. **This speaks directly to welfare of the surrounding area and the incompatibility of the proposal with the surrounding area.**

Local dermatologist and civic leader Ron Reece had this to say during the EIR Scoping Meeting March 9, 2021: "I'm a local physician. I live off Victoria, and I'm involved with numerous committees and projects that are trying to enhance the growth of our community. They all include recreation around Whiskeytown lake, our trails, biking, clean air. This plant and enlargement of CCA is totally regressive, it's amazingly regressive, it's going in the opposite direction that we're trying to build our community and attract visitors. We're trying to induce small corporations at Stillwater and to all of a sudden say, oh, we're now promoting an asphalt plant ... it staggers my imagination that this company would even consider that in the direction we're trying to grow our community. If I were a young family coming to our community, I would stay away from west Redding. **The concept that you can mitigate the smell of an asphalt plant and all the toxins is a myth. Even if you meet every single state and federal guideline, you'll still be spewing this junk into the community. It looks like a bomb has gone off and that's all we need is to have an asphalt plant spewing their toxins into the air to rebuild. This is not the image our city needs. This is going back to the Dark Ages, this is going back to the Superfund mining disaster we already have. It's going to have a catastrophic effect on the minds of people, corporations, tourists, visitors, and business that we want coming here.**

Property values in West Redding could drop. Those in the area of Keswick most certainly would; a study conducted in North Carolina found a 56% drop in property values to homes located in the vicinity of a newly built asphalt plant. My wife and I have owned our property since 1980, hand-built our home and outbuildings, installed custom cherry and maple cabinets, large permanent stained-glass windows, a custom Finnish soapstone stove, custom finish work, custom tile, and we have lavished just as much of our time and money in our grounds. Our view is spectacular. We did a lot of this work when we were young, and there is no way we could reproduce what we have here someplace else, especially if our property values drop from having an asphalt plant built less than a mile away from my home. And I know that we are not the only story like this in the radius of those properties that would be impacted by CCA's proposal. Many of the residents have just rebuilt from the Carr Fire; the casual cruelty of inflicting more noxious influences on their home life is honestly very difficult to fathom.

• **The Big Environmental Picture:**

Let's be clear: **Even though an EIR could seek to identify only local and short-term environmental hazards and dangers posed, we no longer have that luxury. Industrial activity and facilities add to the growing burden on the climate in general.** As alluded to earlier in the discussion on negative impacts posed by industrial pollution, it is essential that we get as much vegetation growing back as possible to take as much carbon dioxide out of the air as possible in order to mitigate climate change going forward. The new "mega wildfires," which describe both the Carr Fire and the Camp Fire, have been directly attributed to climate change by scientific experts and climate scientists. In our area, climate change takes the form of longer and hotter dry seasons and shorter and drier wet seasons, setting up the conditions for mega wildfires. **Industrial development contributes directly to negative environmental impacts by their emissions; they contribute indirectly by reducing the number of trees, bushes, and other plants that remove greenhouse gases from the atmosphere.**

Driving by the quarry almost every day, I can see that the earlier efforts at re-vegetation promised by CCA seem half-hearted at best. An expansion of the quarry would take even more green space out of circulation. We like to leave out the enormous economic impact of climate change and consequences such as mega wildfires when we contemplate something like the building of an asphalt plant or quarry expansion, but they are real and quantifiable. We ignore the connection between our economic activities and the climate at our extreme peril. These impacts are not restricted to the present. They will affect the quality of life for our children, grandchildren, and future generations beyond. I would hope and expect that the health of the environment in the long term would be taken into account in any Environmental Impact Report.

For all of the above reasons and concerns, I oppose both the asphalt plant and quarry expansion. I do not feel that it is in the best interests of the vast majority of the citizens of the county, nor of the future of the county and its most valuable sustainable and long-term economic resources. How would or could CCA mitigate the issues listed to the level of acceptable risk? Given the breadth and depth and seriousness of the issues involved, I find it very hard to believe that they could do so.

Thank you,
Richard B. Hardie
15812 Rock Creek Rd
Redding, CA 96001

Richard B. Hardie III
Senior Financial Advisor
Hill Country Health and Wellness Center
PO Box 228
Round Mountain, CA 96084

FW: Meeting Request

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/16/2021 8:05 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Leonard Moty <lmoty@co.shasta.ca.us>
Sent: Monday, March 15, 2021 11:04 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Fw: Meeting Request

Tara,
Please add Mr. Endraske to the list of those interested in the Clear Creek Aggregate project.
Thank you.

From: Mark Endraske
Sent: Monday, March 15, 2021 4:51 PM
To: Leonard Moty <lmoty@co.shasta.ca.us>
Subject: Re: Meeting Request

Hi. Thank you for getting back to me. What time works for you on the 19th? I can make the afternoon work.

Mark

On Thu, Mar 11, 2021 at 11:18 PM Leonard Moty <lmoty@co.shasta.ca.us> wrote:

Mark,
I do not have time available before the 16th. I may have some time on Friday the 19th. Otherwise, the week after. I don't believe the asphalt plant is time sensitive at this point. Perhaps, we could talk on the phone.
Leonard Moty

From:
Sent: Thursday, March 11, 2021 9:47 PM
To: Leonard Moty <lmoty@co.shasta.ca.us>
Subject: Meeting Request

Hi Mr. Moty,

Thank you for responding on messenger. It would be great to set up a time to meet. Would it be possible to connect before March 16 BOS meeting?

I am open to and would prefer an in person meeting, but I understand if Zoom would be necessary.

I want to discuss the asphalt plant and make sure you hear from the perspective of residents in district 2 (Shasta).

Thank you for your time.

Mark Endraske

15639 Rock Creek Rd.


FW: Transportation problems with CCA Asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/16/2021 2:01 PM

To: Bruce Grove <barove@shn-engr.com>

Cc:

 1 attachments (15 KB)

Crystal creek asphalt transportation problems sent.docx;

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Richard Robinson
Sent: Tuesday, March 16, 2021 11:41 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Transportation problems with CCA Asphalt plant

Hi Tara. I have attached a file to this with concerns about trucking the asphalt. Will the attachment work for you?
Thanks Richard Robinson.

Crystal Creek Aggerate Asphalt plant Problems

1. Truck Traffic on Iron Mountain Rd.
 - a. Damage to a County Rd that is old and already needs repair.
 - b. Trucks backing up turning into the plant.
 - c. Trucks backing up getting on to 299.
 - d. CalFire emergency getting out of the station and onto 299 or going north if trucks are backed up on Iron Mountain Rd.
 - e. Bicycles on Iron Mountain Rd. State law requires 3 ft passing. Iron Mountain has a double yellow line and blind corners and hills. This will make for dangerous passing.
 - f. The Middle creek trail crossing is already dangerous with short lines of sight.
 - g. Will there be an acceleration lane for trucks going both east and west getting onto 299.
 - h. Forklifts and pedestrians crossing Iron Mountain Rd at Weyerhaeuser.
 - i. There are 3 bike trails starting or crossing Iron Mountain Rd.
 - j. Iron Mountain road is used as a link between those trails.
2. Keswick Dam Rd. Trucks returning from I-5 north or 299 east will return using Keswick Dam Rd.
 - a. Those residents on along Keswick Dam road should be notified. The trucks will bring added noise and air pollution to them.
 - b. Keswick Dam is narrow with sharp corners at both ends. During the Carr fire clean up they had to post traffic control at both ends.
 - c. The main River Trail crosses Keswick Dam Rd. That crossing has short lines of sight making it dangerous for heavy truck traffic.
3. Downtown Redding
 - a. Trucks going north or east on 44 will route through the heart of downtown Redding which already has traffic backed most of the day. Has the City been notified of this?
 - b. These trucks will drive past Shasta High School and U-Prep school. Both of which have large numbers of cars dropping of students. Have the schools been notified.
4. Asphalt trucks drip oil and material spreading their pollution everywhere. We will have a black strip following their path many times of the year.
 - a. The trailers are sprayed with oil/diesel to let the asphalt slid out easily. Will the area they are sprayed be contained?

Richard Robinson

11343 Tanstaaf Ln

Redding Ca.96001

Transportation study CCA proposal

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/16/2021 4:24 PM

To: Bruce Grove <bgrove@shn-engr.com>

Cc: Eihnard Diaz <ediaz@shasta.com>; Tara Petti <tpetti@co.shasta.ca.us>

Hi folks, I received a phone call requesting the scope of analysis for Transportation include impacts to the intersection of Buenaventura and Eureka Way.

Tara Petti

Associate Planner

Shasta County Department of Resource Management

Planning Division

1855 Placer Street Suite 103

Redding, CA. 96001

Department Main Line (530)225-5532

FW: Concerns regarding proposed Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Wed 3/17/2021 9:38 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Rachel Tate

Sent: Tuesday, March 16, 2021 8:13 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Concerns regarding proposed Asphalt Plant

Dear Ms. Petti,

My husband and I are property owners in West Redding on Laurie Ann Lane off of Iron Mtn. Road just across from Crystal Creek Aggregate. We are deeply concerned over the proposed Asphalt Plant that Crystal Creek Aggregate is seeking to build on Iron Mtn. Road. The purpose of this email is to voice our opposition to this proposal.

We lived on Laurie Ann Lane from 1996-2018 until the Carr Fire demolished our neighborhood. Over the past two and a half years since that crisis, our neighborhood has slowly been rebuilding. I believe you can understand the opposition that we have at the possibility of another "crisis" coming to our area.

We are opposed to:

- the air pollutants and fumes that will be created that are a threat to health
- the heavy increase in truck traffic in the area
- the negative impact on property values
- the negative impact on the recreational region

We trust that you will take into deep consideration all the negative implications that this proposal has on the lives of the people in West Redding.

Thank you,
Rachel and David Tate
Property Owners

FW: Please add my name to your petition and my comment

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 8:01 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Susan Bradfield
Sent: Thursday, March 18, 2021 7:50 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Please add my name to your petition and my comment

Susan Bradfield The choices You make now will impact not only us and our quality of life but also that of our children and grandchildren. Please choose in their behalf.

FW: Input on Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 8:03 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Lynn E. Fritz
Sent: Wednesday, March 17, 2021 9:52 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Input on Asphalt Plant

T: Tara Petti
Shasta County Dept of Resource Management
Planning Division

Re: Keswick Asphalt Plant

I oppose the asphalt plant in the Keswick area. This area and its residents have been severely impacted by the Carr Fire and are struggling with recovery. A commercial entity like an asphalt plant has no place near a residential area with its light, noise, air quality, traffic impact. It would sorely impede recovery. Some have decided to sell their property after the Carr Fire. This would further impede market values for property that has already been impacted by wildfire.

There are other more remote locations in Shasta County that are more suitable for such a commercial entity. I would be gravely upset if such a project was allowed in my neighborhood/vicinity.

Please do not allow this project to move forward.

Thank you for your efforts in seeking community feedback.

Sincerely,
Lynn E. Fritz
Redding Resident

FW: No asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 8:09 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: deanholden
Sent: Wednesday, March 17, 2021 8:47 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: No asphalt plant

I'm firmly against the aggregate asphalt plant expansion.

Dean Holden
Redding, Ca

Sent from my Galaxy

FW: I oppose the asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 8:15 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Kit Harvey

Sent: Wednesday, March 17, 2021 8:01 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: I oppose the asphalt plant

Please add my name in opposition to the proposed asphalt plant.
Kit Harvey

Sent from my iPhone

FW: Crystal Creek Aggregate Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 8:15 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Janet Landles
Sent: Wednesday, March 17, 2021 6:20 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Aggregate Asphalt Plant

To whom it may concern:

This time Crystal Creek Aggregate has gone too far. I remember when they were just going to be a small gravel plant. Then they expanded and blew up the hillside to extract more rock. The neighbors endured blasts, noise and dust, and some even showed pictures of cracks in walls and foundations.

Now the push to make even more money **AT THE EXPENSE OF THE SURROUNDING NEIGHBORHOOD** is too much to take. Please don't allow them to do this. The people who live there have endured enough already. So many have spent their life savings rebuilding after the Carr Fire, and now this plant will destroy their investment.

My grandfather owned the land when it was called Kett and was a railroad stop to pick up lumber. I have cared about the people of Keswick and the surrounding hills all my life. I have watched it slowly recover from the poisonous effect of mercury. I owned a house on Rock Creek before the fire and raised my kids there part-time. These are good people trying to build a good life on affordable property. This will gut their property values. Please don't allow another punch to the gut in this region!

Respectfully,

Janet Landles

FW: Subscribe

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 8:16 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Jim Dowling
Sent: Wednesday, March 17, 2021 4:58 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Subscribe

Sent from Mail for Windows 10

FW: Asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 1:20 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Ellen Sweeney
Sent: Thursday, March 18, 2021 12:48 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Asphalt plant

Good afternoon Tara,

I am a Redding resident and homeowner who is strongly opposed to the proposed asphalt plant on Iron Mountain Road.

As if the health concerns weren't bad enough (toxic fumes, water pollution), the impact on traffic in the Keswick area and throughout Redding is unacceptable. Iron Mountain Road is nowhere near capable of withstanding additional truck traffic. With all the money the City of Redding is spending to beautify our city, I would think the last thing you would want is more pollution and truck traffic.

This isn't just a case of NIMBYism. We're trying to entice people to visit our beautiful part of the State, and adding an asphalt plant a few miles from Whiskeytown Recreation Area is a grave disservice.

Thank you for your consideration.

Ellen Sweeney
3275 Harlan Drive, Redding

*Until he extends his circle of compassion to include all living things, man will not himself find peace. -
Albert Schweitzer*

FW: Crystal Creek Aggregate Asphalt Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 1:37 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: David Zoll

Sent: Thursday, March 18, 2021 1:19 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Crystal Creek Aggregate Asphalt Expansion Project

Please add my name to the community letter opposing the Crystal Creek Asphalt Plant. Thank you, David Zoll, 3118 Corto St., Redding.

FW: Asphalt mine

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 1:39 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Account Update
Sent: Thursday, March 18, 2021 12:03 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Asphalt mine

I, too, oppose the new mine as I live just downstream from the proposed site. I do not think this would help our community in a positive way.

Sent from Mail for Windows 10

MAR 17 2021

DEPT OF RESOURCE MGMT
BUILDING DIVISION

Keswick Resident's Concerns with the Crystal Creek Aggregate Expansion Project

To Whom It May Concern:

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics:

The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation.

The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night. The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality:

Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen².

There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few.

¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005

² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110

People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move.

Biological Resources:

The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts to California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources.

See additional biological resource concerns in the Hydrology and Water Quality section.

Energy:

Local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like manzanita and oak, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire.

Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials:

See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality:

The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter.

The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property.

The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few un-dammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the

Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³.

Land Use and Planning:

While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise:

Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest.

With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill.

While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation:

The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this

³ 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021

⁴ Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020

part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come to, primarily to get into the woods and enjoy the fresh air.

Transportation:

The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry.

The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue.

Wildfire:

The local community has concerns about the new asphalt plans impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories:

The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes

⁵ Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020

4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶.

In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion:

The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry.

The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,
The Local Keswick Community

Name TREVOR TOWNE

Signed Trevor Towne

Date 03/14/2021

⁶ Per conversations with Northstate and J.F. Shay asphalt plant operators, February 26th 2021

MAR 17 2021

PLANNING RESOURCE MGMT
BUILDING DIVISION

Keswick Resident's Concerns with the Crystal Creek Aggregate Expansion Project

To Whom It May Concern:

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics:

The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation.

The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night. The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality:

Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen².

There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few.

¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005

² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110

People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move.

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The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts to California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources.

See additional biological resource concerns in the Hydrology and Water Quality section.

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Local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like manzanita and oak, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire.

Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials:

See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality:

The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter.

The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property.

The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

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Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³.

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While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

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Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest.

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The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this

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⁴ Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020

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The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue.

Wildfire:

The local community has concerns about the new asphalt plans impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

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The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes

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The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion:

The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry.

The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,
The Local Keswick Community

Name ~~Mark Jusino~~ Mark Jusino

Signed Mark Jusino

Date 3/14/21

⁶ Per conversations with Northstate and J.F. Shay asphalt plant operators, February 26th 2021

FW: CRYSTAL CREEK AGGREGATE PROJECT

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 1:43 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Lynne Wonacott
Sent: Thursday, March 18, 2021 12:01 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: CRYSTAL CREEK AGGREGATE PROJECT

The significant number of environmental impacts to the surrounding land and local community are mind numbing with little way for them to be mitigated. I believe that the expansion is excessive and should be denied. Normally I would give economic issues a lot of latitude to bring income and jobs to Shasta county but this project is over the top and the negative aspects far outweigh any positive ones.

Lynne Wonacott
6782 Hemlock Street
Redding, CA 96001

March 16, 2021

RECEIVED
SHASTA COUNTY

MAR 17 2021

Tara Petti, Associate Planner
1855 Placer Street, Suite 103
Redding, CA 96001

DEPT OF RESOURCE MGMT
PLANNING DIVISION

Ms. Petti:

After reading the proposed plan for the : Crystal Creek Aggregate Expansion Project. I am submitting my letter of opposition for the following reasons.

Environmental Impact Study

I did not relist all the text of the study as I am sure you are familiar with them. The following areas are my primary areas of concern:

AIR QUALITY:

All areas studied show a significant impact.

BIOLOGICAL RESOURCES

First four areas studied show a significant impact.

ENERGY

Significant impact in this area

Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

GREENHOUSE GAS EMISSIONS

Both areas studied show significant impact.

HAZARDS AND HAZARDOUS MATERIALS

Areas listed below show significant impact.

Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Noise

Showed significant impact on first two areas—especially important to local residents!

POPULATION AND HOUSING/PUBLIC SERVICES

I strongly disagree with the findings of "No Impact" in these areas.

TRANSPORTATION

Last but certainly not least are the finding from the study that show **significant impact** to all areas studied.

I did not mention all areas that were studied in the Environmental Impact section of the proposal although I consider all important.

Both Keswick and Shasta are in the process of trying to recover from the devastating Carr Fire. Residents are still in the process of rebuilding. Many are expressing concern over the negative impact this plant will have on property values. Both communities are hoping to attract new people to our communities.. This proposed plant will have an adverse effect on both of those goals.

Sincerely,

A handwritten signature in cursive script that reads "Judy Smith". The signature is written in black ink and is positioned to the right of the typed name.

Judy Smith

FW: Residents' Concerns with the Crystal Creek Aggregate Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 1:45 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: randy compton

Sent: Thursday, March 18, 2021 12:01 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Residents' Concerns with the Crystal Creek Aggregate Expansion Project

Residents' Concerns with the Crystal Creek Aggregate Expansion Project

To:

Tara Petti,
Shasta County Department of Resource Management
Planning Division
1855 Placer St. #103
Redding, CA 96001

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics: The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation. The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night.

The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality: Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution

in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen². There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few. ¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005 ² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110 People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move. Biological Resources:

The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts to California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources. See additional biological resource concerns in the Hydrology and Water Quality section.

Energy: Local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like manzanita and oak, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire. Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials: See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality: The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter. The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property. The quarry has a history of not watering their existing roads well enough. Trucks

leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few un-dammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³. Land Use and Planning: While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise: Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest. With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill. While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation: The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this 3 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021⁴ Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020 part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come too, primarily to get into the woods and enjoy the fresh air.

Transportation: The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry. The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue. Wildfire: The local community has concerns about the new asphalt plans impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories: The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes 5 Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020 4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶. In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion: The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry. The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

I want to add that this water shed is mostly solid rock, the waters have traditionally been crystal clear and precipitation drains off fast. Any pollutants, airborne or otherwise, will be immediately washed into the Sacramento River. We are still dealing with the crisis of Iron Mtn. in this area and this expansion should be denied.

Sincerely,

The Local Keswick Community
and

Add Your Name__ Randy Compton _____ Date_3/18/2021 _____

Your City or Community area: __Round Mountain _____

RECEIVED
SHASTA COUNTY

MAR 17 2021

DEPT OF RESOURCE MGMT
PLANNING DIVISION

To: Shasta County Planning Department
1855 Placer Street
Redding, CA 96001

From: Kurt Schuhmeier
11052 Iron Mountain Road
Redding, CA 96001

Subject: Crystal Creek Aggregate (CCA) Expansion
Aquatic Resources designated as non-jurisdictional by rule

Hi Ms. Petti,

On Figure 3 of the Initial Study (CCA) the drawing states that there are over 9 acres of aquatic resources designated as Non-Jurisdictional by Rule. Please send me verification that the Shasta County Planning Department has evidence that it was deemed non-jurisdictional, and by whom.

According to my understanding the following governmental agencies need to be contacted regarding this non-jurisdictional assessment:

- 1) U.S. Army Corps of Engineers for Federal Clean Water Act 404
- 2) Fish and Wildlife for Lake and Streambed Alteration Agreement (LSAA) program.
- 3) Regional Water Quality Control Board under the Porter-Colone Act.

Please provide verification and related documents (to include correspondence) that the County of Shasta has received verification of the non-jurisdictional by Rule status referenced in the first paragraph from the three agencies listed above.

I truly believe there are 20 or more acres of aquatic resources to the north and north-west, which are not on the CCA property, that will be affected by CCA's mining operation. However, I am not qualified to make this assessment.

I would appreciate the information requested above.

Respectfully,

Kurt Schuhmeier 03-15-2021

Kurt Schuhmeier

cc: U.S. Fish and Wildlife
Regional Water Quality Board
Army Corps of Engineers for the Federal Clean Water Act

To: Ms. Petti
Shasta County Planning Department
1855 Placer Street
Redding, CA 96001

From: Kurt Schuhmeier
11052 Iron Mountain Road
Redding, CA 96001

RE: Crystal Creek Aggregate Expansion Project

Ms. Petti,

You may or may not know, Crystal Creek Aggregate expansion covers two areas which has had extensive hard rock gold extraction in years gone by (1920 -1940). One stamp mill operated on one site and a ball mill operated approximately 100 yards away. Rock was being crushed and recovered using mercury.

I strongly suspect some of this soil had been contaminated. Water and soil samples need to be done for mercury and arsenic by an independent entity. By mg/liter or some other appropriate measure.

I am not sure how much contaminated water he is allowed to release. However, our community has never notified so that we could challenge this release. That is also why it is so important to find out who signed off on the aquatic resource designation of Non-Jurisdictional. *Rule* This person may not have had legal authority to do so.

Please include this in the EIR Report.

Thank You,

Kurt Schuhmeier

KW Schmeier 03-15-2021

*MALAGA County WATER Dist. v. CENTRAL VALLEY REGIONAL
WATER QUALITY CONTROL BOARD, 58 CAL. APP. 5TH 396 (2020).*

FW: Proposed asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 1:49 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Paul Hughes

Sent: Thursday, March 18, 2021 11:43 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Proposed asphalt plant

For so many reasons of health and quality of life for our community, I urge you to deny the permit for the proposed asphalt plant.

Pam Hughes
697 Mary St.
Redding, CA 96001

Sent from my iPad

FW: Proposed Asphalt Plant Construction

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 1:50 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Chris Harvey
Sent: Thursday, March 18, 2021 11:35 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Proposed Asphalt Plant Construction

To Whom It May Concern:

We are very strongly opposed to the planned construction on an asphalt plant off Iron Mountain Road near the community of Keswick. The operation of this plant would cause substantial pollution of the environment, not only in the Keswick area but to all areas downwind of the plant.

Sincerely,

Chris and Billie Harvey
750 Pioneer Ct.
Redding , CA 96001

FW: Crystal Creek Aggregate Asphalt Plant Expansion Project, I Object !

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 1:55 PM

To: Bruce Grove <bgrove@shn-engr.com>

Thank you for your comments, they have been added to the administrative record. Currently the County is in the early phases of the environmental review process for the project and is seeking comments until March 22nd to help identify potential impacts to the physical environment that should be studied/analyzed in the Draft Environmental Impact Report (EIR). Once the Draft EIR is complete, it will be circulated and the public and agencies will have an opportunity to comment on the adequacy of analysis in the EIR. Subsequently, a Final EIR will be completed including responses to all pertinent comments, and a Planning Commission hearing will be scheduled. Members of the public may attend the hearing and express all types of concerns regarding the merits of the project. The Planning Commission is the governing body that will approve or deny the project.

I hope this information is helpful. Please feel free to contact me with questions.

Tara Petti

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Planning Division
1855 Placer Street Suite 103
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Department Main Line (530)225-5532

From: Frank Treadway
Sent: Thursday, March 18, 2021 1:50 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: re: Crystal Creek Aggregate Asphalt Plant Expansion Project, I Object !

Dear Ms. Petti,

I'm writing to object to the expansion of the Crystal Creek Aggregate Asphalt Plant in the Keswick and Old Shasta area of Shasta County.

I have a number of friends who live in this area of Shasta County and I feel they'll be unduly harmed in an environmental manner.

Please add my name to the community letter opposing the proposed Crystal Creek Aggregate Asphalt Plant Expansion Project.

Thank You,
Frank D. Treadway
1729 Chestnut St.
ReddingCA 96001

FW: CCA asphalt plant proposal

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:03 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
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From: Dana Silberstein
Sent: Thursday, March 18, 2021 1:38 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: CCA asphalt plant proposal

It is very difficult to believe that we still have to fight and struggle to maintain basic decent health, safety and lifestyle considerations in this area. Why would we ever make it harder for people to sleep in their own homes, for their children to breathe clean air or come in contact with clean water?

This proposed project flies in the face of all common sense. It would pollute the air, greatly compound a noise problem and foul the water.

It is beyond me how we keep considering these incredibly damaging old fashioned plants instead of developing materials and methods that don't make people ill.

My son and grandson live in the general area of this proposed plant and both suffer from respiratory issues. Particularly when added to potential wildfires in the future, I hardly think the owners of this proposed plant want to make those health issues worse.

Like it or not, the area is surrounded by residential use. Most people cannot just abandon jobs and properties to move away because they've been shoved out. The time has passed to construct this ridiculous plant. In addition, the Carr Fire left few unburned trails for hiking and biking in that area. This project would help destroy at least two more.

We can't oppose this strongly enough.

Dana Silberstein

FW: Concerns of proposed Crystal Creek Aggregate Inc expansion project

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:04 PM

To: Bruce Grove <bgrove@shn-engr.com>

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From: stephen hofkin

Sent: Thursday, March 18, 2021 1:23 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Concerns of proposed Crystal Creek Aggregate Inc expansion project

To:

Tara Petti,
Shasta County Department of Resource Management
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1855 Placer St. #103
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The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few undammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³. **Land Use and Planning:** While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within

zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise: Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest. With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill. While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation: The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this 3 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021 4 Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020 part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come too, primarily to get into the woods and enjoy the fresh air.

Transportation: The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry. The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated

the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue. Wildfire: The local community has concerns about the new asphalt plans impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories: The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes 5 Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020 4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away. In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion: The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry. The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,

Stephen Hofkin, MD

Redding, CA.

FW: Input on Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:14 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Lynn Fritz
Sent: Thursday, March 18, 2021 11:14 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Re: Input on Asphalt Plant

I host a weekly program called "enjoy exceptional living" on KFOI 90.9 FM community radio. Tom Ramont is coming in from your agency to talk about general information about what Dept of Resource Management is about.

I'm wondering if you might come in and talk about the specific process for the review of the asphalt plant or any project you might have and where and what ways are best ways for people to give feedback. Of course the real question is what is the timing for doing a radio program. Is it best to talk about their EIR results? Let me know what you think.

Lynn E Fritz
Licensed Marriage Family Therapist

On Mar 18, 2021, at 8:08 AM, Tara Petti <tpetti@co.shasta.ca.us> wrote:

Thank you for your comments, they have been added to the administrative record. Currently the project is in the early phases of the environmental review process and the County is seeking comments until March 22nd on potential impacts to the physical environment that should be studied/analyzed in the Draft Environmental Impact Report (EIR). Once the Draft EIR is complete, it will be circulated for public review for comments on the adequacy of analysis in the Report. Subsequently, a Final EIR will be completed including responses to all pertinent comments, and a Planning Commission hearing will be scheduled. At that time the public will have the opportunity to attend the hearing and express all types of concerns regarding the merits of the project. The Planning Commission will be the entity that approves or denies the project.

I hope this outline is helpful for you. Please feel free to contact me with questions.

Best Regards,

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Lynn E. Fritz
Sent: Wednesday, March 17, 2021 9:52 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Input on Asphalt Plant

T: Tara Petti
Shasta County Dept of Resource Management
Planning Division

Re: Keswick Asphalt Plant

I oppose the asphalt plant in the Keswick area. This area and its residents have been severely impacted by the Carr Fire and are struggling with recovery. A commercial entity like an asphalt plant has no place near a residential area with its light, noise, air quality, traffic impact. It would sorely impede recovery. Some have decided to sell their property after the Carr Fire. This would further impede market values for property that has already been impacted by wildfire.

There are other more remote locations in Shasta County that are more suitable for such a commercial entity. I would be gravely upset if such a project was allowed in my neighborhood/vicinity.

Please do not allow this project to move forward.

Thank you for your efforts in seeking community feedback.


Sincerely,
Lynn E. Fritz
Redding Resident

FW: Crystal Creek Aggregate Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:16 PM

To: Bruce Grove <bgrove@shn-engr.com>

 1 attachments (210 KB)

Concerns about Crystal Creek Aggregate Signed.pdf;

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Larry Jordan

Sent: Thursday, March 18, 2021 11:14 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Crystal Creek Aggregate Expansion Project

I oppose the Crystal Creek Aggregate Expansion Project! Please see attached.

Larry Jordan

Keswick Resident's Concerns with the Crystal Creek Aggregate Expansion Project

To Whom It May Concern:

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics:

The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation.

The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night. The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality:

Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen².

There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few.

¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005

² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110

People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move.

Biological Resources:

The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts to California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources.

See additional biological resource concerns in the Hydrology and Water Quality section.

Energy:

Local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like manzanita and oak, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire.

Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials:

See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality:

The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter.

The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property.

The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few un-dammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the

Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³.

Land Use and Planning:

While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise:

Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest.

With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill.

While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation:

The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this

³ 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021

⁴ Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020

part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come too, primarily to get into the woods and enjoy the fresh air.

Transportation:

The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry.

The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

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Wildfire:

The local community has concerns about the new asphalt plans impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories:

The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes

⁵ Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020

4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶.

In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

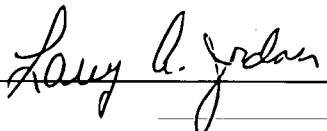
Conclusion:

The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry.

The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,
The Local Keswick Community

Name Larry A. Jordan

Signed 

Date March 18, 2021

⁶ Per conversations with Northstate and J.F. Shay asphalt plant operators, February 26th 2021

FW: Please stop the Proposed Keswick Westside Asphalt Plant expansion

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:19 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Janice H
Sent: Thursday, March 18, 2021 10:45 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Please stop the Proposed Keswick Westside Asphalt Plant expansion

I strongly oppose the expansion of the expansion project. I agree with the points presented by the community letter. I bike ride Iron Mountain Road and the surrounding trails, so I have a connection to this area and would hate to see it destroyed by the expansion project.

Please add my name to the community letter opposing the proposed Crystal Creek Aggregate Asphalt Plant Expansion Project.

Janice Hunter
2039 Sycamore Drive
Redding CA 96001

FW: Asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:22 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Teresa Muller

Sent: Thursday, March 18, 2021 10:23 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Asphalt plant

We live downwind from this potential plant. We are against the toxicity this plant will bring to our neighborhood and way of life. We are asking you to stop this permitting process to keep our area safe.

Bruce and Teresa Muller

10311 Newfound way

96001

8319152934

Sent from my iPhone

FW: Asphalt plant expansion

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:28 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Nancy Pernell
Sent: Thursday, March 18, 2021 10:11 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Asphalt plant expansion

Please add my name to the community letter opposing te proposed Crystal Creek aggregate Asphalt Plant Expansion. Many people have moved to this area for the quality of life. This project will greatly effect that quality.

Sincerely,
Nancy Pernell

FW: Oppose Keswick Westside Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:31 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Bob Madgic
Sent: Thursday, March 18, 2021 10:04 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Oppose Keswick Westside Asphalt Plant

My wife and I vehemently oppose the proposed Keswick Westside Asphalt Plant. Shasta County already had too many quarries and other installations that pollute our air. Stop any more of these polluting plants from being placed in this region. Our value is clean air, clean rivers, and outdoors recreation. The Keswick Westside Asphalt Plant would harm these qualities.

Bob and Diane Madgic
6412 Clear View Dr.
Anderson, CA 96007

FW: Crystal Creek Aggregate Asphalt Plant Extension

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:39 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Francesca Huntsman
Sent: Thursday, March 18, 2021 9:44 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Aggregate Asphalt Plant Extension

Dear Planning Division,

I am opposed to the expansion of the plant to include asphalt production/processing. This is the wrong place for this project. There are numerous reasons:

Aesthetically, the plant will be a plant on what is primarily a residential area, recovering and rebuilding as we all know from the Carr Fire. No one wants to hear, see, or smell the byproducts of an industrial process in their neighborhood.

The Bureau of Land Management has developed the recreation assets of this area with hiking and biking trails. Even though the fire burned through the landscape, hundreds of mountain bikers flood the area on all days of the week, weekends especially. The area is a gateway to the Sacramento River Trail, bringing kayakers, fishermen, boaters, walkers and bikers to the area. Highway 299 W heads to Whiskeytown Lake, but is only 2 miles from the proposed plant. All of these recreationists bring money to the Shasta County economy by purchasing recreational equipment locally, eating food locally and staying at our motels. Why diminish this positive contribution to our economy by placing an industrial zone so close to this area?

There are also negative environmental impacts on residents and neighbors who live adjacent to the area. Water quality has the potential to be impacted for both people, animals and the aquatic life in watersheds below the plant. As a reminder, a significant source of drinking water for the City of Redding is downstream from the plant and adjacent watersheds. This water source for all our Redding citizens is being currently remediated upstream by the Bureau of Reclamation at Spring Creek Reservoir. The water leaving the reservoir controls and treats contaminated runoff resulting from old mine tailings on Spring Creek, before entering the Sacramento River. Why undo these efforts with the potential for pollution from the asphalt plant? Air quality is a concern, the prevailing winds in this area blow out of the Northwest, any fumes/pollution produced will blow into West Redding and adjacent residential areas.

Finally, after the Carr Fire everyone in West Redding and Shasta is conscious of the ever present fire danger every summer and fall. Residents are more vigilant than ever about brush reduction. The area

can easily burn again, partially burnt trees remain with new growth appearing. Enough fuel remains for another fire to blow through again, no one wants to see the potential of burning propane and petroleum tanks added to this possibility.

Although community mental health is not a legal issue that can be addressed, I want to add that the residents of Shasta and West Redding have had enough trauma to last a lifetime as a result of the Carr Fire. Adding an asphalt plant that brings pollution, noise, and decreased property values to the area is unconscionable. I have an interest in these issues as a former resident of Shasta. I have numerous friends who lost their homes in this fire. I watched beautiful places I loved for recreation burn. Adding an asphalt plant extension to the quarry is adding insult to injury.

Respectfully,

Francesca Huntsman-Siemer

FW: Proposed Crystal Creek Asphalt Plant Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:41 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: James Pernell

Sent: Thursday, March 18, 2021 9:42 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Proposed Crystal Creek Asphalt Plant Expansion Project

Please add my name to the community letter opposing the proposed Crystal Creek Asphalt Plant Expansion Project. Thank you, James H. Pernell
15761 Old Stagecoach Rd.
Redding, Ca 9601

Sent from my iPhone

FW: beauty of Shasta co.

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:43 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Jane Elmore
Sent: Thursday, March 18, 2021 9:12 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: beauty of Shasta co.

While it is great that raw building materials abound.....it is up to people to protect watersheds and streams.
This plant would be better placed elsewhere.
Jane Elmore

FW: Proposed Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:47 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Susan Tescher
Sent: Thursday, March 18, 2021 8:56 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Proposed Asphalt Plant

3/18/21

I strongly oppose the proposed expansion of Crystal Creek Aggregate. This will absolutely destroy the environment of the area, including Keswick and the surrounding trails.

Susan Tescher
3030 Forest Hills Dr.
Redding, CA 96002

FW: Crystal Creek Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:49 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Kathy Grissom
Sent: Thursday, March 18, 2021 8:51 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Asphalt Plant

This letter is in support of the community letter opposing the asphalt plant in Keswick area.

There is no need for this plant.

Keswick has endured enough hardship. This is one more assault on them, and it is preventable.

I live on Balls Ferry Rd. and we tried to keep Tullis's gravel plant from opening and lost. Now we endure endless numbers of gravel trucks through our residential areas.

I'd like to see what the county would do if this were proposed in one of Redding's "rich" neighborhoods. This is a perfect example of a violation of economic justice.

Just say no.

Kathy Grissom
4788 Balls Ferry Rd.
Anderson, CA 96007

FW: Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:51 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Springseep
Sent: Thursday, March 18, 2021 8:47 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Asphalt Plant

To:
Tara Petti,
Shasta County Department of Resource Management
Planning Division
1855 Placer St. #103
Redding, CA 96001

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics: The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation. The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night.

The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality: Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood

stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen². There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few. ¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005 ² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110 People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move. Biological Resources:

The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts to California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources. See additional biological resource concerns in the Hydrology and Water Quality section.

Energy: Local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like manzanita and oak, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire. Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials: See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality: The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter. The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property. The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the

intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few un-dammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³. Land Use and Planning: While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise: Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest. With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill. While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation: The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this 3 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021 4 Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020 part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come too, primarily to get into the woods and enjoy the fresh air.

Transportation: The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry. The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue. Wildfire: The local community has concerns about the new asphalt plans impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories: The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes 5 Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020 4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶. In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion: The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry. The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,

The Local Keswick Community
and

Add Your Name _____ John Springer _____ Date ___ 3/18/21 _____

Your City or Community area: _____ Redding _____

6 -- *Per conversations with north state and J.F. Shay asphalt plant operators, February 26th 2021*

FW: Keswick Westside Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:54 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Linda Mitchell
Sent: Thursday, March 18, 2021 2:50 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Keswick Westside Asphalt Plant

This asphalt plant would create serious impacts on residents, wildlife, and the environment in Keswick, Old Shasta, and Westside trails and neighborhoods -- essentially anything downwind and downstream. Please do not allow this to go through!

Respectfully, Linda Mitchell

FW: Opposition to Keswick Plant Asphalt Expansion

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:59 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Janessa Gans Wilder
Sent: Thursday, March 18, 2021 2:36 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Opposition to Keswick Plant Asphalt Expansion

To Whom It May Concern:

I was born and raised in Redding and am now raising my children here. It was very disheartening to witness first-hand the destruction caused by the Carr Fire and continuing practice such as the wholesale clearing of land for the Salt Creek Heights development.

We can stop these practices and instead be stewards of the environment and caretakers of this land for our children and future generations.

There are many reasons, which have been thoroughly documented about the adverse impacts an expansion of the asphalt plant in Keswick would have on people and land, many of which are stated in the letter below. Please add my name to those opposing the expansion.

Sincerely,

Janessa Wilder

Community Letter:
Residents' Concerns with the Crystal Creek Aggregate Expansion Project

To:
Tara Petti,
Shasta County Department of Resource Management
Planning Division
1855 Placer St. #103
Redding, CA 96001

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

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The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

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have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire. Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials: See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality: The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter. The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property. The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few undammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³. Land Use and Planning: While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise: Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest. With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill. While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In

California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation: The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this 3 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226- Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021 4 Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020 part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come to, primarily to get into the woods and enjoy the fresh air.

Transportation: The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry. The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue. Wildfire: The local community has concerns about the new asphalt plans impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories: The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes 5 Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020 4,000ft away, the proposed plant with no additional treatment systems will have a

much bigger impact on homes only 1,000ft away⁶. In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion: The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry. The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,

The Local Keswick Community (and Add Your) Name _____ Date _____

Your City or Community area: _____

6 -- Per conversations with north state and J.F. Shay asphalt plant operators, February 26th 2021

FW: Crystal Creek Aggregate Proposal

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 3:00 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From:

Sent: Thursday, March 18, 2021 2:08 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Crystal Creek Aggregate Proposal

I do not want to see Crystal Creek Aggregate build an asphalt plant on Iron Mountain Road.

Asphalt fumes worsen respiratory ailments and cause other health issues. I have chronic lung problems. I have had to suffer with the recent fires which cannot always be prevented.

This project can be stopped from adding fumes to the air, and negatively impacting our water and recreational areas.

This project once in place will increase traffic along 299 West adversely affecting access to recreational areas and increase accidents.

Thank you for your attention.

Antoinette C. Perkins

FW: Crystal Creek Aggregate Asphalt Plant Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 3:30 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Laurie O'Connell <
Sent: Wednesday, March 17, 2021 9:31 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Aggregate Asphalt Plant Expansion Project

Dear Ms. Petti:

Please add my name to this community letter opposing the proposed Crystal Creek Aggregate Asphalt Plant Expansion Project"

This plant would be a huge source of air pollution in the area, releasing more pollution than many thousands of wood stoves, causing serious health problems in the community.

Concerns about noise and light pollution are also serious, and even worse, the negative impact on water quality and runoff quality in Crystal Creek would be yet another major risk factor for the community.

Local recreational opportunities would also bear a heavy negative impact from the noxious odors emitted by the plant, since the contiguous BLM land is widely used for recreation by hikers, as is the Middle creek and Sacto River Trails and Keswick Lake recreation area, all very close to the proposed plant.

Traffic will also be a major problem. The intersection of the Crystal creek Aggregate entrance and Iron Mt. Road is already a hazard, with lines of trucks backing up every weekday morning, and there is no more pavement on the entrance road, so trucks kick up gravel and dust from the quarry access road onto Iron Mt. Rd.

Our larger community already has three asphalt plants already causing problems for residents much farther than the neighborhoods that will be affected by the proposed plat. And these plants, despite their extra exhaust treatment systems, still draw complaints about noxious odors and air quality. The neighborhood nearest this proposed plant is far closer than these, and the proposed plant has no plan for any extra exhaust treatment capacity, so we already know what the result will be: unlivable conditions for the many citizens who will suffer from the grave dangers of even more severely polluted air dominating their neighborhood and the larger area.

Finally, with so much flammable material, the plant is a huge fire risk -- in an area that has already suffered major fires that are increasing every year.

Shasta County already has three asphalt plants that are causing trouble for our citizenry. PLEASE do not allow yet another to threaten our health, at even a more severe level due to increased proximity and minimal protective infrastructure or accommodations, for no reason other than making money for yet another corporation that clearly has no interest in our community's safety and quality of life.

Please don't allow this project to move forward, betraying the public trust for material gain for outsiders. The health of our community is at stake.

Sincerely,

Laurie O'Connell
30-year-resident

FW: Stop the Proposed Westside Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 3:31 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: tom morehouse
Sent: Thursday, March 18, 2021 12:34 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Stop the Proposed Westside Asphalt Plant

Hello Tara

After reviewing the information and letters forwarded to me concerning the proposed Keswick Westside Asphalt Plant I am opposed to this project. I believe the many negative effects including but not limited to increased truck traffic, hazardous air and water pollutants and their effects on the health of area residents and negative impact on the environment are very serious and should be the basis for rejecting this project. The short term and long term negative economic costs of this project will have on our area has to be seriously weighed against the projected economic benefits.

I am against this project!

Tom Morehouse
1415 Lear Way
Redding, CA 96001

FW: Crystal Creek Aggregate Asphalt Plant Proposal

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 3:34 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Sherry Gifford
Sent: Thursday, March 18, 2021 11:14 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Aggregate Asphalt Plant Proposal

In 2018, my home, rental property, land... everything I owned, was destroyed in the Carr Fire. It was a devastating blow. Hopefully, a once in a lifetime blow. Now, reading about the asphalt plant that is being proposed for this area, I feel an ominous fear taking root in my soul. We, the survivors of such a devastation that the Carr Fire placed on us, desperately need a peaceful and safe environment to live our lives. If this environmentally hazardous asphalt plant gains acceptance, we will be, again, at the mercy of extreme stress and anxiety, in our own homes, wishing we could escape. If the plant is allowed to pollute our neighborhood, we can kiss our property values goodbye. Don't allow a second major devastation to become a reality. Vote this monster down!
Sincerely, Sherry Gifford

FW: CCA asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 3:57 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Dana Silberstein
Sent: Thursday, March 18, 2021 3:43 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: CCA asphalt plant

This proposed project causes us, once again, to ask how much dangerous added pollution in the air is OK? Can you justify compromising a dozen kids with asthma? Fifty? How much dirtier can we make the rivers and still say it's all right? Maybe kill a quarter of the remaining fish? Half? What sacrifice is acceptable? Will all the added noise and lights only keep a few hundred people awake all night? A few thousand? How many will we turn our backs on?

How many trucks spewing dust would the owners or the commissioners or the supervisors like to have lumbering past their houses all night?

Do the CCA owners live in any of the surrounding area? We need to know if their lives will be permanently disrupted by this plant.

Thank you for addressing these questions as you consider this awful idea.

Dana Silberstein

FW: Keswick Westside Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 8:07 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Steven T Callan <stcallan@shasta.ca.us>
Sent: Friday, March 19, 2021 6:34 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Keswick Westside Asphalt Plant

My wife and I strongly oppose the Keswick Westside Asphalt Plant.

Steve and Kathy Callan

Steven T. Callan

FW: NO to the Crystal Creek Aggregate Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 8:09 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Jan
Sent: Friday, March 19, 2021 7:22 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: NO to the Crystal Creek Aggregate Expansion Project

This is not the time or place for another asphalt plant.

Please add my name to the community letter opposing the proposed Crystal Creek Aggregate Asphalt Plant Expansion Project.

I'm concerned for all the reasons stated.

Jan McEwen
1894 Del Mar Ave
Redding, CA 96003

FW: Asphalt NO - NO!

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 8:10 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Christian Gardinier <
Sent: Thursday, March 18, 2021 4:39 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Asphalt NO - NO!

· Please put me on the email list regarding this toxic infringement into my neighborhood!

FW: Attached Letter Concerns Crystal Creek Expansion

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 8:23 AM

To: Bruce Grove <bgrove@shn-engr.com>

1 attachments (22 KB)

Community Letter.docx;

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Tara Petti <tpetti@co.shasta.ca.us>
Sent: Friday, March 19, 2021 8:16 AM
To: Tara Petti <tpetti@co.shasta.ca.us>; Bruce Grove <bgrove@shn-engr.com>
Subject: Attached Letter Concerns Crystal Creek Expansion

Tara: I have attached a complete copy the letter of concern for the Crystal Creek Expansion Project with my added statement as presented below. Please feel free to use the Personal Comment, or the signed letter or both as you see fit.

Jeff Stephens

Personal Comment RE: Community Letter:
From: Jeffrey Stephens

Residents' Concerns with the Crystal Creek Aggregate Expansion Project

I am regular user of the area as described above and am acquainted with multiple other users and residents of the Iron Mountain Road region. I strongly object to the industrial development of the area of the type described by the Community Letter. I view this proposal as an opportunity for those in authority to take the long view of how a project like this impacts the quality of life for our residents and the generations that come long after we are gone. If it is in our best interest to promote new industry in Shasta County, then let us focus on clean sustainable industries that do not leave detrimental impacts to the quality of life for our citizens now and in the future. The Asphalt Plant Proposal is not one of those industries.

Signed BY:

Jeffrey Stephens

9781 Cow Creek Drive

Palo Cedro, CA

Community Letter:

Residents' Concerns with the Crystal Creek Aggregate Expansion Project

To:

Tara Petti,

Shasta County Department of Resource Management

Planning Division

1855 Placer St. #103

Redding, CA 96001

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics: The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation. The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night.

The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality: Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen². There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few. ¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005 ² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110 People also living in the area have been hospitalized

due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move. Biological Resources:

The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts to California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources. See additional biological resource concerns in the Hydrology and Water Quality section.

Energy: Local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like manzanita and oak, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire. Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials: See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality: The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter. The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property. The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few un-dammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³. Land Use and Planning: While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long,

the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise: Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest. With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill. While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation: The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this 3 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226- Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021 4 Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020 part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come too, primarily to get into the woods and enjoy the fresh air.

Transportation: The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry. The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will

prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue. Wildfire: The local community has concerns about the new asphalt plans impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories: The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes 5 Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020 4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶. In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion: The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry. The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,

The Local Keswick Community
and

Add Your Name Jeffrey Stephens Date 03-19-21

Your City or Community area: Palo Cedro, CA

Personal Comment RE: Community Letter:

Residents' Concerns with the Crystal Creek Aggregate Expansion Project

I am regular user of the area as described above and am acquainted with multiple other users and residents of the Iron Mountain Road region. I strongly object to the industrial development of the area of the type described by the Community Letter. I view this proposal as an opportunity for those in authority to take the long view of how a project like this impacts the quality of life for our residents and the generations that come long after we are gone. If it is in our best interest to promote new industry in Shasta County, then let us focus on clean sustainable industries that do not leave detrimental impacts to the quality of life for our citizens now and in the future. The Asphalt Plant Proposal is not one of those industries.

Signed BY:

Jeffrey Stephens
9781 Cow Creek Drive
Palo Cedro, CA

FW: Concerns about proposed Keswick Westside Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 8:36 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Christopher Rodriguez <
Sent: Friday, March 19, 2021 8:34 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Concerns about proposed Keswick Westside Asphalt Plant

Dear Tara Petti,

I'm concerned about the negative public health outcomes that are bound to arise if this project is completed. I fear not only for my many friends who live in Keswick, but also for the thousands of us who live downwind.

Thanks for your time,
Chris Rodriguez
Redding, CA 96003

FW: Suppose asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 9:06 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Marilyn Miller < >
Sent: Friday, March 19, 2021 9:05 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Suppose asphalt plant

Please add my name to the community letter opposing the Crystal Creek aggregate asphalt plant expansion project. Thank you, Marilyn Miller

[Sent from AT&T Yahoo Mail for iPhone](#)

FW: No to the Crystal Creek aggregate expansion project

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 10:26 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Rebecca Cileo <rebecca.cileo@shasta.ca.us>
Sent: Friday, March 19, 2021 9:16 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: No to the Crystal Creek aggregate expansion project

DEADLINE 3/22 - Please use your voice/fingers to make a difference!

Quick email response

To: tpetti@co.shasta.ca.us

Subject: NO to the Crystal Creek Aggregate Expansion Project

This is not the time or place for another asphalt plant.

Please add my name to the community letter opposing the proposed Crystal Creek Aggregate Asphalt Plant Expansion Project.

I'm concerned for all the reasons stated. Signed your name and address.

These issues hit home for me:

"Recreation: The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this 3 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226- Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021 4 Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020 part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come too, primarily to get into the woods and enjoy the fresh air. "

"The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. "

FW: asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 11:36 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Moira Casey <
Sent: Friday, March 19, 2021 11:09 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: asphalt plant

Good Morning, Tara

As a residence of Shasta, I am continually amazed at the attempts to "throw" developments to this area of Shasta County that take no consideration of the residents who already live here.

First a homeless village for over 100 people was proposed within a stone's throw of an elementary school with no thought that there are no services available in the area. No mass transit, no social service offices, no real retail outlets, not to mention that it is located on 299 a major artery for drug trafficking and distribution. The plan was dropped but I couldn't help feeling that this would have never been proposed for the Placer side of the west end within a stone's throw of Grant Elementary. Now an asphalt plant is being proposed. Please give this area of Shasta county a break. It's not as if the CARR Fire wasn't enough only to have the county keep viewing this area as one in which to locate facilities/operations that no one wants in their backyard. Again, I can't help but feel that this is not partially motivated by the fact that the Keswick/Shasta communities are not as universally "wealthy" as the Placer end a few miles away.

Please consider a more industrial appropriate location for an asphalt plant other than the Keswick area which is still trying to recover from the devastating fire. Don't add insult to injury. Surely in this large county there are locations that would not have as much impact on residential neighborhoods.

Thank you for listening.

Moira Casey

FW: Crystal Creek Aggregate Proposal

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 11:54 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From:

Sent: Friday, March 19, 2021 11:49 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Re: Crystal Creek Aggregate Proposal

I don't live right next door to Crystal Creek Aggregate, although several of my friends do. When I visit them, I'd hate to have to listen to and smell the 24 hour operation that is being proposed. I'd also hate for them to have to deal with that every day and every night.

I believe that there are even larger issues at play here, though. The major one is the environmental impact of an asphalt plant, especially with its nearness to Rock Creek and Middle Creek. These creeks flow directly into the Sacramento river, so any pollutants would be spread throughout Northern California. As a Redding resident since 1957, any more pollution is not welcome.

I am a mountain biker, have been since around 1980. As you know, tourism has been an important contributor to Shasta County's economy. Recently tourism has been enhanced by our many local trails. I've recently run into people from the Bay Area and Oregon who have come here to ride our trails. Our dirt is apparently superior to other places, especially in the winter when things get wet. These people are bringing money into our economy. There are several popular trails near the proposed facility (Trail 58 and the French Fry Trail) that would be negatively affected by a 24 hour operation with dust, fumes, and noise. The French Fry trail, in particular, is located around the proposed plant, in some places going very close to it. A few years back, the gravel quarry was expanded, causing the loss of a couple very nice mountain biking trails. I'd hate to see more trails lost or abandoned because of an obnoxious environment. (There was also an Indian cemetery located within the expansion area and I wonder if that's still there.) The increased truck traffic is also sure to discourage mountain bikers from using Iron Mountain road to travel between the trails.

I want to make sure that these issues are reviewed and studied in the upcoming environmental impact report. I believe that the impact to our county, both environmental and financial, far outweighs the need for this facility.

Thank you.

Mark D. Twitchell
339 River Park Dr.
Redding, CA 96003

FW: Scoping comments for Crystal Creek Aggregate Proposal

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 1:27 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Celeste White <
Sent: Friday, March 19, 2021 12:42 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Cc: Leonard Moty <lmoty@co.shasta.ca.us>; Shasta County BOS <shastacountybos@co.shasta.ca.us>
Subject: Scoping comments for Crystal Creek Aggregate Proposal

Dear Ms. Petti,

I have recently become aware of the following potential impacts of the CCA expansion and asphalt plant on tribal resources immediate to the project and wanted to voice my concerns.

- The Wintu Tribe conducts salmon harvesting on middle creek and represents recent cultural activities being conducted in the immediate projects area.
- The Tribal Salmon Rights are based upon the US Treaty signed with the Wintu Tribes on August 17, 1851
- The Winter Run chinook salmon that spawn in Middle Creek are listed in the federal ESA. The Short Nosed Sucker is also listed in the ESA.
- Other species potentially negatively impacted by degraded water quality from the development of an asphalt plant adjacent to Middle Creek are, the white and green sturgeon, the Spring Steelhead, the Sacramento Riffle Sculpin.
- The Salmon and Steelhead in the Sacramento River and Middle Creek, and all natural life in the Tribes territory are of significant ongoing cultural and spiritual value to the Wintu People
- There is also the potential for significant historical and prehistoric resource impact/destruction from the development and significant archaeological resource impact to archaeological resources in the area, and already listed on the NRHP

Thank you,
Celeste White

--

Celeste White

15812 Rock Creek Rd
Redding, CA. 96001

FW: Proposed Asphalt Plant in Keswick Scoping Comment

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 1:27 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Jeannine Gillan Vaughn
Sent: Friday, March 19, 2021 1:24 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Proposed Asphalt Plant in Keswick Scoping Comment

Greetings,

This email is a response to the proposed building of an asphalt production plant in the community of Keswick. My husband and I, as residents of West Redding, have a number of concerns:

Traffic Safety/increased volume of truck traffic on inadequate local roads.

Damage to local watersheds, particularly Middle Creek.

Increased air pollution and production of unpleasant smells. As an older couple with various medical issues we are worried that increased air pollution caused by this plant would further damage our health.

Noise and light pollution generated by the plant. We understand that it is proposed to operate 24 hours per day.

Reduction in property values in the immediate area and throughout West Redding. Our home is our biggest asset. Even a slight decrease in value would be economically damaging.

Thank you for your serious consideration of this important matter.

Jeannine Gillan and David Vaughn
4135 Boston Ave.
Redding, CA 96001

Jeannine

FW: Keswick Westside Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 1:39 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Mary Kaufman
Sent: Friday, March 19, 2021 1:35 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Keswick Westside Asphalt Plant

Dear Tera Petti,

As a local resident and a living breathing human being I am strongly opposed to the Keswick Westside Asphalt Plant.
Thank you for listening.

Best Regards,
Mary Kaufman

comments for CCA

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 3:23 PM

To: Bruce Grove <bgrove@shn-engr.com>

Call in Diane Turner: fumes, noise, vibrations and property values

Tara Petti

Associate Planner

Shasta County Department of Resource Management

Planning Division

1855 Placer Street Suite 103

Redding, CA. 96001

Department Main Line (530)225-5532

FW: Subscribe

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 4:21 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Lee Bunnell

Sent: Thursday, March 18, 2021 4:20 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Subscribe

I would like to receive e-mail notifications about Crystal Creek Aggregate Expansion Project.

Thank you,

Pat Bunnell

FW: Proposed Asphalt Plant - Keswick

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 9:36 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: A P Foster
Sent: Sunday, March 21, 2021 7:31 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Proposed Asphalt Plant - Keswick

Ms. Petti,

I would like to express my strongest opposition to the proposed asphalt plant at the Clear Creek Aggregate (CCA) property on Iron Mountain Road.

Following are my reasons for this opposition:

- As a homeowner living within 1.25 miles of the current operation, I enjoy long periods of quiet in a rural setting. Adding significantly to the industrial plant at CCA would detract immeasurably from my property value and the simple peace and quiet of my residence.
- As an active Public Land owner and avid trail user, both hiking and mountain biking, I have seen the relatively recent and significant expansion of the trail system on adjacent public lands (BLM) become a great asset to the Redding / Shasta County community. I have seen numbers of users increase dramatically since the Carr Fire. Again adding to this existing industrial plant would severely impact our ability to use and enjoy our public lands in the way they are intended.
- Current operations at CCA can now be heard from the Middle Creek and French Fry trails throughout the day. This significantly impacts the recreational and by extension the potential for economic gain to the community through tourism.
- I have very strong concerns about the air pollution discharge from the proposed plant. Having lived for several years as a child, near an oil refinery in Cheyenne Wyoming, I adamantly oppose the drastic increase in toxic hydrocarbon emissions from this proposed expansion. Emissions from wildfires in the area have likely already adversely impacted the future health of people, particularly children living in the area. This plant expansion would just add further insult to this situation.
- I travel SR 299 on a regular basis to and from Redding. Currently loaded trucks hauling rock and aggregate from CCA frequently do a slow roll through the stop sign at Iron Mountain Road and SR 299 to go eastbound. the pull

out into traffic requiring eastbound traffic already occupying the lane to brake to avoid collision. Adding additional truck traffic will no doubt cause an significant increase in injury and fatal crashes at this location.

- The underlying rock formation in the area is highly fractured, which has caused inordinate problems with subsurface runoff from the Iron Mountain Mine, about 3.75 miles away. I would be very interested to see a detailed analysis of potential runoff, both surface and sub-surface from the proposed expansion. I see this as a significant environmental concern which must be addressed.

Thank you for your consideration.

Respectfully,

Alan Foster

FW: Crystal Creek Aggregate expansion project

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 4:25 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Marci Fernandes
Sent: Friday, March 19, 2021 2:30 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Aggregate expansion project

I have lived in Keswick for over 20 years. This was my beautiful oasis until the Carr Fire took it all away. We have all been struggling to rebuild our homes and to get our properties back from a barren state of dead trees and eroding sand. Small trees are starting to grow back but meanwhile the wind is very severe with no surviving windbreaks throughout the canyons. I am very concerned that air pollution produced by an asphalt batch plant would carry far and wide. Also there are many creeks and springs in the area that would be in danger of pollution from runoff. This has already proven to be an unchecked consequence of the operation of the gravel quarry without involving toxic asphalt. The noise that would be produced from the plant as well as the trucks that go into and out of the plant would be extremely disruptive to the environment. I can already hear the loud noise from heavy equipment and blasting. Increasing that activity, along with the increased fire risk from an asphalt batch plant, will be a constant source of stress to our community. Our surroundings have already been devastated. Cyclists, boaters, and river trail hikers are all returning to the area. The constant odor and health risks produced by an asphalt batch plant will be a deterrent to the use of these amenities that Shasta County has invested in. I implore you to not allow this permit for the Crystal Creek Aggregate expansion project to go through. It would not only be devastating to our community, but detrimental to Shasta County's plans to promote recreation in the area.

Thank you,
Marci Fernandes.

FW: Scoping Comments re Crystal Creek Aggregate

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:08 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Tamra Plaga
Sent: Friday, March 19, 2021 5:22 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Scoping Comments re Crystal Creek Aggregate

Tara Petti, Associate Planner, Shasta County Department of Resource Management,
Planning Division

Email: tpetti@co.shasta.ca.us

Subject: Public EIR Scoping Comments for the Crystal Creek Aggregate Expansion Project (General Plan Amendment 19-0003, Zoning Plan Amendment 19-0002, Use Permit Amendment 19-0007, and Reclamation Plan Amendment 19-0001)

Ms. Petti:

This message submits scoping comments on the Environmental Impact Report (EIR) related to the Crystal Creek Aggregate Expansion Project being considered by Shasta County. As a resident of Shasta County and a survivor of the 2018 Carr Fire, I must express my concern regarding this proposed project. The community of Keswick has suffered from the destruction of the Carr Fire as well as from the residual effects of the resulting toxic ash. Now, there is a proposal to once again create a situation that will potentially increase pollution in that area, including light, noise, air and water pollution. This seems an unjust burden for the Keswick residents.

One of Shasta County's most valuable resources is its bounty of recreational opportunities. The Keswick area offers a plethora of resources for biking, equestrian sports, hiking, boating, fishing and just being close to nature. It thus supports the corresponding businesses whose livelihoods depend upon availability of these rich resources. Any type of environmental degradation threatens these businesses and also the attraction to Redding for folks who live, visit and pay taxes in the county.

Moreover, in October, an executive order signed by the governor directed state agencies to work toward protecting 30% of California's diversity of wildlife species by 2030. The order also set a goal to protect 30% of its lands and waters and to ensure access to nature for all residents. If approved, the expansion of Crystal Creek Aggregate could indeed move Shasta County backward from this goal. I look forward to

reading the completed EIR and learn how the result might improve and protect ecological diversity as well as support healthy land management practices and economic activities in our county.

Respectfully,

Tamra Plaga-Heagney

Constituent of District 2

FW: SEA Action Alert

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:17 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Darlene Cornett
Sent: Friday, March 19, 2021 9:06 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: SEA Action Alert

Please add my name to the community letter opposing the proposed Crystal Creek Aggregate Asphalt Plant Expansion Project"

Sincerely,

Darlene Cornett

FW:

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:18 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Gary Steddom
Sent: Saturday, March 20, 2021 6:58 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Fwd:

Date: March 20, 2021 at 6:39:55 AM PDT

Subject: Asphalt plant

Hi my name is Gary Steddom and I live on 11045 Sugar pine lane (rock creek rd) and I am opposed to asphalt plant being proposed on iron mtn rd. The possible smell and noise would be very annoying plus lower my property value. Sounds carry along way out here as I can hear the firing range up on Iron Mtn road. Please deny the permits.

Thank you

Gary
Sent from my iPad
With a Smile

FW: Proposed Asphalt Plant in Keswick

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:29 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Cheryl McKinley
Sent: Saturday, March 20, 2021 8:27 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Proposed Asphalt Plant in Keswick

Dear Ms Petti,

I am writing to express my horror at the idea of the proposed asphalt plant in the Keswick area. In addition to all the concerns expressed in the letter I have copied below, my initial thought was just extreme astonishment that this would even be considered! By anyone! That area was THE MOST HAZARDOUS AND HARD HIT AREA DURING THE CARR FIRE! How anyone could now consider doing even more damage to that area, to those residents, and to our whole community by even considering building such a toxic facility is beyond my comprehension.

PLEASE, do not even consider this proposal. It's completely ludicrous!

Cheryl McKinley
Retired teacher
Redding resident since 1980

Community Letter:
Residents' Concerns with the Crystal Creek Aggregate Expansion Project

To:
Tara Petti,
Shasta County Department of Resource Management
Planning Division
1855 Placer St. #103
Redding, CA 96001

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted

on Shasta County's website.

Aesthetics: The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation. The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night.

The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality: Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen². There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few. ¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005 ² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110 People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move. **Biological Resources:**

The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts to California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources. See additional biological resource concerns in the Hydrology and Water Quality section.

Energy: Local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like manzanita and oak, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety

valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire. Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials: See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality: The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter. The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property. The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few un-dammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³. **Land Use and Planning:** While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise: Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest. With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill. While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations

lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation: The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this 3 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021 4 Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020 part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come too, primarily to get into the woods and enjoy the fresh air.

Transportation: The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry. The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue. **Wildfire:** The local community has concerns about the new asphalt plans impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories: The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt

plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes 5 Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020 4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶. In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion: The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry. The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,

The Local Keswick Community
and

Cheryl McKinley 3/20/2021
Redding, CA

FW: Crystal Creek asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:30 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Richard Robinson
Sent: Saturday, March 20, 2021 10:45 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek asphalt plant

Hello

One of my concerns is notifications did not go out to all the areas that will be affected. While the county went beyond its usual 300 feet this project will affect an area for miles.

With prevailing winds from the north a big part of Swasey and Victoria highlands will be affected. Also the new subdivision of Salt Creek Highlands. The truck traffic will affect Keswick Dam Rd and all of Eureka way and downtown Redding.

Living less than one mile from the plant with all the trees burned off between us and the plant I am concerned about noise. Are noise studies being done for how far the noise will travel?

Toxic dust from Concrete crushing. Toxic fumes.

After the fire trying to fix up the yard with everything burned off we spent \$35,000 on cement and solar. I wanted to spend more time outside. The noise, smell and dust will make that investment worthless.

Richard and Claudia Robinson

FW: asphalt plant expansion

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:32 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: mark hansen
Sent: Saturday, March 20, 2021 10:56 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: asphalt plant expansion

Hello,
my name is mark hansen i live on trinity st in redding.

i am writing to object to the expansion of the asphalt plant off iron mountain road.

as a regular user of the bike trail that runs up to iron mountain road,
it seems to me, that if nothing else, it would impact my enjoyment of the trail
with foul odors from the hot tar.

there are of course, other more serious problems with such an expansion.
such as fouling of the creeks which are part of the sacramento river drainage.

thank you for your consideration.

mark w. hansen
1075 trinity st #110
redding, ca

FW: Proposed Asphalt Plant on Iron Mountain Rd

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:34 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Maja Sandberg
Sent: Saturday, March 20, 2021 12:38 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Proposed Asphalt Plant on Iron Mountain Rd

Ms. Petti,

The proposed quarry expansion and asphalt plant plan off Iron Mountain Road requires a thoughtful review process. I live and work on Redding's west side and I have work colleagues that live essentially across that road. Several of them already have serious respiratory issues which will only be exacerbated by this plant. They survived the Carr Fire, lived the last 18 months in a 5th wheel trailer, and have only just gotten back in a new manufactured home only to be faced with this new challenge. It might be time to consider not only what this means for them but also for the vicinity and Redding. Is an asphalt plant really appropriate for that setting? Probably not. It is too close to so many areas used for recreation, homes and families. Air Quality has to be an issue not to mention truck traffic. I ride my bike on those roads to and from the River/Rail Trail. Now asphalt trucks? Looks like an environmental study/use study would be most appropriate.

Sandberg, MD

Mountain Oak Dr

96001

Maja K

3365

Redding CA

FW: The Crystal Creek Aggregate Asphalt Plant Expansion

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:35 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Christopher Gray
Sent: Sunday, March 21, 2021 10:48 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: The Crystal Creek Aggregate Asphalt Plant Expansion

This plant expansion is so detrimental to the environment, residents, property values and trail users in multiple ways that it's appalling. It's equally appalling that so little notice was given that most people who learned of it did so by word of mouth. I'm not only opposed to this project, I'm now equally opposed to the city counsel who tried to sneak it through with minimal public awareness. This whole thing is despicable.

Sincerely, Kathryn Gray

FW: Public Comment: Crystal Creek Asphalt Plant expansion

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:38 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Melinda Brown
Sent: Sunday, March 21, 2021 11:22 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Public Comment: Crystal Creek Asphalt Plant expansion

*To: Tara Petti
Shasta County Resource Management Department
Planning Division
Re: Crystal Creek Asphalt Plant Permit*

I am opposed to permitting this plant for health reasons, for environmental impacts reasons; for degrading the recreational experience of westside trails which have had such a heavy public agency investment; and for the devastating effect it would have on the community of Keswick, and potentially Old Shasta, the Westside and anything else down wind. These impacts cannot be satisfactorily mitigated. In addition, there is no driving overriding societal need in our area for another asphalt plant as the local existing plants can meet current and projected needs.

Melinda Brown, Tilton Mine Road, Shasta County.

FW: Asphalt expansion project

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:40 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Jen McCloskey
Sent: Sunday, March 21, 2021 11:40 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Asphalt expansion project

Dear Tara,

We are hoping to put in our formal request to stop the asphalt expansion project near our brand new dream home in Land Park subdivision. When we purchased our ten acres of open space, we dreamed of enjoying the quiet beauty, the amazing wild life and the peaceful spot we prayerfully selected and were so blessed to have been chosen by the land owners to receive. This asphalt expansion would directly affect our lives and lifestyle. Not only would it make unbearable traffic noise in the most peaceful area of Redding, but that would carry straight up our canyon. And if you've ever smelled the toxic scent of asphalt, you would certainly never want to live near that. We are in the trades, so we understand business needs to happen. However, it's our hope it will not happen in our neighborhood. Thank you for your time

Homeowners on 4891 Ferrington Court. Redding
Tom and Jen McCloskey

FW: Proposed Keswick Westside Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:41 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Christopher Gray
Sent: Sunday, March 21, 2021 1:03 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Proposed Keswick Westside Asphalt Plant

Like many Redding area residents who have only recently learned of the proposed enlargement and 24 hour operation of the Keswick Westside Asphalt Plant, I am appalled that the Shasta County Dept. of Resource Management is considering permitting it. The negative impacts, including air, water, nonstop noise and light pollution, which will affect thousands of residents in the north valley area - not just on the west side, should be reason enough to deny the permit.

Sincerely, Christopher A. Gray

FW: Asphalt plant hand rock crusher

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:43 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Dan Bernet
Sent: Sunday, March 21, 2021 1:06 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Asphalt plant hand rock crusher

Dear Ms. Petti,

I am against the asphalt plant and the recycling of concrete.

I live on a hill that overlooks the current rock quarry. Since we are line of sight, we can hear the large equipment when they are mining. The addition of a rock crusher will significantly increase noise. We are down wind of asphalt fumes as is much of West Redding.

The existing rock quarry has been in place for many years, so I guess we are stuck with it. Housing has increased around the plant as Redding has grown on the west side. In my opinion, this is no longer an appropriate Development for this area.

Thank you,
Dan Bernet
15785 Highland Circle
Redding, CA 96001

FW: Residents' Concerns with the Crystal Creek Aggregate Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:44 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Lyra Gray
Sent: Sunday, March 21, 2021 1:25 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Residents' Concerns with the Crystal Creek Aggregate Expansion Project

To:
Tara Petti,
Shasta County Department of Resource Management
Planning Division
1855 Placer St. #103
Redding, CA 96001

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stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen². There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

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Energy: Local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like manzanita and oak, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire. Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials: See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality: The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter. The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property. The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the

intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few un-dammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³. Land Use and Planning: While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise: Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest. With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill. While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation: The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this 3 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021 4 Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020 part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come too, primarily to get into the woods and enjoy the fresh air.

Transportation: The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry. The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue. Wildfire: The local community has concerns about the new asphalt plants impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories: The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes 5 Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020 4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶. In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion: The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry. The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Please take these concerns seriously. The impact to our community would be catastrophic.

Sincerely,

The Local Keswick Community
and Lyra Gray of Redding, CA

FW: Scoping comments for Crystal Creek Aggregate Expansion

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:47 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From:

Sent: Sunday, March 21, 2021 3:32 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Scoping comments for Crystal Creek Aggregate Expansion

Dear Ms. Petti,

Here are my scoping comments for the Environmental Impact Report (EIR) for the proposed Crystal Creek Aggregate Expansion Project.

Air Quality

- Please disclose the specific toxic air contaminants that will be emitted from the asphalt plant and the health effects of these contaminants.. Please also disclose the process used to identify sensitive receptors, including distance from the asphalt plant.
- Please disclose the increase in airborne particulate matter, including both PM10 and PM 2.5, from the expansion of the aggregate operation and the health effects of particulate matter. Please also disclose the process used to identify sensitive receptors, including distance from the aggregate operation.

Noise

- Please disclose all sources of noise, including truck traffic, blasting, and equipment operation, from the aggregate operation and the asphalt plant. Please also disclose increases in noise from expansion of the aggregate operation over existing conditions. In addition, please disclose the hours (both day and night) during which noise will be audible and the process used to determine the distance from the two project components that noise will be audible.
- Please disclose vibration, if any, from project operations.
- Please disclose the impacts on wildlife from project-related noise.

Water Quality

- Please disclose the impacts of toxic substances in project-related runoff on area streams and the Sacramento River.

Transportation and Traffic

- Please disclose the number and hours of round-trip truck traffic as well as the specific routes that would be used. Please also disclose wear-and-tear impacts on area roads.

Cumulative Impacts

- Please disclose the cumulative impacts on water quality in area streams and the Sacramento River from the proposed project, Iron Mountain Mine, and the Carr Fire.

Thank you for the opportunity to submit scoping comments.

Kathryn McDonald
824 Yuba Street
Redding, CA 96001

FW: Proposed asphalt operation expansion

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 8:59 AM

To: Bruce Grove <bgrove@shn-engr.com>

📎 1 attachments (28 KB)

Asphalt plant concerns.pdf;

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Kent Manuel; Laura Manuel
Sent: Sunday, March 21, 2021 6:16 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Proposed asphalt operation expansion

Laura Christman Manuel
3945 Whitney Court
Redding, CA 96001

March 21, 2021

Tara Petti
Shasta County Department of Resource Management
Planning Division
1855 Placer St. #103
Redding, CA 96001

Dear Tara Petti,

I am writing in opposition to the proposed Crystal Creek Aggregate expansion project. There is a history of hurt in the hills of the Keswick area. Please consider the environmental devastation of the past — most recently the Carr Fire of 2018 and, more than 100 years ago, the copper smelting operations.

"Murder of a Landscape: The California Farmer-Smelter War 1897-1916" by Khaled J. Bloom is an important book for anyone who lives in and cares about Shasta County. Sulfur dioxide and other toxic fumes from the smelters hung to hillsides, killing trees, grasses and even weeds. Community leaders who should have protected our region refused to acknowledge the devastation, even as the smoke dissolved metal fences and window screens, killed centuries-old trees and triggered respiratory illnesses.

A San Francisco newspaper noted: "The people up there tolerate the fumes and the square miles of dead scrub pine very cheerfully because of the prosperity which attends the expenditure of so much money ..."

After extracting resources and profits, the companies left. The price tag for attempting to heal the denuded hills was left for the public. The scarred landscape was more prone to wildfires. So one disaster piled onto another.

This story of chasing prosperity and leaving behind environmental ruins is one we should learn from, not repeat. And yet ...

The asphalt project seems to be following a similar narrative. Resources are extracted, a few folks profit and there is much damage for everyone else. The expansion would add harmful pollutants to the air, increase truck traffic on a twisting two-lane country road not designed for such traffic and be a threat to a popular recreation spot. The public trails in this area are a treasure for our region.

Many more serious impacts have been outlined in the community letter opposing the proposed Crystal Creek Aggregate Asphalt Plant Expansion Project. Please add my name to that letter.

Thank you for your careful consideration of this project.

Sincerely,
Laura Christman Manuel

Laura Christman Manuel
3945 Whitney Court
Redding, CA 96001

March 21, 2021

Tara Petti
Shasta County Department of Resource Management
Planning Division
1855 Placer St. #103
Redding, CA 96001

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Many more serious impacts have been outlined in the community letter opposing the proposed Crystal Creek Aggregate Asphalt Plant Expansion Project. Please add my name to that letter.

Thank you for your careful consideration of this project.

Sincerely,
Laura Christman Manuel

FW: Proposed Keswick Asphalt Plant Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 9:00 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From:

Sent: Sunday, March 21, 2021 6:31 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Proposed Keswick Asphalt Plant Expansion Project

Ms. Petti -

I won't occupy more of your time than necessary, as I am sure you are hearing from a number of individuals regarding the proposed Keswick Asphalt Plant Expansion Project.

PLEASE!!!! This project MUST NOT TAKE PLACE!!! It will completely destroy the Keswick area. The environmental impact will be disastrous.

Haven't the residents of Keswick suffered enough?

Thank you for your time and consideration.

Beverly Simone
330 Lemon Drive
Redding, CA 96003

FW: Subscribe

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 9:29 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Jen

Sent: Sunday, March 21, 2021 6:38 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Subscribe

Tara Petti, Associate Planner
Shasta County Department of Resource Management,
Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001

Dear Ms. Petti,

I am very concerned of the **long-term major adverse and irreversible impacts** that the Crystal Creek Aggregate Inc. expansion would have on the communities of Shasta and Keswick. This action, taken on behalf of Shasta County, would add insult to injury for a community that needs to recover from wildfire and that has the ability to become a thriving residential community intermixed between National Park, Bureau of Land Management, and State Park recreational lands. This is an area, if carefully planned, could provide outdoor recreational opportunities for the local community and serve as a destination for visitors, if planned well.

Light Pollution: The proposed 24-hour operation of the plant, would have long-term and major adverse impacts on light pollution to the local community, State Park, Bureau of Land Management and National Park lands – all of which are within a 20 mile radius of the plant. The EIR has already identified light pollution as an issue, with the mitigation of lights that don't let light escape upwards will be installed. This is not a helpful mitigation measure as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation. The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night. All of which would have a long-term adverse and major impact

on the star gazers that enjoy the night sky at Whiskeytown National Recreation Area, where the Night Sky Program views and environments are among the critical park features the National Park Service protects. Night sky protection enhances qualities of solitude and undeveloped wilderness character that animals depend on for survival, park visitors seek for connections, and many cultural-historical parks require for preservation. In this regard, the NPS recognizes a naturally dark night sky as more than a scenic canvas; it is part of a complex ecosystem that supports both natural and cultural resources. Many community members enjoy going up to South Fork Mountain and the Shasta Divide for evening walks and to enjoy the night sky and look out over the community of Redding, including the Sun Dial Bridge, which casts a lovely artistic glow over the Sacramento River. The lights and sounds from a 24-hour operation – in direct view of this National Park land – would have an overall adverse impact on the experience.

Also, the permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day. This action would have a long-term adverse impact on light pollution for the local community and surrounding recreation lands.

Air Quality: Additionally, and more significantly, the local residents of Shasta and Keswick are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen². There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main “smell” component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects. Again, with increased trails and recreation within the area, people riding mountain bikes, hiking, and enjoying the surrounding State Park and Department of Interior lands would be increasingly exposed to such activities.

Due to the quarry’s location, the wind in Shasta is usually stronger than the rest of the Redding Valley – mostly in the mornings and evenings. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few. ¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005 ² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110. People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people’s lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move.

Wildfire: Also, local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like chaparral and knobcone pine, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode

propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire. Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Water Quality: In regards to water quality, the surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter. The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property. The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

Threatened and Endangered Species: The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few un-dammed tributaries to the Sacramento River in the Redding area. Central Valley Steelhead is a Federally Threatened species with several millions of dollars already invested into recovering the species. Any sediment from the quarry that is not captured by the settling ponds will make its way into the Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon.

Pacific fisher is a species of concern in Shasta Count and I have personally caught a few on my wildlife game camera in Shasta. This species would undoubtedly be impacted by noise, light, and traffic within the area because of the proposed actions.

Land Use and Planning: While the EIR is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Allowing Crystal Creek to build an asphalt plant would have a long-term adverse and major impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. Bird surveys conducted 20 miles away have been interrupted by the sound of this plant. Even in consideration that both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also

at night when ambient noise levels are at their lowest – impacting all of the surrounding residents and recreational areas. With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill. While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation: The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation, as well as nearby State Park land and Whiskeytown National Recreation Area. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Also, there is the paved Middle Creek and Sacramento River trails – which connects to the Sun Dial Bridge. There is also the Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this 3 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021 4 Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020 part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source and light pollution – let alone impact air quality for all of those seeking to enjoy the outdoors.

Transportation and Safety: The EIR has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry. The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing. The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue.

Additionally, slow gravel trucks pulling out onto Highway 299 to head East at Rock Creek and Iron Mountain Mine, have not been able to move fast enough for oncoming traffic. There is a passing lane going uphill at this location – on a curve – right where trucks pull out to head downhill and they are often not fast enough to anticipate the traffic heading uphill and are focused on passing one another. These are both locations of frequent accidents on Highway 299. Having increased truck traffic at these locations is a HUGE concern for people planning to head to the coast, or Shasta State Park, or

Whiskeytown Lake on a busy weekend. The safest option would be to install a traffic light at one of these intersections to ensure safety, which would require concurrence and support from Caltrans.

Concerns not fitting into the above categories: The community has a couple of other concerns that do not fit nicely into the above EIR categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes 5 Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020 4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶. In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Additionally, before the Carr Fire, Caltrans and the neighboring land management agencies and community were exploring opportunities to expand recreation in this area and to connect Redding's trails with Shasta State Historic Park, Bureau of Land Management, and National Park lands. This was a time when the local community was very excited about making improvements for a healthier community and to make visitation and travel more enticing. A new 24-hour asphalt plant instead of new trails, more open space, and well designed and fire safe-home is a big disappointment and would have an long term adverse consequence overall on the community and the County.

Conclusion: The above is a list of concerns the local community and I have about the proposed expansion project. The proposed actions would have long-term major and adverse impacts to the local community, surrounding State Park and Department of Interior lands, in terms of noise and light pollution, safety and traffic, and air quality – and overall quality of life for those that live near the plant. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

There is so much opportunity to expand on the recreational opportunities in Shasta and Keswick – especially because these areas reside between Bureau of Land Management, State Park and National Park lands. This is an area for Shasta County to carefully plan a new community for making a healthier community, with hiking and bike trails, open space, clean air, and vistas of the city of Redding. The

concept of expanding an asphalt plant in this area to a 24-hour operation is just...insult to injury. The County has a golden opportunity to make this a destination for visitors wanting to enjoy outdoor recreation and an asphalt plant would lower the quality of living for existing resident, impact surround land management agencies, and squash recreational experience and opportunities for the future. When I read the EIR, I kept thinking to myself, "why would the County even consider this?"

Sincerely,

Jennifer Gibson
10760 High Street
Shasta, California 96087

FW: Asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 9:31 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Diane Dobbins <

Sent: Sunday, March 21, 2021 6:39 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Asphalt plant

I want to add my name in opposition to the proposed establishment of an asphalt plant in Keswick. The innumerable environmental hazards that this proposed plant would engender just boggle my mind. We moved to Shasta County to avail ourselves of clean air, water and land - and this would be a tremendous downside to anyone thinking of making Shasta County their home. While we need to be able to attract an array of health care providers, this is absolutely the wrong decision to make.

Sincerely,

Diane Dobbins, Retired RN

FW: Crystal Creek Aggregate Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 9:33 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Jeannette Logue ·
Sent: Sunday, March 21, 2021 7:26 PM
To: Tara Petti <tpetti@co.shasta.ca.us>; Clerk of the Board Mailbox <ClerkoftheBoard@co.shasta.ca.us>
Subject: Crystal Creek Aggregate Expansion Project

Dear Ms. Petti,

I am writing in strong opposition to the proposed Keswick Westside Asphalt Plant. You have received a lengthy and detailed community letter, also objecting to this plant, and I am in agreement with all points made.

It is very dispiriting to see that there are still people and businesses that have zero regard for the health of people who live and work in this region, and for the bountiful wildlife including plants that are so important to those of us who live here.

This county has a heavy economic reliance on people who come here on holiday and vacations to enjoy our much cleaner air, water, and living things. I do not think that an ecologically unsound and unhealthy asphalt plant will do anything to stimulate the growth of tourism, the interest of new business development, and future retirees who are considering a move to a lovely California county with clean air and an interest in the physical health of its residents.

You would think that even after so many decades, the elected officials in this county would remember the devastation caused by earlier irresponsible businesses in this area, including mining. There will be nothing beneficial to Shasta County arising from this plant, only to the owners of the operation, for a while. We will live with its outcomes forever.

Jeannette Logue

FW: Opposition - Crystal Creek Aggregate Asphalt Plant Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 9:48 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Muffy Berryhill ·
Sent: Sunday, March 21, 2021 8:12 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Opposition - Crystal Creek Aggregate Asphalt Plant Expansion Project

To:
Tara Petti
Shasta County Department of Resource Management
Planning Division

I am writing in opposition to the proposed Crystal Creek Aggregate Asphalt Plant Expansion Project. For nearly twenty years I have been a frequent user of the recreational trails and resources in the Keswick area. After reviewing the related Environmental Initial Study, I believe the project will create:

- negative public health outcomes
- negative environmental impacts
- negative impacts for area residents and recreational users - impacts both on quality of life and safety
- increased wildfire danger in this high fire severity zone

Please keep me informed of this project as it makes its way through the planning and permit process.

Thank you,

Muffy Berryhill

1992 Kildare Drive
Redding, CA 96001

FW: Oppose: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 9:52 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Roy Berlinghoff

Sent: Sunday, March 21, 2021 11:41 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Oppose: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

21 March, 2021

TO: Tara Petti

FROM: Roy Berlinghoff

Shasta County Dept. of Resource Mgt.

16290 Laurie Ann Lane

Planning Division

Redding, CA 96001

1855 Placer St. #103

Redding, CA 96001

RE: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

Ms. Petti

I write you today to express my concerns as well as to register my name amongst my many neighbors and other members of the Shasta County community who are against Shasta County's permitting the expansion of the property operated by Crystal Creek Aggregate to include an Asphalt Processing Plant, or Asphalt Plant of any kind as per above noted Use Permit Amendment and Reclamation Plan Amendment.

My family has resided on the property due east of Crystal Creek Aggregate (hereinafter: "CCA") since 1993 and participated in recreational activities in this area since 1983. We have enjoyed the pristine foothills and good air quality since our first excursions into this region, from tobogganing down the hill west of our current property to bicycling and hiking the many trails nearby. We moved to Shasta County because it is a close-knit community that offers so much more than the larger cities outside of our region could ever offer.

We were aware that CCA was in operation when we moved to Keswick and while we consider the company to have been a good neighbor overall, even as we have tolerated over the years the nuisances that come with living near a quarry, from the dust, explosions from blasting, moderate truck traffic, etc. With that, it has been sad to see the foothills disappearing as time has passed by over these almost 30 years as the extreme excavation of the hillsides takes its toll.

We have now reached another threshold with the advent of CCA wishing to expand into the generation and movement of freshly processed asphalt. In my past occupation I have worked in a variety of cities far beyond Shasta County and had to work in areas that were close to asphalt plants. I can personally attest to the repugnant odors that emit from asphalt plants; the odors are terrible. The thought of a new asphalt plant being built in my back yard is abhorrent. A review of a significant number of documents that address asphalt generation plants, there are several elements that greatly disturb and concern me.

First is information provided by The Environmental Protection Agency (EPA), which has noted that, "Asphalt processing and asphalt roofing manufacturing facilities are major sources of hazardous air pollutants such as formaldehyde, hexane, phenol, polycyclic organic matter, and toluene. Exposure to these air toxins may cause cancer, central nervous system problems, liver damage, respiratory problems and skin irritation."

As I noted earlier, even with some issues that have been troublesome in the past, we have overall considered CCA a good neighbor. Unfortunately, as we enter this new situation, we have to all agree that when a company plans to make something right in our back yard that generates toxic fumes and substances, along with what is very likely to be noise pollution, increased vehicular (heavy truck) traffic which will often extend into all hours of day and night, that is going too far. My husband was recently diagnosed with cancer, and one of our close neighbors is currently undergoing cancer treatment. I cannot imagine that allowing an asphalt plant that will lift cancer-causing elements into the air we breathe and into streams of the water we drink and fish in to be a good thing. Add to these facts that an asphalt plant will absolutely cause my property values and those of others in this area to be greatly reduced and you must see that it is time to take a stand against such a development. CCA's proposal has crossed a line that, should an asphalt plant be approved, will absolutely compromise the quality of my life, my family's lives and the lives of all my neighbors.

Myself, my husband and all of my neighbors and our local community are all strongly against the proposed addition of a new asphalt plant within the existing quarry. We are concerned that the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and

noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects.

The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. We are living proof of the tragic events of the Carr Fire as we lost our home and over 40 years of heirlooms from our immediate family and 100+ year old heirlooms that came to America with members of our ancestors. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

In closing, below is a master list of concerns that must be addressed:

- Air pollution from asphalt plant operations
- Water pollution from asphalt plant operations
- Air pollution from loading and transport of asphalt (“fugitive emissions”)
- Air pollution from storage of asphalt and any other toxic materials (also “fugitive emissions”)
- Air pollution from number of diesel trucks coming, going, idling
- Air and water pollution from quarry activities, crushing concrete
- Sediment issues in drainages, creeks, streams, river
- Water pollution that derives from the loading and transport, storage of materials, and truck traffic
- Light pollution from night operation
- Noise pollution from running of asphalt plant, blasting, and truck traffic
- Noise pollution particularly at night
- Noise pollution from blasting
- Health concerns from asphalt plant and quarry activities
- Truck traffic congestion for residents and recreators
- Safety concerns from truck traffic
- School bus
- Property values
- Impact on bicyclists, motorcyclists, vintage car enthusiasts
- Salmon fishing rights for Wintu tribe
- Salmon and steelhead spawning grounds
- Quality of life
- Wind carrying fumes – how far?
- Fire safety – asphalt and the materials used to make it very flammable
- 9 acres of “non-jurisdictional water” claimed but not clear whether this water is non-jurisdictional
- Aesthetics of area
- Ability of county to attract clean industry and tourism

- Oversight
- Prior history of violations

Should you have any questions or require any follow up, please contact me by cellular phone at

Sincerely,

Roy Berlinghoff

FW: Community Letter: Roy Berlinghoff

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 9:52 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Roy Berlinghoff
Sent: Sunday, March 21, 2021 11:45 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Community Letter: Roy Berlinghoff

21 March, 2021

Community Letter:

Residents' Concerns with the Crystal Creek Aggregate Expansion Project

To:

Tara Petti,
Shasta County Department of Resource Management
Planning Division
1855 Placer St. #103
Redding, CA 96001

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics: The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation. The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night.

The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality: Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen². There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few. ¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005 ² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110 People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move. **Biological Resources:**

The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts to California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources. See additional biological resource concerns in the Hydrology and Water Quality section.

Energy: Local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like manzanita and oak, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire. Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials: See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality: The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter. The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property. The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few undammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³. Land Use and Planning: While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise: Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest. With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill. While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is

concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation: The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this 3 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021 4 Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020 part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come too, primarily to get into the woods and enjoy the fresh air.

Transportation: The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry. The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue.

Wildfire: The local community has concerns about the new asphalt plants impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories: The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes 5 Pavement Engineering, Chapter 600, Highway

Design Manual, Caltrans, December 31, 2020 4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶. In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion: The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry. The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,

The Local Keswick Community

and

Roy Berlinghoff Date 03/21/2021

16290 Laurie Ann Ln. Redding, CA 96001

FW: Community Letter: Leanne Berlinghoff

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 9:53 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Leanne Berlinghoff
Sent: Sunday, March 21, 2021 11:53 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Community Letter: Leanne Berlinghoff

21 March, 2021

Community Letter:

Residents' Concerns with the Crystal Creek Aggregate Expansion Project

To:
Tara Petti,
Shasta County Department of Resource Management
Planning Division
1855 Placer St. #103
Redding, CA 96001

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics: The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation. The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night.

The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality: Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen². There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few. ¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005 ² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110 People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move. **Biological Resources:**

The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts to California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources. See additional biological resource concerns in the Hydrology and Water Quality section.

Energy: Local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like manzanita and oak, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire. Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials: See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality: The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter. The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property. The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few undammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³. Land Use and Planning: While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise: Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest. With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill. While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is

concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation: The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this 3 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021 4 Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020 part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come too, primarily to get into the woods and enjoy the fresh air.

Transportation: The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry. The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue.

Wildfire: The local community has concerns about the new asphalt plants impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories: The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes 5 Pavement Engineering, Chapter 600, Highway

Design Manual, Caltrans, December 31, 2020 4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶. In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion: The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry. The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,

The Local Keswick Community

and

Leanne Berlinghoff Date 03/21/2021

16290 Laurie Ann Ln. Redding, CA 96001

FW: Oppose Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 9:54 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Leanne Berlinghoff
Sent: Sunday, March 21, 2021 11:56 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: RE: Oppose Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

21 March, 2021

TO: Tara Petti

Shasta County Dept. of Resource Mgt.

Planning Division

1855 Placer St. #103

Redding, CA 96001

FROM: Leanne Berlinghoff

16290 Laurie Ann Lane

Redding, CA 96001

RE: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

Ms. Petti

I write you today to express my concerns as well as to register my name amongst my many neighbors and other members of the Shasta County community who are against Shasta County's permitting the expansion of the property operated by Crystal Creek Aggregate to include an Asphalt Processing Plant, or Asphalt Plant of any kind as per above noted Use Permit Amendment and Reclamation Plan Amendment.

My family has resided on the property due east of Crystal Creek Aggregate (hereinafter: "CCA") since 1993 and participated in recreational activities in this area since 1983. We have

enjoyed the pristine foothills and good air quality since our first excursions into this region, from tobogganing down the hill west of our current property to bicycling and hiking the many trails nearby. We moved to Shasta County because it is a close-knit community that offers so much more than the larger cities outside of our region could ever offer.

We were aware that CCA was in operation when we moved to Keswick and while we consider the company to have been a good neighbor overall, even as we have tolerated over the years the nuisances that come with living near a quarry, from the dust, explosions from blasting, moderate truck traffic, etc. With that, it has been sad to see the foothills disappearing as time has passed by over these almost 30 years as the extreme excavation of the hillsides takes its toll.

We have now reached another threshold with the advent of CCA wishing to expand into the generation and movement of freshly processed asphalt. My husband's occupation has caused him to have to work in areas that have been in close proximity to asphalt plants, and when I have visited him in these out of town locations, the putrid smell of asphalt generation has made me feel ill. Now just the thought of a new plant being built in my back yard is abhorrent. As I have reviewed a significant number of documents that address asphalt generation plants, there are several elements that greatly disturb and concern me.

First is information provided by The Environmental Protection Agency (EPA), which has noted that, "Asphalt processing and asphalt roofing manufacturing facilities are major sources of hazardous air pollutants such as formaldehyde, hexane, phenol, polycyclic organic matter, and toluene. Exposure to these air toxins may cause cancer, central nervous system problems, liver damage, respiratory problems and skin irritation."

As I noted earlier, even with some issues that have been troublesome in the past, we have overall considered CCA a good neighbor. Unfortunately, as we enter this new situation, we have to all agree that when a company plans to make something right in our back yard that generates toxic fumes and substances, along with what is very likely to be noise pollution, increased vehicular (heavy truck) traffic which will often extend into all hours of day and night, that is going too far. My husband was recently diagnosed with cancer, and one of our close neighbors is currently undergoing cancer treatment. I cannot imagine that allowing an asphalt plant that will lift cancer-causing elements into the air we breathe and into streams of the water we drink and fish in to be a good thing. Add to these facts that an asphalt plant will absolutely cause my property values and those of others in this area to be greatly reduced and you must see that it is time to take a stand against such a development. CCA's proposal has crossed a line that, should an asphalt plant be approved, will absolutely compromise the quality of my life, my family's lives and the lives of all my neighbors.

Myself, my husband and all of my neighbors and our local community are all strongly against the proposed addition of a new asphalt plant within the existing quarry. We are concerned that the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the

local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects.

The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. We are living proof of the tragic events of the Carr Fire as we lost our home and over 40 years of heirlooms from our immediate family and 100+ year old heirlooms that came to America with members of our ancestors. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

In closing, below is a master list of concerns that must be addressed:

- Air pollution from asphalt plant operations
- Water pollution from asphalt plant operations
- Air pollution from loading and transport of asphalt (“fugitive emissions”)
- Air pollution from storage of asphalt and any other toxic materials (also “fugitive emissions”)
- Air pollution from number of diesel trucks coming, going, idling
- Air and water pollution from quarry activities, crushing concrete
- Sediment issues in drainages, creeks, streams, river
- Water pollution that derives from the loading and transport, storage of materials, and truck traffic
- Light pollution from night operation
- Noise pollution from running of asphalt plant, blasting, and truck traffic
- Noise pollution particularly at night
- Noise pollution from blasting
- Health concerns from asphalt plant and quarry activities
- Truck traffic congestion for residents and recreators
- Safety concerns from truck traffic
- School bus
- Property values
- Impact on bicyclists, motorcyclists, vintage car enthusiasts
- Salmon fishing rights for Wintu tribe
- Salmon and steelhead spawning grounds
- Quality of life
- Wind carrying fumes – how far?
- Fire safety – asphalt and the materials used to make it very flammable
- 9 acres of “non-jurisdictional water” claimed but not clear whether this water is non-jurisdictional
- Aesthetics of area
- Ability of county to attract clean industry and tourism
- Oversight

- Prior history of violations

Should you have any questions or require any further explanation, please feel confident to reach me by cellular phone at (530) 524-6529.

Sincerely,

Leanne Berlinghoff

March 21, 2021

TO: Tara Petti, Associate Planner, Shasta County Department of Resource Management, Planning Division

FROM: Kristy Ortega, 11052 Iron Mountain Road, Redding, CA 96001

RE: Scoping Questions and Comments, Crystal Creek Aggregate Expansion Project

1. How would the light from the plant operation be mitigated so that neighboring residential homes do not have bright lights creating light pollution in their homes during evening and night time hours?
2. The initial impact report stated that "The project could potentially result in air emissions which would create objectionable odors affecting a substantial number of people." Will everyone living within a quarter mile have to smell the chemicals from the plant throughout their days? People living within a half mile or mile? Will this smell permeate our clothing if we line dry our clothes?
3. Sulphur dioxide emissions are one of the emissions released by this type of production. Will the vegetable gardens and fruit trees of neighboring homes be impacted by the toxins in the air from production? Will pollinator insect populations be adversely affected by the increased light pollution or increased air pollutants and affect the gardens of nearby residents?
4. How will emissions from the plant exacerbate respiratory conditions, such as asthma or copd, which may affect the residents living near the operation?
5. How will the chemicals used in the operation, or will emissions or waste byproduct pose any fire hazard to the surrounding homes and returning vegetation?

6. How will the chemicals used in the operation, emissions or waste byproduct pose a risk to the physical health of humans or animals living close to the operation? Lung damage? Increased risk of cancers?
7. Does the operation pose any concern for the Endangered Valley Elderberry Longhorn Beetle, whose habitat was suspected to include the area where CCA is located in 2017?
8. How will the expansion of the operation and chemicals used, emissions, or waste byproduct have an adverse effect on the regrowth of native vegetation in the area? Will the emissions stunt the regrowth of Toyon, Manzanita, Oak, or other vegetation?
9. How will the chemicals used, emissions or waste byproduct affect the health of the creeks draining into the Sacramento River? Middle Creek and Rock Creek?
10. How will this operation and the side effects from chemicals, emissions, waste byproduct or run off affect Salmon spawning in Middle Creek? Would it affect the Trout in those waterways?
11. How could this operation impact Salmon Tribal Rights for the local Wintu tribe? How will the operation impact the harvesting of Salmon?
12. What is the potential negative impact by degraded water quality from the development of an asphalt plant adjacent to Middle Creek are, the white and green sturgeon, the Spring Steelhead, the Sacramento Riffle Sculpin?
13. How will this operation have a negative effect on the local watersheds?
14. How will this operation affect local wetland areas?
15. How will this operation affect the birds that use the wetland areas? Bird migratory patterns? Bird breeding and nesting habitats?

16. What “substantial adverse change” to archeological and historical resources would take place?
17. How will the increased hours of operation create not only increased light pollution, but noise pollution, too? How will this be studied and measured and what levels are determined not to be a nuisance to resident’s quality of life?
18. Can CCA provide a list of all toxic chemicals that would be stored and used on site?
19. Given the proximity of the proposed plant to adjacent homes: There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatment systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes 4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000 ft away. How will CCA mitigate the potential hazards and negative impacts on homes that are only 1,000 ft away from their operation without these treatment systems in place? Even with these treatment systems in place, given the close proximity, would they mitigate the negative impacts on the air quality enough to not be hazards for residents living only 1,000 feet away from the operation?

20. What is the potential for the increased noise pollution to further add to the toxic stress experienced by residents/victims of the Carr Fire? With 24 hour operations, how would the noise and the light impact the residents' living within 1,000 feet ability to sleep well to maintain good physical and mental health? How may it impact the cardiovascular systems of those living nearby, a system which is adversely affected by chronic stress factors; or mental health conditions such as depression and anxiety, which can be impacted by poor sleep. Poor sleep results from stressors such as noise and light pollution during the body's natural resting hours.
21. How will the county test the ponds on CCA grounds and the nearby streams and creeks for hazards and dust and particulate matter amounts settling in and running off from the water systems on CCA grounds?
22. How will the county test for crystalline silica dust particulates in the air on CCA site and in the surrounding residential areas?
23. Will mitigation efforts, to keep toxic chemicals and dust particulates from traveling to homes 1,000 feet away from operations result in additional noise and or light pollution, on top of the everyday increased plant operations?
24. How will CCA ensure that they are not contributing to the decline in local insect populations, and how will an environmentally acceptable percentage be determined? Who will review and assess the validity of this determination?
25. Asphalt is flammable and the process of manufacturing and mixing the materials poses a fire hazard. There is a shooting range on Iron Mountain Road that experiences at least one fire per fire season. This places another fire hazard on the other side of residences on Iron Mountain Road. Will additional fire breaks and mitigation efforts be added to reduce risk of increased fire danger as a result of plant operations? Will the increased fire danger increase the cost of home and property insurance impacting the quality of life for those living in the 1,000 foot or wider circumference area?

26. How will the increase in truck traffic be expected to impact other vehicles (Car and Bicycle) on Iron Mountain Road, and Highway 299? How will it impact school bus routes and times? How will this be studied? Will a stop light be needed at the intersection of 299 and Iron Mountain, to help manage the increase in trucks leaving from that intersection? How will this be studied? Will the current 45 MPH speed limit along most of Iron Mountain Road be safe with increased truck traffic? How will this be studied? Will the road conditions need increased maintenance due to increased truck traffic on Iron Mountain Road? When there is construction along Hwy 299W, the wait times can be very long, and it can impact the intersection of 299 and Iron Mountain Road. How will the increased truck traffic potentially further impact road construction conditions along Hwy 299? I work at the school in Shasta, and encounter two to three trucks waiting at the stop sign daily Monday through Friday in the morning hours. With increased truck traffic from the expansion, the line of trucks in the morning will surely increase. How will this be studied and mitigated so as not to negatively impact locals and school buses?
27. How will safe road routes for additional truck traffic be studied?
28. With increased truck traffic, will the roads be safe to share with bicycles? Iron Mountain Road is popular with cyclists.
29. Will increased traffic negatively impact wildlife, such as amphibians, in the area, due to noise pollution? Will the creation of a wildlife pass impact the distribution of wildlife in the area, and invite outside wildlife or push existing wildlife out of the area?
30. How will increased truck traffic, at the current speed limit, compromise the safety of the crossing at the Sacramento River Trail head at Middle Creek?
31. How will it be determined that Keswick Dam road can handle increased truck traffic? Increased truck traffic after the Carr fire, during clean up, impeded traffic. That was for an understood short period of time. How will

long term impacts of increased traffic on all routes going to and from CCA operations be studied? Mitigated?

32. I have often observed trucks with chains delivering to and from CCA. With increased truck traffic, it seems the likelihood of a fire caused by a loose chain would increase. Will there be better maintenance along the sides of the road to mitigate increased risk of sparks caused by loose chains?

33. What agency is going to conduct air quality testing before any new operation or expansion takes place, to determine current levels of pollutants and dust in the air on site and surrounding areas?

34. What agency will be providing oversight for the operations of the plant?

35. There is a concern about the 9 acres of "non jurisdictional water" claimed but not clear whether this water is non jurisdictional. Who granted this water use? Is it non jurisdictional?

FW: The wrong site for an asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 10:04 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Lang Dayton
Sent: Monday, March 22, 2021 12:42 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: The wrong site for an asphalt plant

To: Tara Patti, Associate Planner
Shasta County Dept of Resource Management
Planning Division, Suite 103

Re: Crystal Creek Aggregate [CCA] Proposal, Scoping Comments for EIR

Dear Ms. Petti,

Below are some of my concerns regarding how the proposed asphalt plant and gravel quarry expansion by Crystal Creek Aggregate [CCA] could affect our community. I believe that, if the project goes forward as planned, the environmental degradation it causes will negatively affect the region's overall economy and the mental and physical health of its neighbors. The deleterious effects of expected future light, noise, dust, and fume pollution from the proposed asphalt plant and the truck traffic, if built, on the nearby residents have been described by others and will not be repeated here.

The Shasta County Dept of Resource Management Planning Division needs to address the following questions and statements:

- The Redding area already has three asphalt plants that are capable of meeting local asphalt needs. Why do we need a fourth one?
- The proposed CCA asphalt plant will run 24 hours/day creating nocturnal noise, light, and dust from the plant, and the round-the-clock trucks that drive in, load, and drive out affecting the physical and mental health of everyone living on Iron

Mountain Road between the plant and Route 299. How can this be mitigated, if at all?

- The two asphalt plants along Clear Creek Road have been reported to the Shasta County Air Quality Management District for malodorous and irritating emissions several times. They are four times more distant from nearby homes than the proposed CCA plant. Because the intensity of light, noise, and air pollution decreases exponentially with distance, the effect of the CCA plant on the neighborhood would be expected to be 16 times worse than of the current Clear Creek plants.
- How many new jobs will the asphalt plant create and how much will it increase the net income of Shasta County's citizens?
- What will the effect of the increased air, light, dust, and noise pollution be on the local property values, tourism, and attractiveness of this community as a place to live and raise a family? How would this affect the likelihood that a state university or a high-tech, high-wage business would move to the Redding area?

Asphalt is a necessary product, but manufacturing and processing it is a dirty business that produces unhealthy and unsavory byproducts. Wherever an asphalt plant is built it needs to have state-of-the-art pollution control of fumes, dust, noise, and light installed. It has no business being near a residential or commercial area.

Lang M. Dayton, M.D., F.C.C.P.

FW: Crystal Creek Aggregate Expansion project

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 10:06 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Tom Thomas
Sent: Monday, March 22, 2021 5:53 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Aggregate Expansion project

March 21, 2021

Tara Petti
Associate Planner
Shasta County Department of Resource Management

Hello Tara,

I am writing to respectfully ask that you and your colleagues support the local community's request to reject the proposed CCA Expansion Project. I realize that, until California develops a more environmentally sound method of road construction, asphalt plants will continue to be built. However, this proposed plant is totally inappropriate for the location under consideration. Within a 2 mile radius of the proposed site are numerous private residences, including the communities of Keswick and Shasta (along with the Shasta State Historic Park), the Sacramento River, three heavily utilized multi-use trails, and Whiskeytown National Park Recreation Area. All of these would be negatively affected should a plant be permitted to be built at the proposed site. The hazardous and toxic air emissions and waste from asphalt plants are well documented, but are even more problematic in this area due to several considerations. Air pollution here will be accentuated by the frequent high pressure systems that settle over the north state and the physical barrier of the surrounding mountains. Higher than normal air pollution levels will result from both fugitive emissions and diesel truck exhaust due to the length of travel required to reach the highway system. Water/rain run-off pollution will also be especially harmful as it would impact an especially sensitive salmon and trout fishery that is important to the area economy and of religious significance to the Wintu Tribe.

On a personal level, I have worked for over 25 years as a physician tending to the health needs of Shasta County. I love the community and, being an avid outdoor person, chose to build my dream retirement home on the west side of Redding near my beloved trails. I find it ironic and distressing that the county would then consider allowing a plant to be built that would imperil my health, and devalue my property. I have asthma and should a plant be built, I would not be able to stay in this area. Unfortunately, since I will be retiring this year, this property value loss will not be recoverable.

In summary, what justification could there be to permit a plant that produces substantial amounts of air, water, noise and light pollution, that will undermine the property values in the local community, imperil the health of local citizens and local trail users, and threaten the local fishery?


Thank you for your consideration,
Thomas C Thomas, MD
15651 Rock Creek Road

FW: Crystal Creek Aggregate

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 10:11 AM

To: Bruce Grove <bgrove@shn-engr.com>

 1 attachments (90 KB)

Crystal Creek Aggregate.pdf;

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: mike anderson

Sent: Monday, March 22, 2021 8:02 AM

To: Tara Petti <tpetti@co.shasta.ca.us>; mike anderson <trk.734@gmail.com>

Subject: Crystal Creek Aggregate

Tara-

My response to the proposed expansion of Crystal Creek Aggregate is attached.

Thanks-

Mike Anderson

9944 Tilton Mine Road

Redding, CA 96001

3-22-2021

Tara,

Here are my thoughts about the proposed asphalt plant and expanded aggregate processing by Crystal Creek Aggregate at their existing location.

Background:

As a native of Redding, Ca, I grew up in South Redding in the neighborhood known as Westwood Manor. Westwood Manor was a new and expanding development with many young families buying/building homes. It was a desirable place to live as Sycamore Elementary School was right there in the development. I lived in Westwood Manor through my high school years.

As you know, Westwood Manor is located on the Hwy. 273 corridor with the railroad tracks sharing the same route of travel. There are quite a number of industrial businesses that use the railroad tracks for commerce.

While growing up, Redding Steel was in close proximity Westwood Manor and operated 24/7. I can still remember hearing the day and night operations of Redding Steel and the railroad.

A lumber mill was located up the tracks where Weaver Lumber is today. In those days there were no biomass facilities. Particle board and OSB chip sheeting was not invented yet. To dispose of waste wood from the milling process, the mill had a Tee Pee burner located near the railroad tracks. Typically, there was a smokey haze and a campfire odor in the air during this operation especially on those cold, still mornings. I love camping and it wouldn't be camping without a campfire. So, if you are standing around the camp fire and the smoke drifts into face, you move out of the way. But when the Hwy. 273 corridor and surrounding areas are smokey, you can't get away from it.

Located in Anderson, Ca, the Kimberly Clark Corporation operated a paper mill. The plant was on the North side of Cottonwood Hill at the Southern Anderson city limit. There is a biomass plant located in that spot today. As part of the paper mill process, an odor was produced that literally permeated the valley from Anderson all the way to Shasta Lake City. That was huge problem and unhealthy situation that affected thousands of people. The best analogy for this situation that I read was "If someone was generating noise that affected thousands of people, they would be told to turn it off".

That was in the 1960's and here we are in 2021 dealing with the same potential issues of noise, air, water and light pollution.

Opposition:

I do not oppose the current operations of Crystal Creek Aggregate. Crystal Creek Aggregate has a great variety aggregate and is located in a convenient location.

While there is obviously a need for paving material and additional aggregate, it's the location and close proximity to many residents of Keswick, Shasta and West and NW City of Redding that will be impacted by the previously noted forms of pollution, especially if they intend to operate 24/7 for years to come.

Due to Covid and more restrictive lockdowns elsewhere, people that enjoy outdoor recreation have flocked to Northern California to enjoy the same freedom we do. Our mountain bike and hiking trails

have been discovered and are quite busy. Quite a few of those mountain bike/hiking trails will be potentially impacted by noise, odor and particulate matter from this asphalt plant and expanded aggregate processing.

Additionally, I have lived on Tilton Mine for 20 years and it should be considered that the evening Westerly wind tends to blow fairly consistently in late Spring, Summer and early Fall when the temperatures are warmer. This will carry the spreading particulate matter and sound from this 24 hour operation. This is the same wind that drove the Carr fire into our communities as well. With that said the micro-climate within the Carr Fire scar has changed significantly. Local winds now blow through the area with increasing speeds due to the lack tree canopy to slow wind speed.

My best analogy here is looking at Hawaii Volcano's National Park. I have visited this National Park several times. When you enter the visitor's center there are various media available to help you plan your visit. One of those are TV Monitor's which show where the VOG or Volcanic Smog is affecting areas of the park. VOG is a mixture of various gas emitted during the on-going eruption process. The main gas of concern is SO₂, Sulfur Dioxide. The park has guidelines for avoiding exposure to this toxic gas. Hawaii relies on tourism for their economy to survive. The National Park chooses to give visitors the opportunity to make their own decisions and enjoy the area rather than close the park and damage the economy.

In that case, mother nature is in control of the eruption and toxic gasses. In the case of this proposed asphalt plant and expanded aggregate production, the decision to produce toxic gas and other pollution is obviously in your hands and those charged with making the final decision.

Shasta County has strict guidelines and regulations for cannabis cultivation. I suggest these same requirements be applied to the proposed asphalt plant.

Ordinance NO. SCC 2019-04:

Page 8

Paragraph 8 – "Cannabis cultivation shall not adversely affect the environment or the public health, safety, or general welfare by creating dust, glare, heat, noise, noxious gasses, odor, smoke, traffic, or vibration, by the use of storage of plant or animal poisons, or hazardous materials, processes, products or wastes, or by any other way."

The greatly increased sound, toxic fumes, odors and particulates, increased truck traffic and more light pollution contribute to my decision to oppose this plant being located on the current proposed site. Keswick, Shasta and Western City of Redding has suffered enough from the Carr fire and are still in the rebuild and healing process.

Please take the time to further study this project and ask the owners if there is modern technology to mitigate the pollution that will be generated.

Sincerely-
Mike Anderson
9944 Tilton Mine Road
Redding, CA 96001
530-515-1700

FW: Correspondence Regarding Proposed Aggregate Plant

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 10:13 AM

To: Bruce Grove <bgrove@shn-engr.com>

📎 3 attachments (142 KB)

asphalt plant; Proposed Keswick Asphalt Plant Expansion Project; Crystal Creek Aggregate Expansion Project;

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Chelsea Dwinell <cjdwinell@co.shasta.ca.us>
Sent: Monday, March 22, 2021 8:04 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Correspondence Regarding Proposed Aggregate Plant

Good Morning,

Attached is correspondence that was sent to the Board of Supervisors regarding the Proposed Crystal Creek Aggregate Plant. Have a great day!

Chelsea Dwinell, Administrative Board Clerk

SHASTA COUNTY CLERK OF THE BOARD



1450 Court Street, Suite 308B
Redding, CA 96001
Phone: (530) 225-5550
Fax: (530) 225-5189

Bruce Grove

From: Kathy Grissom
Sent: Monday, March 22, 2021 7:48 AM
To: Clerk of the Board Mailbox
Subject: asphalt plant

Follow Up Flag: Follow up
Flag Status: Flagged

This is to show my opposition to the asphalt plant in Keswick area. Absolutely ridiculous to even consider yet another assault on the people and environment of that area.
It's time for Shasta County to stop letting developers do anything they want at the expense to citizens and the earth. Not to mention the fact that we're supposed to be combating climate change.
I wonder what would happen to this plant if they were trying to put it in a "rich" neighborhood.
Kathy Grissom

Bruce Grove

From: Jeannette Logue
Sent: Sunday, March 21, 2021 7:26 PM
To: Tara Petti; Clerk of the Board Mailbox
Subject: Crystal Creek Aggregate Expansion Project

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Petti,

I am writing in strong opposition to the proposed Keswick Westside Asphalt Plant. You have received a lengthy and detailed community letter, also objecting to this plant, and I am in agreement with all points made.

It is very dispiriting to see that there are still people and businesses that have zero regard for the health of people who live and work in this region, and for the bountiful wildlife including plants that are so important to those of us who live here.

This county has a heavy economic reliance on people who come here on holiday and vacations to enjoy our much cleaner air, water, and living things. I do not think that an ecologically unsound and unhealthy asphalt plant will do anything to stimulate the growth of tourism, the interest of new business development, and future retirees who are considering a move to a lovely California county with clean air and an interest in the physical health of its residents.

You would think that even after so many decades, the elected officials in this county would remember the devastation caused by earlier irresponsible businesses in this area, including mining. There will be nothing beneficial to Shasta County arising from this plant, only to the owners of the operation, for a while. We will live with its outcomes forever.

Jeannette Logue

Bruce Grove

From:
Sent: Sunday, March 21, 2021 9:11 PM
To: Clerk of the Board Mailbox
Subject: Proposed Keswick Asphalt Plant Expansion Project

Follow Up Flag: Follow up
Flag Status: Flagged

I'll be brief, as I am sure this matter has been thoroughly researched. I wish to voice my strong opposition to the Keswick asphalt plant expansion project.

The health and environmental impact would be horrendous. Haven't the residents of the Keswick area suffered enough devastation from the Carr Fire?

Please do not allow this project to move forward.

Thank you for your time and attention to this matter.

Beverly Simone
330 Lemon Drive
Redding, CA 96003

FW: Atop the asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 10:20 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Catherine Jackson
Sent: Monday, March 22, 2021 8:05 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Atop the asphalt plant

Please do not allow an asphalt plant to come to west Redding. We need to protect our delicate environment. A healthy and clean environment is one of the reasons that we love Shasta County.

Thank you.
Catherine Jackson
96003

FW: The proposed asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 10:22 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: linda samuels
Sent: Saturday, March 20, 2021 7:06 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: The proposed asphalt plant

Please no on the asphalt plant. Consider the environmental concerns, but most importantly, consider the people who live close to the proposed plant.


Linda Samuels

FW: Crystal Creek Aggregate Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 10:24 AM

To: Bruce Grove <bgrove@shn-engr.com>

 1 attachments (27 KB)

Crystal Creek Quarry Letter.pdf;

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Joseph Rowett
Sent: Saturday, March 20, 2021 6:07 PM
To: Tara Petti <tpetti@co.shasta.ca.us>; amandarowett@gmail.com
Subject: Crystal Creek Aggregate Expansion Project

Tara Petti, Associated Planner

Please see my attached letter regarding the Crystal Creek Aggregate Expansion Project.
My wife and I are strongly against this proposal.
Thank you.

--

Joseph Rowett
Dream Design Studio

Re: Crystal Creek Aggregate Expansion Project

Tara Petti, Associate Planner

Thank you for allowing myself and other concerned citizens to have our thoughts heard on this proposed project.

My wife and I are strongly opposed to the proposed quarry expansion and inclusion of the asphalt plant. To add asphalt production to this location will drastically impact many surrounding neighborhoods. Asphalt creates a very thick smell which is carried quite readily with the wind. The location of this plant puts those caustic fumes into a direct line of the prevailing wind down the Sacramento River Valley. Our home is situated on Quartz Hill which gets a steady breeze from the West and Northwest. These fumes will funnel directly down the river and into the heart of Redding, impacting several neighborhoods along the way. The health of us and our child is of utmost importance to us, and we don't want to fear allowing our son to play outside on a windy day. Part of what brought us here from the Seattle area was the freedom of clean air.

In addition to the air quality, I am also very concerned with the proximity to the river from an infiltration standpoint. I am quite certain that a plant of this size has very strict guidelines to follow and takes safety seriously. I am also quite certain that accidents happen. I am very concerned with the enormous impact one small accident could have should harmful asphalt chemicals be released into the Sacramento River and it's vast network of tributaries downstream.

My last point is far more of a practical concern. The location of this plant offers very poor accessibility. To increase the plant to a 24 hour per day operation and the dramatic increase in trucks will be impossible without extensive upgrades. The intersection of Middle Creek Trail and Iron Mountain Road will be a very dangerous interface without proper signage, cross walk signals and lighting. This trail is very popular with bikers as well as Iron Mountain Road in general. To increase the truck and trailer traffic on this road without properly acknowledging this interaction is very short-sighted. In addition, the intersection of Iron Mountain Road and Highway 299 is currently an uncontrolled intersection with a 55-mph speed limit on the highway. Forty plus trucks per hour coming to this intersection is a fatality waiting to happen. There is no way these fully loaded trucks can safely get up to speed heading West without a dedicated entrance ramp and to expect them to cross traffic at this consistency is even more foolish. For the trucks heading East to meet up with Interstate 5, once they are able to make it across traffic, they then have to navigate the many turns through the newly updated Downtown Redding with hot asphalt fumes following close behind. The location is very poor for this type of production.

While I am not short-sighted and do acknowledge the need for asphalt as a major component of infrastructure, the location for this plant is a terrible idea.

Thank you for reading my thoughts and entering them into the public record for this project. I hope the County comes to the right decision to deny this project.

Joseph and Amanda Rowett
996 Savona Court
Redding, CA, 96003

FW: The Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 10:30 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Ellen Sugg

Sent: Saturday, March 20, 2021 3:58 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: The Asphalt Plant

Dear Ms. Petti,

I am writing to express my opposition to an asphalt plant being proposed on the site of the quarry of Crystal Creek Aggregate. I am concerned about many of the harmful effects it would generate. Those concerns include health, air quality, traffic, light, noise, water quality and disruption in residential areas. I am also concerned about the impact it would have on the wonderful trails and bikeways that attract many people to the area, These negative impacts would go way beyond just the Keswick area.

Please consider all of these impacts and do not issue a permit to this planned plant.

Sincerely,

Ellen Sugg
20388 Hudson St.
Burney, CA

FW: Crystal Creek Aggregate's proposal

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 10:46 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Virginia Phelps
Sent: Monday, March 22, 2021 9:13 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Aggregate's proposal

The Crystal Creek Aggregate's expansion proposal is an outrage.

There are other ways of creating jobs. The documentary "Bringing It Home" offers industrial hemp for jobs, fuel, food, health, housing, paper, textiles, auto parts, livestock feed.

It is available on Netflix. I also have a copy I can share.

Virginia Phelps

FW: Stop the asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 11:17 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Sandy B
Sent: Monday, March 22, 2021 9:53 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Stop the asphalt plant

Dear Tara,

I oppose the expansion of the asphalt plant 100%. There are enough cancer causing agents in our water and soil here in Redding we don't need to add more to that and the air.

Thank you for listening.

Sandy Babcock, RN, Case Manager
Redding, CA 96001

FW: Keswick Asphalt Proposal

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 11:17 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Laurie EF
Sent: Monday, March 22, 2021 9:55 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Keswick Asphalt Proposal

Please add our names to the community letter opposing the proposed Crystal Creek Aggregate Asphalt Plant expansion Project.

As 45 year residents of Redding, who came to this area for the peace, beauty and as a good place to raise our children. This is why so many people travel and move to this area: to hunt, fish, hike, camp, raise our children in a clean environment.

A strong economic driver in this county is tourism. The fires have had a big negative effect on this. Please don't add a polluting industrial plant that has been well established as a hazard to our environment and vote NO on this proposal.

Sincerely, Rex and Laurie Farley

FW: NO !!! on another toxic plant - Smell noise, land abuse, NO transparency - kept hidden/Lori

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 11:19 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Lori Bridgeford

Sent: Monday, March 22, 2021 10:33 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: NO !!! on another toxic plant - Smell noise, land abuse, NO transparency - kept hidden/Lori

Hello,

Just hearing for the first time of this proposed toxic option of west side asphalt plant proposed.

NO way can we keep adding toxic and harmful plants. This is about \$\$\$\$\$\$

Not about safety or protections. Damage done enough !!!!

Just hearing on radio KCNR , and very disturbing . Natives being trampled again

Geo engineering skies already messing up the air. Waters ruined already !

Land is jacked up. Not fair to people LIVING there, for added 24 hr NOISE ????

Prop values will sink ! NO NO NO

Who wants to live in stinkville? Covid almost decimated Rdg area . NO

Lori Bridgeford, Shasta Co

FW: proposed Crystal Creek Aggregate Inc

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 11:20 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Doug Mandel
Sent: Monday, March 22, 2021 10:34 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: proposed Crystal Creek Aggregate Inc

To:
Tara Petti,
Shasta County Department of Resource Management
Planning Division
1855 Placer St. #103
Redding, CA 96001

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics: The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation. The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night.

The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality: Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons

than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen². There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few. ¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005 ² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110 People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move. Biological Resources:

The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts to California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources. See additional biological resource concerns in the Hydrology and Water Quality section.

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Hazards and Hazardous Materials: See the Energy section for concerns about propane and petroleum storage.

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intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few un-dammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³. Land Use and Planning: While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

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The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue. Wildfire: The local community has concerns about the new asphalt plants impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories: The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes 5 Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020 4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶. In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion: The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry. The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of airborne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

An industrial plant in the middle of Redding will detract from good businesses and people relocating to Redding. This will hurt the Redding economy and our healthy way of life in the long term.

Sincerely,
Doug Mandel
Redding, CA

FW: Asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 11:44 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: ☺

Sent: Monday, March 22, 2021 10:53 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Asphalt plant

I lived near the proposed plant until after the fire and I want to adamantly protest against this! All my former neighbors have suffered enough after the Carr fire. The increased truck traffic on Iron Mountain Rd would add to the noise pollution & car damage(my windshield was broken twice by rocks kicked up by trucks). In addition, the dust and damage to the environment will cause undue damage to the people & land of this rural community!

Please do not build this asphalt plant!!

Stella Prudhomme
Walt Tausch

Sent via the Samsung Galaxy S9, an AT&T 5G Evolution capable smartphone

FW: Crystal Creek Aggregate Expansion Project Use Permit Application

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 11:46 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: MaryAnn McCrary
Sent: Monday, March 22, 2021 11:05 AM
To: Leonard Moty <lmoty@co.shasta.ca.us>
Cc: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Aggregate Expansion Project Use Permit Application

I am a 16-year homeowner in Redding who agrees with the following Community Letter. I am sending the text of the Community Letter to you in full support.

Mary Ann McCrary
Redding, CA

Community Letter:
Residents' Concerns with the Crystal Creek Aggregate Expansion Project

To:
Tara Petti,
Shasta County Department of Resource Management
Planning Division
1855 Placer St. #103
Redding, CA 96001

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics: The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation. The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night.

The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality: Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen². There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few. ¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005 ² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110 People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move. **Biological Resources:**

The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts to California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources. See additional biological resource concerns in the Hydrology and Water Quality section.

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Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter. The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property. The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

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Sincerely,

The Local Keswick Community
and

Add Your Name _____ Date _____

Your City or Community area: _____

FW: Oppose: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 2:45 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Roy Berlinghoff
Sent: Monday, March 22, 2021 12:37 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Re: Oppose: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

Hello Ms. Petti,

I had a couple of corrections that needed to be made to the letter I sent last night regarding the Crystal Creek Aggregate plan to include an Asphalt Processing Plant on Iron Mountain Rd.
Below, please find that corrected letter.

22 March, 2021

TO: Tara Petti

FROM: Roy Berlinghoff

Shasta County Dept. of Resource Mgt.

16290 Laurie Ann Lane

Planning Division

Redding, CA 96001

1855 Placer St. #103

Redding, CA 96001

RE: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001) - Revised

Ms. Petti

I write you today to express my concerns as well as to register my name amongst my many neighbors and other members of the Shasta County community who are against Shasta County's permitting the expansion of the property operated by Crystal Creek Aggregate to

include an Asphalt Processing Plant, or Asphalt Plant of any kind as per above noted Use Permit Amendment and Reclamation Plan Amendment.

My family has resided on the property due east of Crystal Creek Aggregate (hereinafter: "CCA") since 1993 and participated in recreational activities since moving into Shasta County in 1983. We have enjoyed the pristine foothills and good air quality since our first excursions into this region, from tobogganing down the hill west of our current property to bicycling and hiking the many trails nearby. We moved to Shasta County because it is a close-knit community that offers so much more than the larger cities outside of our region could ever offer.

We were aware that CCA was in operation when we moved to Keswick and while we consider the company to have been a good neighbor overall, even as we have tolerated over the years the nuisances that come with living near a quarry, from the dust, explosions from blasting, moderate truck traffic, etc. With that, it has been sad to see the foothills disappearing as time has passed by over these almost 30 years as the extreme excavation of the hillsides takes its toll.

We have now reached another threshold with the advent of CCA wishing to expand into the generation and movement of freshly processed asphalt. In my past occupation I have worked in a variety of cities far beyond Shasta County and had to work in areas that were close to asphalt plants. I can personally attest to the repugnant odors that are emitted from asphalt plants; those odors are terrible. The thought of a new asphalt plant being built in my back yard is abhorrent. A review of a significant number of documents that address asphalt generation plants, there are several elements that greatly disturb and concern me.

First is information provided by The Environmental Protection Agency (EPA), which has noted that, "Asphalt processing and asphalt roofing manufacturing facilities are major sources of hazardous air pollutants such as formaldehyde, hexane, phenol, polycyclic organic matter, and toluene. Exposure to these air toxins may cause cancer, central nervous system problems, liver damage, respiratory problems and skin irritation."

As I noted earlier, even with some issues that have been troublesome in the past, we have overall considered CCA a good neighbor. Unfortunately, as we enter this new situation, we have to all agree that when a company plans to make something right in our back yard that generates toxic fumes and substances, along with what is very likely to be noise pollution, increased vehicular (heavy truck) traffic which will often extend into all hours of day and night, that is going too far. I was recently diagnosed with cancer, and one of our close neighbors is currently undergoing cancer treatment. I cannot imagine that allowing an asphalt plant that will lift cancer-causing elements into the air we breathe and into streams of the water we drink and fish in to be a good thing. Add to these facts that an asphalt plant will absolutely cause my property values and those of others in this area to be greatly reduced and you must see why we believe it is time to take a stand against such a development. CCA's proposal has crossed a line that, should an asphalt plant be approved, will absolutely compromise the quality of my life, my family's lives and the lives of all my neighbors.

Myself, my wife, our friends and family, along with all of my neighbors and our local community are all strongly against the proposed addition of a new asphalt plant within the existing quarry. We are concerned that the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people have sought out to come and enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects.

The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bicyclist conflicts to increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. We are living proof of the tragic events of the Carr Fire as we lost our home and over 40 years of heirlooms from our immediate family and 100+ year old heirlooms that came to America with members of our ancestors and were handed down to my family. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

In closing, below is a master list of concerns that must be addressed:

- Air pollution from asphalt plant operations
- Water pollution from asphalt plant operations
- Air pollution from loading and transport of asphalt (“fugitive emissions”)
- Air pollution from storage of asphalt and any other toxic materials (also “fugitive emissions”)
- Air pollution from number of diesel trucks coming, going, idling
- Air and water pollution from quarry activities, crushing concrete
- Sediment issues in drainages, creeks, streams, river
- Water pollution that derives from the loading and transport, storage of materials, and truck traffic
- Light pollution from night operation
- Noise pollution from running of asphalt plant, blasting, and truck traffic
- Noise pollution particularly at night
- Noise pollution from blasting
- Health concerns from asphalt plant and quarry activities
- Truck traffic congestion for residents and recreators
- Safety concerns from truck traffic
- School bus
- Property values
- Impact on bicyclists, motorcyclists, vintage car enthusiasts
- Salmon fishing rights for Wintu tribe
- Salmon and steelhead spawning grounds
- Quality of life
- Wind carrying fumes – how far?

- Fire safety – asphalt and the materials used to make it very flammable
- 9 acres of “non-jurisdictional water” claimed but not clear whether this water is non-jurisdictional
- Aesthetics of area
- Ability of county to attract clean industry and tourism
- Oversight
- Prior history of violations

Should you have any questions or require any follow up, please contact me by cellular phone at (323) 719-5423.

Sincerely,

Roy Berlinghoff

On Monday, March 22, 2021, 09:52:05 AM PDT, Tara Petti <tpetti@co.shasta.ca.us> wrote:

Thank you for your comments, they have been added to the administrative record. I have added your contact information (email) to the contact distribution list so you will be notified directly of all opportunities for public input/participation in the process. Currently the County is in the early phases of the environmental review process for the project. Your comments help identify potential impacts to the physical environment that should be studied/analyzed in the Draft Environmental Impact Report (EIR), and I thank you for your participation. Once the Draft EIR is complete, it will be circulated and the public and agencies will have an opportunity to comment on the adequacy of analysis in the EIR. Subsequently, a Final EIR will be completed including responses to all pertinent comments, and a Planning Commission hearing will be scheduled. Members of the public may attend the hearing and express all types of concerns regarding the merits of the project. The Planning Commission is the governing body that will approve or deny the project.

I hope this information is helpful. Please feel free to contact me with questions.

Best Regards,

Tara Petti

Associate Planner

Shasta County Department of Resource Management

Planning Division

1855 Placer Street Suite 103

Redding, CA. 96001

Department Main Line (530)225-5532

From: Roy Berlinghoff
Sent: Sunday, March 21, 2021 11:41 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Oppose: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

21

March, 2021

TO: Tara Petti
Berlinghoff

FROM: Roy

Shasta County Dept. of Resource Mgt.
Ann Lane

16290 Laurie

Planning Division
96001

Redding, CA

1855 Placer St. #103

Redding, CA 96001

RE: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

Ms. Petti

I write you today to express my concerns as well as to register my name amongst my many neighbors and other members of the Shasta County community who are against Shasta County's permitting the expansion of the property operated by Crystal Creek Aggregate to include an Asphalt Processing Plant, or Asphalt Plant of any kind as per above noted Use Permit Amendment and Reclamation Plan Amendment.

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tolerated over the years the nuisances that come with living near a quarry, from the dust, explosions from blasting, moderate truck traffic, etc. With that, it has been sad to see the foothills disappearing as time has passed by over these almost 30 years as the extreme excavation of the hillsides takes its toll.

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- 9 acres of “non-jurisdictional water” claimed but not clear whether this water is non-jurisdictional
- Aesthetics of area
- Ability of county to attract clean industry and tourism
- Oversight
- Prior history of violations

Should you have any questions or require any follow up, please contact me by cellular phone at

Sincerely,

Roy Berlinghoff

FW: Stop Keswick Asphalt Project

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 2:48 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Kathryn Henderson
Sent: Monday, March 22, 2021 12:48 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Stop Keswick Asphalt Project


PLEASE stop the horrific Keswick Asphalt Project. It's health & environmental impacts are horrendous. Sincerely, Mary
Kathryn Henderson, 2221 Deerfield Ave. Redding, CA

FW: Comments RE: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 2:51 PM

To: Bruce Grove <bgrove@shn-engr.com>

 1 attachments (595 KB)

CCA Scoping Comments Submission.pdf;

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Ayla Tucker

Sent: Monday, March 22, 2021 1:05 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Comments RE: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

Good Afternoon,

Attached please find submission of written scoping comments regarding the Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001).

Thank you,

Ayla Tucker
P.O. Box 9
Shasta, CA 96087

To: Tara Petti, Associate Planner
1855 Placer Street, Suite 103
Redding, CA 96001
tpetti@co.shasta.ca.us

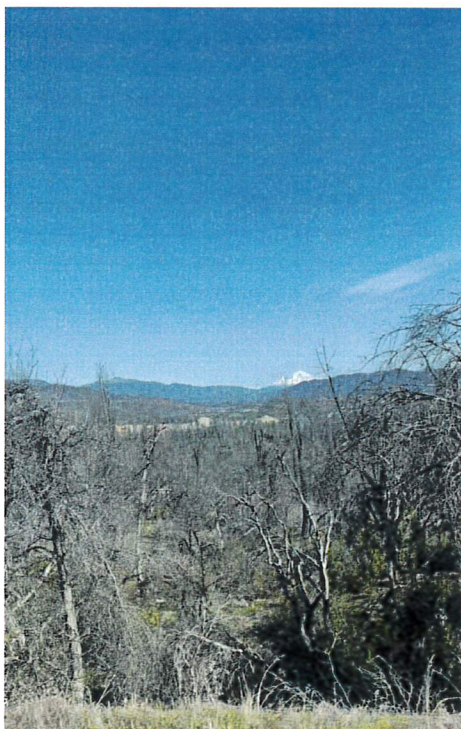
From: Ayla Tucker
P.O. Box 9
Shasta, CA 96087

RE: Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001) - Written Scoping Comments

Please find below comments related to the Crystal Creek Aggregate Expansion Project for consideration in the preparation of the EIR. The comments provided below are arranged in no specific order.

AESTHETICS:

The Initial Study developed by the County of Shasta indicates “there are no designated State or federal scenic highways or scenic highway corridors in the vicinity of the proposed project. However, it is relevant to note that Highway 299w was designated the “Trinity Scenic Byway” in October 1991 by the United States Forest Service. Currently, Crystal Creek Aggregate is visible on this highway. The image provided below is taken directly from the roadway on Highway 299W. For reference, the closest address is 16064 Homestake Rd, Redding CA 96001 (Cal Fire Shasta Trinity Unit - Station 58). Development of the proposed asphalt plant will negatively impact the aesthetics of the above mention scenic byway. Therefore, it is requested the EIR evaluate aesthetics impacts to include the evaluation of impacts to the Trinity Scenic Byway.



NOISE:

The Initial Study determined findings of Potential Significant Impacts related to noise. It is requested that while the EIR evaluate noise impacts, specific consideration is made for the post-Carr Fire environment. It is request that any studies and/or evaluations be made without the consideration of the surrounding environment prior to the Carr Fire. Due to the loss of trees, brush, and other foliage, the surrounding terrain has increased susceptibility to the generation and carrying of noise. While only being able to provide anecdotal evidence, property owners can attest to the increase in noise levels due to the loss of foliage/trees (as a noise barrier) as a result of the Carr Fire. Increased noise post-Carr Fire is attributed to traffic, drilling, blasting, and use of heavy equipment. Therefore, any noise studies should be based upon current terrain (post-Carr Fire) versus prior (pre-Carr Fire) noise studies (if applicable).

OTHER COMMENTS:

While generally captured in the Initial Study, the following comments are being presented in this format for record, to demonstrate support for the widespread community concerns related to the proposed project.

Safety/Traffic Concerns: There is no exit from the plant that does not send the trucks through residential neighborhoods. With the proposed increase in traffic generated by the asphalt plant, the existing affected roadways (primarily Iron Mountain Road) which were not designed nor built to handle the increased Traffic Index (TI) will be degraded. The intersection of Iron Mountain Road and Highway 299 would be negatively impacted by the proposed increase in traffic. Not only does this affect members of the Keswick and Old Shasta communities, this affects the numerous residents and visitors who recreate, travel, and access the surrounding cultural and recreational sites.

A threat to bicyclists and pedestrians : Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and the increased truck traffic will pose a significant danger to bicyclists and pedestrians.

Water/Sacramento River Watershed Concerns: Two ecologically valuable streams that drain into the Sacramento River (Rock Creek and Middle Creek) surround the proposed location of the asphalt plant and cement crushing facility. There are significant concerns regarding the turbidity of water run off. Any current or potential runoff may drain into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few undammed tributaries to the Sacramento River in the Redding area. Any sediment from existing operation and operations proposed in the application that is not captured by the settling ponds has a significant potential to flow into Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon.

Air Quality Concerns: There are concerns that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant.

There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main “smell” component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry’s location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few.

Wildfire Concerns: The local community has concerns about how the proposed asphalt plant may impact on wildfires. The community is worried that the plant itself might be the cause of a wildfire. In 2018, a Northstate asphalt plant caught fire and severely damaged the plant. The proposed asphalt plant could increase the threat of wildfire in an existing High Fire Threat District.

Recreational Concerns : Adjacent to the property is land owned by the Bureau of Reclamation which is used for recreation. While many trails (named and unnamed) surround the project site, one trail in particular, called French Fry, circles the existing property and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by potentially introducing very strong odors into an area people seek to come too, primarily to enjoy the natural environment and enjoy the fresh air.

(Additional) Noise Concerns: The proposed asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. The proposed asphalt plant

would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest. With the proposed asphalt plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources.

FW:

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 3:12 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Diane Bell-Gardinier
Sent: Monday, March 22, 2021 12:21 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject:

Keswick Resident's Concerns with the Crystal Creek Aggregate Expansion Project

To Whom It May Concern:

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics:

The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation.

The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night. The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality:

Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen².

There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few.

¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005 ² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110

People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move.

Biological Resources:

The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts to California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources. See additional biological resource concerns in the Hydrology and Water Quality section.

Energy:

Local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like manzanita and oak, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire.

Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials:

See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality:

The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter.

The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property.

The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few un-dammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³.

Land Use and Planning:

While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant

in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise:

Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest.

With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill.

While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt

plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation:

The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this

³226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021

⁴Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020

part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come too, primarily to get into the woods and enjoy the fresh air.

Transportation:

The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow

existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry.

The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue.

Wildfire:

The local community has concerns about the new asphalt plans impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories:

The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes

⁵ Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020

4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶.

In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion:

The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry.

The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,

The Local Keswick Community

Name Diane Bell-Gardinier

Signed Diane Bell-Gardinier

Date 3/22/21

⁶ Per conversations with Northstate and J.F. Shay asphalt plant operators, February 26th 2021

FW: objection to proposed asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 3:13 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Jennifer Phelps
Sent: Monday, March 22, 2021 12:35 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: objection to proposed asphalt plant

March 22, 2021

Dear Ms. Petti:

I am writing to express my concerns about a proposed asphalt plant located on Iron Mountain Road. As a homeowner and resident of west Redding, a county employee, a social worker, and an involved community member, I feel it is my responsibility to lend my voice to the mounting opposition to this plant.

Increased traffic, 24-hour noise, light, and sound pollution, and environmental impacts are among the reasons why this project should not be given the green light to go forward. Shasta County's own environmental study cites "potentially significant impact" in the areas of aesthetics, biological resources, hydrology and water quality, noise, utilities and service systems, cultural resources, greenhouse gas emissions, transportation, wildfire, air quality, energy, "hazard and hazardous," and mandatory findings of significance. These gravely concerning factors impact an area that has already suffered social, economic, and environmental wounds from the Carr Fire.

The proposed area is a watershed to the Sacramento River and impacts several species of fish. Odor and air pollution are real and concerning issues. Increased traffic will impact noise in many residential areas, including two in which I own homes in west Redding; specific impact is estimated to be felt at night, which is an unacceptable blow to quality of life in this area, where residents value peace and undisturbed tranquility and have chosen to live here based on these preferences and the buffer zone this area has always offered.

Additionally, this rural community is not designed to absorb the increased traffic, noise, and pollution impact that would result from the proposed plant. The flammable nature of the proposed plant poses an unacceptable fire risk in an area

which is already at high severity risk of wildfire. As our Redding economy struggles to recover from the impacts of the Carr Fire and the subsequent COVID-19 pandemic, a blemish on our lakes, streams, and trails is the last thing this community needs.

Thank you for considering these valid concerns. My hope is that you and the other concerned parties can understand and appreciate that the delicate economy, quality of life, and ecological balance in west Redding cannot withstand the blow that this proposed plant would deliver. As a community, we need to unite to protect our assets, which include our investors, our homeowners who have chosen to live in this area, our tourism and recreation industries, and our precious natural resources.

Sincerely,

Jennifer Phelps

Jennifer Phelps

Note: This email and any files transmitted with it may contain confidential and/or privileged material and is intended only for the person or entity to which it is addressed. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you have received this email in error, please notify the sender immediately and delete this material from all known records.

RECEIVED
SHASTA COUNTY

MAR 22 2021

DEPT OF RESOURCE MGMT
BUILDING DIVISION

3-17-21

Please, Please, Please

Δ Change location and verify
necessity of Crystal Creek Aggregate
Expansion Project. Current plans are
way way way too gross to be so
near vulnerable, traumatized
residents.

Still H₂O B₂ PK and
the east side is better able
to handle such.

Joy Newcom Wade
(R.N. F.N.P. - P.A.)

P.O. Box 720327

96001

RECEIVED
SHASTA COUNTY

MAR 22 2021

DEPT OF RESOURCE MGMT
BUILDING DIVISION

3-17-21

Please consider
more overpasses
for railroad tracks
south of Cypress Ave —
South Bonnyview especially
to improve commutes
for large numbers of residents.

Jim Newcom - Wade
(R.N.C. F.N.P. - P.A.)
P.O. Box 720327
96001

RECEIVED
SHASTA COUNTY

MAR 22 2021

DEPT OF RESOURCE MGMT
BUILDING DIVISION

In planning projects,

please move Benton Airpark's

old, noisy, questionable

planes to east side airport.

There's been too many crashes

and noise and deaths, already.

Gay Newcom-Wake

(R.N., F.N.P. - P.A.)

P.O. Box 720327

96001

March 18, 2021

Ms. Tara Petti
Shasta County Department of Resources Management
Planning Division
1855 Placer Street #103
Redding, CA 96001

Dear Ms. Petti:

I live in West Redding in River Ridge neighborhood and am very familiar with Crystal Creek Quarry. I am very concerned about the proposed Asphalt Plant and the quarries proposed expansion. First, the traffic increases of truck traffic would be a real negative impact to the local road system traffic. Second, the down canyon winds carrying asphalt odor would directly impact the neighborhoods of Stanford Hills, Land Mark and River Ridge subdivisions. Having grown up in the Bay Area where oil refineries spewed pollutants daily, one of the critical qualities of Shasta County is the high air quality.

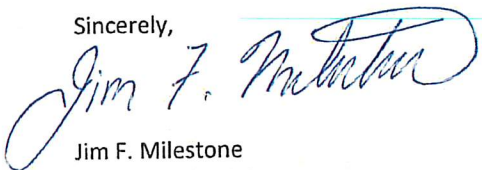
One of the things I appreciate about Shasta County is very little development is west of Redding. Over 100 miles of forest exist between the coast and Redding. The prevailing winds cross over a natural landscaper free of any pollution with the exception of automobile exhaust from 299 Highway corridor. Establishing an asphalt plant between Whiskeytown and Redding would be an extremely bad decision and would have an adverse impact on the quality of life for residents of Old Shasta, Keswick and west Redding. I exercise by running along the Sacramento River Trail several times a week from Keswick Dam area. I really appreciate the clean air, the natural beauty of the area and the quiet ambience.

The proposal also does not adequately address water quality aspects of protecting Rock Creek and Salt Creek from contamination from the proposed asphalt plant which drain into the salmon bearing Sacramento River.

Finally, I believe the proposed quarry site expansion would be an industrial blight on the scenic beauty of the Iron Mountain Road corridor. Currently, one can easily see the quarry operation from Iron Mountain Road, but beyond that it is difficult to see the quarry. The quarry operator recently expanded a dozer line up the hill which outlines a small portion of the proposed expansion to the west of the existing borrow pits. If this expansion goes forward, a large visual scar will be visible from not only Iron Mountain Road, but also from the hills of west Redding, especially in the neighborhoods east of Buenaventura Boulevard.

I am adamantly against the County issuing a permit for establishing an Asphalt Plant and expanding the existing quarry further into the hills to the west of the present barrow pits. There comes a time, when the quarry needs to stop excavating, and allowing expansion now, would be detrimental to the people living in and around the existing quarry and to those that utilize the wonderful recreational resources on the neighboring BLM and NPS I(Whiskeytown NRA) lands of west Redding. Expanding the mining operation of the quarry would just continue over a century and a half of environmental degradation of west Redding that has left a legacy of pollution and contamination that ranks in the top ten polluted sites in America (Iron Mountain Mine).

Sincerely,



Jim F. Milestone
3411 Showboat Ct.
Redding, CA. 96003

Keswick Resident's Concerns with the Crystal Creek Aggregate Expansion Project

To Whom It May Concern:

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics:

The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation.

The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night. The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality:

Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen².

There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few.

¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005

² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110

Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³.

Land Use and Planning:

While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise:

Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest.

With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill.

While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation:

The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this

³ 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021

⁴ Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020

4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶.

In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion:

The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry.

The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,
The Local Keswick Community

Name Bob Madison

Signed Bob Madison

Date 03/18/2021

⁶ Per conversations with Northstate and J.F. Shay asphalt plant operators, February 26th 2021

MAR 29 2021

DEPT OF RESOURCE MGMT
PLANNING DIVISION

Tara Petti, Associate Planner
Shasta County Department of Resource Management,
Planning Division

Dear Tara Petti,

Below are my comments regarding the Revised Notice of Preparation of an Environmental Impact Report regarding the Crystal Creek Aggregate Expansion Project.

First, I invite Ms. Petti and the Planning Department to drive out to Laurie Ann Lane and look at the Crystal Creek Aggregate and not from the street level only. Drive up Laurie Ann Lane to the top of the hill, there is an empty lot there. If the view of the quarry doesn't stun and sadden you think of this doubling in size with a huge hole and then add an asphalt plant. Unthinkable and unimaginable, there is such a scar already that it is hard to envision it being worse than it is. Now follow Laurie Ann down the hill. Six new homes, five already occupied by survivors of the Carr Fire. The sixth property was purchased by a young couple with the hopes of having a family someday. They are building a home with a pool and are in the process of clearing the dead trees (as we all are doing) and planting new growth. How do you think they felt when they found out, from me, as they did not receive a notice, that there could be an asphalt plant in their backyard? How did any of us feel? We would not have rebuilt if we thought this could happen--would you?

In the Fall of 2019 our neighbor told us about Crystal Creek Aggregate applying for a proposed asphalt plant. We never received any notification about this proposal and by the time we found out about it the scoping/comment period was over. We were half way done with our rebuild but never heard another word about the notice or proposal. This time the notices were mailed out on February 19, 2021. I have neighbors on Laurie Ann Lane that never received a notice. We are right across the street from CCA, why didn't everyone on Laurie Ann Lane receive a notice?

I found out in December 2020 that I have breast cancer. I had a lumpectomy in February, 2021 and will be having further cancer treatment in the near future. How will the expansion of the quarry and the addition of an asphalt plant affect my cancer? This is very worrisome to me.

I would like to know if part of the Environmental Impact Report will address the effects of pre-existing conditions, e.g. asthma, COPD, cancer and other respiratory conditions as pertaining to living in close proximity to an asphalt plant and large quarry?

We are survivors of a natural disaster. We choose to rebuild our home on our burned out lot thinking doing so would help us heal. We wanted to show our three grandsons that you can rebuild your life after extreme hardship and loss. We had hoped that by rebuilding we would help our neighborhood recover and put the past grief behind us.

If the project that CCA is requesting is approved we will be faced with a man-made disaster. We live at ground zero. Our grandsons will probably not be coming over to swim and hang outside

at Nanny and Grandpa's. Our daughter and son-in-law are both in the medical field, one is a nurse, the other a paramedic. They are very aware of the toxic nature of the expansion and asphalt plant.

I know you are receiving comments and questions regarding the science and hard facts relating to the proposed expansion and asphalt plant at CCA. Everyone that has an interest in this proposed project will be waiting for the scientific and unbiased forthcoming EIR.

But how will you measure the damage done to our hearts? I am heartbroken (again) that this proposal is even being considered. I am having trouble sleeping and the happiness and joy I was just letting myself feel again is gone for now. I am unsettled and worried about what we will do if this project is approved. Because of my health issues, I will not feel safe living with an enlarged quarry and asphalt plant in my backyard. This is my reality.

I haven't yet touched on the value of our property and how much that will fall. Most of us that rebuilt on our burned out lots used the money from our insurance companies. What you are given is enough to rebuild a house and a little for your yard, maybe, period. Any extras, clearing dead trees, landscaping, personal touches comes out of your own pocket. Most of our properties are better, we are improving our neighborhoods. CCA's expansion and asphalt plant could lower our property values 50%. Like I said we live at ground zero, across the street.

I know that at this stage in the governmental process HSN will be going forward and preparing the Environmental Impact Report and looking into all the environmental issues associated with CCA's request for approval of expansion and building an asphalt plant. Please don't discount the issues I have requested to be included in your report. We are part of this environment too and as such have just as much to lose.

Kathryn A Williams
10921 Stacie Way
Redding, CA 96001



MAR 22 2021

Keswick Resident's Concerns with the Crystal Creek Aggregate Expansion Project

DEPT OF RESOURCE MGMT
PLANNING DIVISION

To Whom It May Concern:

The local community has concerns about the proposed Crystal Creek Aggregate Inc expansion project. This letter will address the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics:

The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation.

The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night. The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality:

Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen².

There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects.

Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few.

¹ Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005

² Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110

People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move.

Biological Resources:

The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts to California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources.

See additional biological resource concerns in the Hydrology and Water Quality section.

Energy:

Local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like manzanita and oak, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire.

Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials:

See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality:

The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter.

The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property.

The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few un-dammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the

Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³.

Land Use and Planning:

While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise:

Allowing Crystal Creek to build an asphalt plant would have a massive impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest.

With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines produce working hard to pull the heavily loaded trucks up the hill.

While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation:

The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this

³ 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021

⁴ Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020

part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come too, primarily to get into the woods and enjoy the fresh air.

Transportation:

The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry.

The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue.

Wildfire:

The local community has concerns about the new asphalt plans impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories:

The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes

⁵ Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020

4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶.

In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion:

The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry.

The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,

The Local Keswick Community

Name

Kathryn A Williams & Stephen E Williams

Signed

Kathryn A Williams Stephen E Williams

Date

3/22/2021

⁶ Per conversations with Northstate and J.F. Shay asphalt plant operators, February 26th 2021

RECEIVED
SHASTA COUNTY

MAR 29 2021

Dear Tara Petti and Paul Hellman,

DEPT OF RESOURCE MGMT
PLANNING DIVISION

I would like to add my voice to the group of concerned citizens protesting the proposed Crystal Creek Aggregate quarry expansion and asphalt batch plant. I'm sure you are aware of our neighborhood's concerns regarding the degradation of the environment, loss of property values, threat to health, and negative impact on our quality of life in general. Those issues will be addressed as part of the permit process.

My fear is, the proposal will be approved with the assumption that various mitigation measures will alleviate any potential negative aspects. My research on the subject has confirmed that a "green" asphalt plant doesn't exist. People don't erect an asphalt plant with the idea of improving the quality of the surrounding environment. There is no such thing as a zero emission plant, or the accompanying storage, transport, and distribution systems needed to move the product. A plant that meets all federal and state requirements regarding emissions, noise, and light thresholds, will still negatively affect the surrounding area.

The quarry does not have a very good track record of compliance regarding dust control. Something that seems relatively simple to control, yet hard for them to mitigate, does not bode well for the proposed installation of a petroleum based adjunct to their business. How responsive and diligent will the agency responsible for enforcement of violations be? And who would that be? Shasta County, the State? Oversight of the facility and it's "acceptable levels" of toxic byproducts, is very concerning.

My wife and I moved to Redding in 2017 to be closer to our grandchildren. Unfortunately, we were misled by the previous owners of our property about the impact of the nearby quarry (noise, dust), but loved the area and our little piece of it. Eleven months later, the Carr fire happened. We and most of our neighbors lost everything. Two years later, the community is coming back. There are three houses being built on our street right now. We've rebuilt, and just had our first anniversary in our new home. Had we known this project was going to happen, we would never have considered staying here.

Keswick is not a wasteland, but if the CCA proposal is approved, that will change. Approval of this project will have an extremely negative affect on the environment, the lives of those of us who live here, and the many visitors that enjoy the area

Sincerely,



Stephen E. Williams
10921 Stacie Way
Redding CA 96001

FW: Asphalt plant concerns

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 3:28 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Beth

Sent: Monday, March 22, 2021 3:14 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Asphalt plant concerns

Hello Ms. Petti,

I ran into a friend today who told me about the proposed asphalt plant. As a cyclist, I use Iron Mt. Road quite often as it connects some excellent, quiet roads and trails in the area. I love the serenity of cycling in that area and watching it recover from the devastating fires. It would be really unfortunate for those who live in the area to have to put up with the noise and pollution from such a plant. I would certainly be saddened to have to share the road with numerous trucks and breathe foul air when I am trying to enjoy nature and exercise.

Please reconsider approving a plant that will have such a detrimental impact on our area. Say no to this proposal.

Elizabeth Jorde
Shasta County

Sent from my iPhone

FW: Shasta County Supervisors Meeting 3/23/21

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 3:31 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Alan Phillips

Sent: Monday, March 22, 2021 1:49 PM

To: lmoty@co.ca.us

Cc: Clerk of the Board Mailbox <ClerkoftheBoard@co.shasta.ca.us>; Tara Petti <tpetti@co.shasta.ca.us>; Cheryl McKinley <mckinley.c@gmail.com>

Subject: RE: Shasta County Supervisors Meeting 3/23/21

Importance: High

Dear Supervisor Moty, et al,

Issue 1:

Nearly 70 homes around my residence were completely destroyed by the Carr Fire in 2018 – only ½ mile from Keswick Dam - my home suffered over \$100,000 in damages including part of my roof being destroyed by the EF-3 Firenado that wiped out most of my neighbors. We only had seconds to escape before potentially being killed. Every puff of smoke, uptick in traffic, unusual sounds or strange odor that blows by still causes us a Post Traumatic Stress that makes us drop everything we're doing... to investigate, or to evacuate.

Born and raised around Redding, it wasn't that long ago when after MANY years of public complaints that a Federal Superfund Site was established to quietly attempt an unremovable clean-up of the Iron Mountain Mine efflux into our once ecologically stable and beautiful Sacramento River. In the interest of progress, an alternate location well removed from our growing residential and small business communities as well as ecologically sensitive areas would be a better fit and perhaps more sustainable.

Please do not approve a permit to build the proposed Crystal Creek Asphalt Plant near Rock Creek, Middle Creek, Sacramento River and Keswick Dam.

Issue 2:

Inasmuch as Supervisor Baugh is attempting to undermine our County Health Department's stable and well-

memorialized efficacy in relationship with our State oversight and assets, **I strongly urge that Mr. Baugh's motion to separate our health needs from the State be rendered as impotent as his recent and most irregular politics.**

Issue 3:

Please vote No on Mr. Jones' so-called, "Second Amendment" proposal! As a CCW holder and pro Second Amendment, I respectfully request that Supervisor Jones' motion be heaped upon those of Mr. Baugh's - into the round file of politicized chicanery and misdeeds under the color of an otherwise once functional Supervisorial Board. As a Governor Appointee Board Member myself, we are sworn to uphold our oath and avoid **ANY PERCEPTION** of a conflict of interest. Mr. Jones appears to not be held to that same standard in this matter: *Why is that?*

Respectfully Submitted,

Alan Ernesto Phillips
11342 Puffin Way
Redding CA 96003

1855 PLACER #103

TARA PETI ASSOCIATE PLANNER
SHASTA DEPT OF RESOURCE PLANNING
1855 PLACER SUITE 103
REDDING

RE CRYSTAL CREEK AGGREGATE EXPANSION

1) THE PLANT WILL NOXIOUS + TOXIC
FUMES - WHICH CREATE RESPIRATORY
+ HEALTH PROBLEM FOR NEIGHBORS
AND CHILDREN

2) ^A THOUSANDS TRUCKS GOING DOWN
IRON MOUNTAIN ROAD AND HIGH
WAY WILL ^{CAUSE} TREMENDOUS TRAFFIC
CONGESTION THERE IS NOT THE
ROAD INFRASTRUCTURE AND AIR
POLLUTION

IT IS THE IMPROPER LOCATION :
BECAUSE AIR POLLUTION AND
TREMENDOUS TRAFFIC CONGESTION

Russ Wade
1991 Heller
Redding CA 96001

RECEIVED

MAR 22 2021

COUNTY OF SHASTA
PERMIT COUNTER

FW: Asphalt Plant Construction - No Thank you

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 4:45 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Patricia Davis

Sent: Monday, March 22, 2021 4:28 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: Asphalt Plant Construction - No Thank you

Tara Petti,

I would like to express my opinion. Expanding Crystal Creek Aggregate to include an Asphalt Plant is dangerous to the health and safety of Shasta County residents.

SAFETY CONCERNS:

1. Iron Mountain Road is narrow and is a common bike route.
2. If the plant increases heavy truck traffic, the road should be widened to include a wide bike lane on both sides of Iron Mountain Road.
3. There is a common group of mountain biking and running trails that traverse iron Mountain Road and increased truck traffic will be dangerous.
4. Dust, dirty effluent water and noise will detract from the trail system used by health-minded residents.
5. Light pollution and noise from the plant during nighttime operations is disruptive to nearby residents.
6. Dust, greenhouse gases and chemical/fuel residues will impact the watershed.
7. Vibrations and noise throughout the day and night are detrimental to wildlife and people.

OTHER CONCERNS:

8. Highway 299 produces heavy noise and an increase in traffic into and out of this plant will increase noise pollution.
9. The enormous scar from current mining will only become more unsightly. Will there be a replanting effort to decrease the unsightly result of the mining?
10. People live here for the quiet, privacy and darkness at night.

I live less than 4 miles from the proposed construction and I am deeply troubled by the estimated

increase in traffic. I cycle the area frequently and the roads as they are require immense caution. I fear for my safety if this project is considered as having No Impact because it most certainly will to me.

Shasta County may garner some income, CCA will turn a profit, but the cost of upkeeping our roads, safety and quality of life will be paid by me and my fellow residents. The cost to us is too great from my perspective.

Patricia Davis
3533 Stone Ridge Place

FW: NOP : Crystal Creek Aggregate Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 5:00 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Steph Velasquez
Sent: Monday, March 22, 2021 4:51 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: NOP : Crystal Creek Aggregate Expansion Project

Ms. Petti,

I would like to take this opportunity to submit my comments on the proposed expansion of the Crystal Creek Aggregate plant in Redding.

My principal concern is the addition of the asphalt plant. The proposed 24 hour a day, 6 day a week operation substantially differs from the current operation, and I am concerned about the necessity of a 24 hour a day operation in this setting. The introduction of night time noise and light pollution will have a significant impact on the quality of life for the local residents who have chosen a dark, quiet space rather than living within the more urbanized parts of Redding. Further, the potential adverse effects to air quality, which in Redding is already subject to nearly year round smoke and particulates, also concerns me.

Finally, I am concerned the increase in operations will introduce more traffic on a route many people use for cycling. I also believe running a 24 hour operation will introduce traffic, noise and light into hours which are typically associated with more calm.

I appreciate your consideration of these comments when the analysis is prepared.

Thank you for your time,
Steph Velasquez

FW: Asphalt proposal

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 5:02 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Vivi-Anne Thompson
Sent: Monday, March 22, 2021 4:57 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Asphalt proposal

Please add our names to the community letter opposing the proposed Crystal Creek Aggregate Asphalt Plant expansion Project.

As 47 year residents of Redding, we came and stayed in this area for the beauty and as a good place to raise our children. This is why so many people travel and move to this area: to hunt, fish, hike, camp, raise our children in a clean environment.

A strong economic driver in this county is tourism. The fires have had a big negative effect on this. Please don't add a polluting industrial plant that has been well established as a hazard to our environment and vote NO on this proposal.

Thank you for your consideration,

Vivi-Anne and Tim Thompson

Sent from my iPhone

FW: Crystal Creek Asphalt Plant

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 5:04 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: immsue7@gmail.com
Sent: Monday, March 22, 2021 4:39 PM
To: Tara Petti <tpetti@co.shasta.ca.us>; Sue Taylor <immsue@msn.com>
Subject: Crystal Creek Asphalt Plant

Tara Petti, Associate Planner
Shasta County Dept. of Resource Planning
1855 Placer St. Ste 103
Redding, CA 96001

I am writing in response to the proposed Asphalt Quarry with Crystal Creek Aggregate. This proposed Quarry will have a very negative, destructive and damaging impact; not only with the Air and Water Quality, the increased noise levels and 24 hour operation, the doubling of truck traffic, the potential impact on the area Trails and Recreation system, but also, the devastating impact of the spawning beds in Middle Creek.

Middle Creek borders our property on two sides; we have witness numerous days of CCA washing into the Creek. We have seen the discoloration, the degrading of the water quality, and the damage done to the creek and the Spawning Beds there. For a number of years the fish ceased to spawn there, for at least as long as CCA was self-monitoring. Having this monitoring done by an outside agency could provide a more capable, honest, and accurate monitoring system. I don't believe the spawning beds have ever fully recovered.

This proposed Quarry has a potential negative and a most harmful impact not only on the environment and the Sacramento Watershed, but to the health, safety and welfare of our communities as well.

Sue Taylor
PO Box 71
Shasta, CA 96087

Sent from Mail for Windows 10

FW: Regarding the Crystal Creek aggregate expansion project

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 5:05 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Cheri Watt
Sent: Monday, March 22, 2021 5:02 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Regarding the Crystal Creek aggregate expansion project

This letter is in regards to the expansion of CCA and the addition of an asphalt plant on their property. My biggest concerns are the degradation of spawning habitat on Middle Creek, the additional air, noise and light pollution that running the asphalt plant 24 hours a day will will cause. This asphalt plant, along with expanding the mining operations at CCA, would result in increased runoff and sedimentation to Middle Creek. In other , that Prepared for this project it states that his sediment ponds are permitted to run into the tributary that plays in the middle creek. It states that this has "rarely" happened. I own the property at Iron Mountain Road and Middle Creek bridge, at the mouth of this tributary. I have documented numerous times and there have been complaints to water quality made during times that this tributary runs muddy while Middle Creek is clear.

The Western Shasta Resource Conservation District has been working with landowners and stakeholders to identify problems, develop solutions implement actions to address small- scale restoration of Middle Creek. Middle Creek supports spawning runs of rainbow trout, steelhead and salmon. A reconnaissance survey conducted by the USDA Soil Conservation Service (now NRCS) in November, 1990, estimated over 2,000 cubic yards of sediment present in the north fork, south fork, and main stem of Middle Creek. At that time the sediment was largely confined to the upper watershed, but without mitigation, the sediment was expected to move downstream during high rainfall events into principal spawning habitat. The survey showed two major sources of erosion: 1) soil erosion from unsurfaced roads, cut and fill (side-cast) banks, and 2) erosion from housepads at various stages of completion. Poorly compacted side-cast material showed the most severe erosion with high densities of rills and some gullies present. Most of the development occurred, and continues to occur, on steep terrain and on highly erosive decomposed granitic soils. Federal, state, and local agencies initiated emergency actions to capture and remove sediment from the creek.

I know that CCA's emptying of their sediment ponds has led to further degradation of the watershed.

The truck traffic was already significant, due to the aggregate company. It was allowed to increase significantly after the Carr Fire, with what was to be "temporary" permits for concrete recycling efforts associated with the Carr Fire cleanup permit. This new expansion would more than double the already heavy truck traffic and noise.

The middle Creek trail also crosses in this section of Iron Mountain Road and this will be an increased risk to all of the trail traffic that Redding and Shasta county push so much!

There is already "equipment" noise and air pollution from the operation all day long and the yearly blasting and increased light will be detrimental to the community and the property values as well as detrimental to the air quality. I know this is not part of the "Visit Redding" plan! Please consider the negative impacts this will have!

Here is some literature to consider on the importance of the spawning area in Middle Creek.

1. Middle Creek Local Implementation Plan, April 1995, Natural Resources Conservation Service.
2. Middle Creek Watershed Best Management Practices Intermediate Conclusions, June 1994, Western Shasta Resource Conservation District
3. 1997 Revised Draft Anadromous Fish Restoration Program Plan (Adopted as Final January 9, 2001) U. S. Fish and Wildlife Service.
4. 1993 Erosion and Sediment Control Study: Middle Creek Watershed, USDA, Soil Conservation Service.

Thank you,
Cheri Watt

10565 Iron Mountain Road
Redding, CA 96001

P.O. Box 71
Shasta, CA 96087

--

Cheri Watt

FW: Written Scoping Comments

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 5:05 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Mark Endraske
Sent: Monday, March 22, 2021 5:04 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Cc: Mark and Amy Endraske <endraske4@gmail.com>
Subject: Written Scoping Comments

Tara Petti,

I share the concerns of my local community about the proposed Crystal Creek Aggregate Inc expansion project. This letter addresses the issues in the order they appear in the Environmental Initial Study (EIS) posted on Shasta County's website.

Aesthetics: The community is concerned that with the 24-hour operation of the plant, light pollution will be a problem. It has already been identified that light pollution will be an issue in the EIS, and lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation. The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night. The permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, a night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day.

Air Quality: Local residents are concerned that the new asphalt plant would release harmful air borne pollutants, even with the cleaner propane-fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves¹. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens of more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen². There

is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main "smell" component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects. Due to the quarry's location, the wind in the Keswick Canyon is usually stronger than the rest of the Redding Valley. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union Elementary School, just to name a few. 1 Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005 2 Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110 People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move.

Biological Resources: The EIS has indicated that the California Department of Fish and Wildlife had comments for the project to look at special-status species, habitat surveys, impacts on California Endangered Species, and additional monitoring and studies for wildlife and aquatic resources. See additional biological resource concerns in the Hydrology and Water Quality section.

Energy: Local residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like manzanita and oak, which surround the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire. Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Hazards and Hazardous Materials: See the Energy section for concerns about propane and petroleum storage.

Hydrology and Water Quality: The surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double its output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water and any storm runoff will carry a higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter. The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property. The quarry has a history of not watering its existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue. The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few undammed tributaries to the Sacramento River in the Redding area. Any sediment from the quarry that is not captured by the settling ponds will make its way into the Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon³.

Land Use and Planning: While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the

evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Noise: Allowing Crystal Creek to build an asphalt plant would have a massive impact on the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. However, both operations currently only operate during the workweek, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity but also at night when ambient noise levels are at their lowest. With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise, the engines produce working hard to pull the heavily loaded trucks up the hill. While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California, a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more⁴. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation: The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Further afield, there is the paved Middle Creek and Sacramento River trails, and Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this 3 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226- Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd, 2021 4 Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020 part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source, but more importantly, by introducing very strong odors into an area people seek to come to, primarily to get into the woods and enjoy the fresh air.

Transportation: The EIS has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry. The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear⁵. If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under-designed for the truck movements it is experiencing. The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue.

Wildfire: The local community has concerns about the new asphalt plans impact on wildfires as outlined above in the Energy section. In addition to the above, the community is worried that the plant itself might be the cause of a wildfire. In 2018 Northstate Asphalt's plant caught fire and severely damaged the plant. The concern the

community has is there are fewer fire breaks around Crystal Creek Aggregate than there are around Northstate Asphalt's facility on Clear Creek Road in Southwest Redding.

Concerns not fitting into the above categories: The community has a couple of other concerns that do not fit nicely into the above EIS categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatment systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes 5 Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020 4,000ft away, the proposed plant with no additional treatment systems will have a much bigger impact on homes only 1,000ft away⁶. In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase in noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase in nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts and will be a very large increase compared to the current nighttime conditions. The local community also questions the need for a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need for a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have the unrealized capacity and are located in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion: The above is a list of concerns the local community has about the proposed expansion project. While the local community has concerns about some aspects of the proposed quarry expansion, and they want to make sure the quarry implements measures to mitigate those concerns, the community has no major problems with the proposed increase in volume, size, and time frame of mining at the quarry. However, the local community is strongly against the proposed addition of a new asphalt plant within the existing quarry. The local community is concerned the proposed plant will increase light pollution, noise, and dust from the quarry, especially at night. The plant will also introduce high levels of air-borne pollutants and noxious odors into an area people seek to come to enjoy the outdoors. This will harm the local recreation community and will see less money spent in the area, either personal money or government-funded recreational improvement projects. The new plant will also have a negative impact on the road network surrounding the quarry, both from increased traffic causing vehicle/bike conflicts, and from increased wear and tear on the existing roads. In addition, the plant will introduce large concentrations of flammable material in an area that is at high risk for wildfires. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact on the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

Sincerely,

--

Mark Endraske, MA
15639 Rock Creek Rd.
Redding, CA 96001

FW: Asphalt plant permit

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/23/2021 8:21 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Joanne Brady
Sent: Monday, March 22, 2021 5:28 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Asphalt plant permit

Dear Tara-

We are strongly opposed to the expansion and asphalt plant currently being considered at Crystal Creek Aggregate quarry. This would significantly degrade the quality of the environment and create foul and carcinogenic air pollution in the surrounding areas. The increase in truck traffic and the merging onto Highway 299 is going to be a safety issue. The resulting noise and dust will result in a drop in property values as these communities recover equity in their homes since the Carr Fire of July 26, 2018.

We have lived in "old" Shasta since December of 1986. Our home survived the Carr Fire due to my efforts to extinguish multiple flash points on that disastrous day. We have already signed petitions opposing this project.

These communities have suffered enough harm already and we ask that this permit be denied so we may maintain our quality of life as we struggle to recover.

Concerned Shasta County citizens,

Alan and Joanne Brady
11352 Benson Drive
Shasta, Ca.

FW: Comments for the EIR - Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/23/2021 8:24 AM

To: Bruce Grove <bgrove@shn-engr.com>

 1 attachments (26 KB)

Comments Asphalt Plant Hoines.docx;

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Josh Hoines
Sent: Monday, March 22, 2021 6:07 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Comments for the EIR - Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001)

Dear Tara Petti,
Please find attached my concerns for the expansion of the Crystal Creek Aggregate plant.

Thank you for the opportunity to comment.
Josh Hoines

Josh Hoines
3442 Footbridge Ct.
Redding, CA 96003

Tara Petti, Associate Planner
Shasta County Department of Resource Management,
Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001

Dear Ms. Petti,

I am very concerned of the **long-term adverse and major irreversible impacts** that the Crystal Creek Aggregate Inc. expansion would have on the communities of Shasta, Keswick, and northwest portions of Redding. We purchased our home, in part for the views and in part for our proximity to the recreation opportunities afforded by living in the River Ridge Terrace Neighborhood. I fear this expansion, if approved will eliminate my views both day (air quality) and night (light pollution), diminish my property values and community aesthetic, as well as add insult to injury for a community that is just beginning to recover from wildfire. These communities and neighborhoods can become a thriving residential community intermixed between National Park, Bureau of Land Management, and State Park recreational lands. This area, if carefully planned, could provide outdoor recreational opportunities for connecting the local communities and serve as a destination for visitors and business opportunities for outdoor recreation guides and equipment companies.

Light Pollution: The proposed 24-hour operation of the plant, would have long-term and major adverse impacts on light pollution to the local communities and neighborhoods, State Park, Bureau of Land Management and National Park lands – all of which are within a 20 mile radius of the plant. The EIR had already identified light pollution as an issue, with the mitigation of lights that don't let light escape upwards will be installed. This is not a helpful constraint as the community is worried about the light spilling sideways. The lumberyard in the same vicinity recently installed "non-light polluting" lights. While the new lights didn't send any light upwards, the local community had to ask the lumberyard to turn the lights off after business hours because the light was so intense it appeared to still be noon outside. The community is concerned that the same types of lights could be used at the new asphalt plant but would not be turned off due to 24-hour operation. The other source of concern with light pollution comes from all the trucks that would use the asphalt plant at night. All of which would have a long-term adverse and major impact on the star gazers that enjoy the night sky at Whiskeytown National Recreation Area, where the Night Sky Program views and environments are among the critical park features the National Park Service protects. Night sky protection enhances qualities of solitude and undeveloped wilderness character that animals depend on for survival, park visitors seek for connections, and many cultural-historical parks require for

preservation. In this regard, the NPS recognizes a naturally dark night sky as more than a scenic canvas; it is part of a complex ecosystem that supports both natural and cultural resources. Many community members enjoy going up to South Fork Mountain and the Shasta Divide for evening walks and to enjoy the night sky and look out over the community of Redding, including the Sun Dial Bridge, which casts a lovely artistic glow over the Sacramento River. The lights and sounds from a 24-hour operation – in direct view of this National Park land – would have an overall adverse impact on the experience.

Also, the permit is requesting to produce asphalt in volumes that would easily generate 70 trucks, or more, per night driving into and out of the plant and along the local roads. There is no exit from the plant that does not send the trucks through residential neighborhoods, introducing light pollution in new locations away from the proposed plant at all times of the week and day. This action would have a long-term adverse impact on light pollution for the local community and surrounding recreation lands.

Air Quality: Additionally, and more significantly, the residents of northwest Redding, Shasta and Keswick are concerned that the new asphalt plant would release harmful airborne pollutants, even with the cleaner propane fired plant. Compared to the other major source of air pollution in the area, wood stoves, the proposed asphalt plant will produce more polycyclic aromatic hydrocarbons than 300 wood stoves, more sulfur dioxide than 7,000 wood stoves, more cadmium than 63,000 wood stoves, and more volatile organic compounds than 39 wood stoves. Even with equipment keeping air pollution below the EPA regulations for asphalt plants, there will still be a massive increase in air pollutants (not including dust) coming from the proposed asphalt plant when compared to existing sources of air pollutants in the area. There are dozens more studies showing asphalt plants can cause health issues for the surrounding communities, including respiratory issues, cancer, skin tumors, and an increase in the suicide rate caused by asphalt fumes. The National Institute for Occupational Safety and Health designates long exposure to asphalt fumes as an occupational carcinogen. There is also concern about the smell from the asphalt plant. While the asphalt would be mainly stored in a silo, a silo is not airtight, and once the product is loaded into trucks, there is no control mechanism to reduce or capture any hydrogen sulfide, the main “smell” component of asphalt, as the trucks drive out of the quarry, through the residential neighborhoods, and towards their paving projects. Again, with increased trails and recreation within the area, people riding mountain bikes, hiking, and enjoying the surrounding State Park and Department of Interior lands would be increasingly exposed to such activities.

Due to the quarry’s location, the wind in Shasta is usually stronger than the rest of the Redding Valley – mostly in the mornings and evenings. The wind would carry any smell or pollutants to larger communities including Old Shasta, the new Salt Creek Subdivision, and the Shasta Union

Elementary School, just to name a few. 1) Blue Ridge Environmental Defense League, Asphalt Plant vs. Wood Stove Pollution, October 20, 2005. 2) Health Effects of Occupational Exposure to Asphalt, DHHS (NIOSH) Publication Number 2001-110. People also living in the area have been hospitalized due to smoke inhalation damage during the Carr Fire. The concern is the quarry has a history of not complying with dust control measures. The dust clouds the quarry generates already exacerbates people's lung issues. With more traffic and new sources of pollutants from the asphalt plant, the community believes that people with existing lung problems surrounding the quarry will have even more issues and might have to move.

Wildfire: Also, residents are concerned with the asphalt plant introducing large petroleum and propane tanks into a known high wildfire danger area. Wildfires can easily reach temperatures in excess of 1,400 degrees Fahrenheit especially with hot burning fuels like chaparral and knobcone pine, which surrounds the quarry site. There have been recorded instances of fires burning hot enough to explode propane tanks from over 100ft away due to BLEVE (Boiling Liquid Expanding Vapor Explosion) even with working safety valves. While the petroleum tank would not be pressurized, it is susceptible to spontaneous combustion if exposed to a hot enough fire. Both tanks pose a safety hazard during a fire, not just because they can catch on fire, but because both stored commodities can explode and send the tank, and more flammable material, flying up to 2,500ft away. This would spread the fire and potentially harm both fire personnel and nearby structures.

Water Quality: In regard to water quality, the surrounding community is concerned the submitted permit does not include any plan to reduce the turbidity of water runoff. The quarry site currently has 2 settling ponds. Settling ponds allow the water to be still enough to allow fine particulate matter (dirt/dust) to settle out and allow clean water to exit into the local streams. The quarry is proposing to double their output, which also means doubling the amount of dust that is generated. To combat the dust for air quality, more water will need to be sprayed onto the roads to keep the soil damp. Both this water, and any storm runoff, will carry the higher amount of dust into the settling ponds, which were not sized to accommodate the higher amount of particulate matter. The permit also proposes to expand the area of land worked for aggregate. This increases the area of bare dirt, which would also accumulate more suspended particulate in any runoff on the property. The quarry has a history of not watering their existing roads well enough. Trucks leaving the quarry have been known to track dust all the way from the quarry's entrance to the intersection of Iron Mountain Road and Highway 299. Doubling the number of trucks into and out of the quarry will increase this issue.

Threatened and Endangered Species: The permit application also does not identify that some of the site's runoff drains into the Middle Creek Watershed. Middle Creek is considered Central Valley Steelhead Critical Habitat and is one of the few un-dammed tributaries to the

Josh Hoines
3442 Footbridge Ct.
Redding, CA 96003

Sacramento River in the Redding area. Central Valley Steelhead is a Federally Threatened species with several millions of dollars already invested into recovering the species. Any sediment from the quarry that is not captured by the settling ponds will make its way into the Sacramento River and impact the Spring/Winter run of Chinook Salmon, Steelhead, and Green Sturgeon.

Pacific fisher is a species of concern in Shasta Count and I have personally caught a few on my wildlife game camera in Shasta. This species would undoubtedly be impacted by noise, light, and traffic within the area because of the proposed actions.

Land Use and Planning: While the EIS is technically correct that the proposal will not split existing communities and the proposal of an asphalt plant is within zoning specifications, it doesn't look at the larger picture. The location of the quarry is in an interesting location. While the quarry is zoned for mining, it is surrounded by residential zoning. There is no way for trucks to leave the quarry without traveling through a residential neighborhood before entering a highway. In some cases, trucks pass within 20ft of residential structures. While everyone living in the area knows the quarry has trucks driving in and out all day long, the quarry is closed in the evenings and weekends. This allows residents the opportunity to unwind and relax without the noise, dust, lights, and commotion of an operating quarry. If the asphalt plant is constructed, trucks will be driving through residential neighborhoods all night long, including weekends. While we understand that mining resources are not placed in ideal zoning locations, and the mining needs to be located where the material resource is, having an asphalt plant in the middle of a residential area is not the best land use. The asphalt plant is not required to be located in the same location as where the aggregate is mined.

Allowing Crystal Creek to build an asphalt plant would have a long-term adverse and major impact to the noise levels in the surrounding areas. The current quarry and adjacent lumberyard operations do generate elevated noise compared to surrounding levels. Bird surveys conducted 20 miles away have been interrupted by the sound of this plant. Even in consideration that both operations currently only operate during the work week, and during normal business hours. If the asphalt plant would be constructed, it would introduce new noise pollution, not only during the day for normal activity, but also at night when ambient noise levels are at their lowest – impacting all of the surrounding residents and recreational areas. With the new plant, there will also be an increase in truck traffic, specifically at night. This introduces additional noise sources. Most of the truck traffic from the quarry will be heading South on Iron Mountain Road to access Highway 299. On Iron Mountain Road between the quarry and Highway 299, there is a steep valley the road descends down into the bottom of before continuing up the other side. This grade generates additional noise from trucks, both from braking, and using engine brakes, on the way down, and from increased noise the engines

produce working hard to pull the heavily loaded trucks up the hill. While primarily aimed at roadways, Title 23, Part 772, Code of Federal Regulations lays out the maximum decibels for different land use areas. For a residential area (Activity Category B) the maximum decibel level should only be 67 decibels (dB). In California a substantial noise increase is considered to occur when the project's worst noise level exceeds the existing noise level at a comparable time by 12dB or more. The community is concerned that a new asphalt plant operating at night would produce more than 67 decibels and have an increase of 12dB or more compared to the current nighttime noise level.

Recreation: The application states there is no County park near the quarry site. This is true. However, adjacent to the property is BLM land which is used for recreation, as well as nearby State Park land and Whiskeytown National Recreation Area. There is a trail called French Fry which circles the quarry and is heavily used by both mountain bikers and hikers. Also, there is the paved Middle Creek and Sacramento River trails – which connects to the Sun Dial Bridget. There is also the Keswick Lake recreation area, all within a mile of the proposed asphalt plant. Recreation in this 3 226.211 Critical Habitat for Seven Evolutionarily Significant Units of Salmon, Part 226-Designated Critical Habitat, Title 50: Wildlife and Fisheries, March 2nd 2021 4 Traffic Noise Analysis Protocol, Caltrans, California Department of Transportation, April 2020 part of Shasta County is not manicured parks, recreation is being out in the woods. The asphalt plant would disrupt this recreation by introducing a new noise source and light pollution – let alone impact air quality for all of those seeking to enjoy the outdoors.

Transportation and Safety: The EIR has already identified most of the transportation issues the local community is worried about. Increased traffic at Iron Mountain Road and Highway 299 intersection, narrow existing roads, and increased truck traffic in conflict with road and mountain bikes on Iron Mountain Road. Two things not identified in the EIS that should be studied in the EIR is the structural section of Iron Mountain Road and traffic impacts at the intersection of Iron Mountain Road and the quarry. The concern with the structural section is the original road was not designed or built to handle the increased Traffic Index (TI) that is projected to be generated by the new asphalt plant. The road might not have a thick enough layer of asphalt or aggregate base to handle the increased loading and the road will prematurely wear . If the road does wear, this places more strain on Shasta County Public Works to maintain a road that is now under designed for the truck movements it is experiencing.

The second issue is the increased traffic at the intersection of Iron Mountain Road and the entrance to Crystal Creek Aggregate. In current operating conditions, trucks already stack up on Iron Mountain Road waiting to turn left into the quarry during the morning hours. There is also the issue that the paved entrance into the quarry is no longer present. Just the current amount

of truck traffic into and out of the quarry has obliterated the entrance road in the past ten years. This has led to trucks tracking dust and gravel onto Iron Mountain Road from the access road into the quarry. More trucks will just further exacerbate this issue.

Additionally, slow gravel trucks pulling out onto Highway 299 to head East at Rock Creek and Iron Mountain Mine, have not been able to move fast enough for oncoming traffic. There is a passing lane going uphill at this location – on a curve – right where trucks pull out to head downhill and they are often not fast enough to anticipate the traffic heading uphill and are focused on passing one another. These are both locations of frequent accidents on Highway 299. Having increased truck traffic at these locations is a HUGE concern for people planning to head to the coast, or Shasta State Park, or Whiskeytown Lake on a busy weekend. The safest option would be to install a traffic light at one of these intersections to ensure safety, which would require concurrence and support from Caltrans.

Additionally, before the Carr Fire, Caltrans and the neighboring land management agencies and community were exploring opportunities to expand recreation in this area and to connect Redding's trails with Shasta State Historic Park, Bureau of Land Management, and National Park lands. This was a time when the local community was very excited about making improvements for a healthier community and to make visitation and travel more enticing. An new 24-hour asphalt plant instead of new trails, more open space, and well designed and fire safe-home is a big disappointment and would have an long term adverse consequence overall on the community and the County.

Concerns not fitting into the above categories: The community has a couple of other concerns that do not fit nicely into the above EIR categories. The first concern is the proximity of the proposed plant to adjacent homes. There are three existing asphalt plants in the Redding area. One plant is operated by J.F. Shay Co. Inc. at their Fawndale quarry. The two other plants are located on Clear Creek Road and are operated by Tullis Inc./ Northstate Asphalt and J.F. Shay Co. Inc. The closest homes to these plants are over 4,000ft away. These homes have known issues with the existing asphalt plants on Clear Creek Road creating dust and unpleasant smells and have reported the plants to the Shasta County Air Quality Control multiple times. In addition to a dust capture system, these two plants have additional exhaust treatment systems to try and reduce the smell of Hydrogen Sulfide and are still reported to the Air Quality Control Board for increased emissions. As shown in the submitted permit, Crystal Creek Aggregate does not show that these additional treatments systems will be installed on the new asphalt plant, allowing more Hydrogen Sulfide to be emitted. This is concerning since the proposed plant is only 1,000ft away from adjacent homes. If the existing asphalt plants with additional treatment systems negatively impact homes. Pavement Engineering, Chapter 600, Highway Design Manual, Caltrans, December 31, 2020 4,000ft away, the proposed plant with no additional

Josh Hoines
3442 Footbridge Ct.
Redding, CA 96003

treatment systems will have a much bigger impact on homes only 1,000ft away. In the discussion sections of the EIS, the author implies that the new asphalt plant will not produce a large increase of noise, dust, and light pollution compared to the existing operations. During the day this is true. The concern comes from the fact the asphalt plant will be operating 24 hours a day and will generate a massive increase of nighttime noise, dust, and light pollution. Combined with the fact that most of the major paving jobs in the Redding area occur at night, the main impacts of the plant are nighttime impacts, and will be a very large increase compared to the current nighttime conditions.

The local community also questions the need of a new asphalt plant in the Redding area. There are already three plants in operation, and the existing plant operators admit that unless they are providing asphalt for a major paving operation (usually a Caltrans operation at night that only occurs three times a year) they are not at capacity and can always provide more asphalt for additional projects. As such, the local community does not see the need of a new asphalt plant to supply the demands of the local paving industry. The existing asphalt plants still have capacity and are in locations better suited to heavy industrial operations than the location of the Crystal Creek Aggregate quarry.

Conclusion: The above is a list of concerns the local community and I have about the proposed expansion project. The proposed actions would have long-term major and adverse impacts to the local community, surrounding State Park and Department of Interior lands, in terms of noise and light pollution, safety and traffic, and air quality – and overall quality of life for those that live near the plant. The community does not believe the proposed asphalt plant will be placed in a location that has minimal impact to the surrounding areas. The community believes the plant should not be built at this location because of the reasons outlined above.

There is so much opportunity to expand on the recreational opportunities in Shasta and Keswick – especially because these areas reside between Bureau of Land Management, State Park and National Park lands. This is an area for Shasta County to carefully plan a new community for making a healthier community, with hiking and bike trails, open space, clean air, and vistas of the city of Redding. The concept of expanding an asphalt plant in this area to a 24-hour operation is just...insult to injury. The County has a golden opportunity to make this a destination for visitors wanting to enjoy outdoor recreation and an asphalt plant would lower the quality of living for existing resident, impact surround land management agencies, and squash recreational experience and opportunities for the future.

Sincerely,
Josh Hoines
3442 Footbridge Ct.
Redding, CA 96003

FW: Asphalt plant

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/23/2021 8:29 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Bruce Muller
Sent: Monday, March 22, 2021 9:33 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Asphalt plant

I am a resident of West Redding, just a few miles from the proposed asphalt plant. Both my wife and I are in our 70's and sensitive to environmental issues. Both the fumes released into the atmosphere and the damage done to the water table could severely affect our health.
We would appeal to the county to NOT put in an asphalt plant.

Thank you

Bruce Müller
10311 Newfound Way, Redding, CA 96001

--
Bruce

FW: Quarry Expansion

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/23/2021 8:29 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: gayleen gorder
Sent: Monday, March 22, 2021 10:37 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Quarry Expansion

Hello,

I live in Lake Redding Estates and I would like to express my opposition to the Chrystal Creek Aggregate's proposed quarry expansion and asphalt plant. I am very concerned about the air quality, noise and other ramifications that this project will have.

Thank you,

Gayleen Gorder

FW: The Crystal Creek Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Tue 3/23/2021 8:30 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From: Sandy Harrison

Sent: Tuesday, March 23, 2021 12:22 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Cc: Sandy <sandydachs@gmail.com>

Subject: The Crystal Creek Expansion Project

Dear Ms. Petti

I am writing to you in concerns about the proposed Crystal Creek Expansion Project.

I am a Registered Nurse and my speciality area is Cardiac Rehabilitation. My experience is in an accredited Cardiac Rehab program and for this designation we aseess Cardiac risk profile.

The questions asked of our patient include how far they live from a major road. Air quality has such a direct impact on Cardiovascular health that it has become part of our risk analysis.

I would be happy to go into more detail with you if that would be of assistance to you. I understand you have public agencies that can provide you with data. As a citizen and resident it means a great deal that you have the data that will support a healthy community. Please address air quality and particulate matter.

Outdoor living is a part of the history and culture of Redding and we see this in the amount of trails developed in our community. In order to have a community that uses the amenities of trails and engages in exercise it has to be safe to commute on roads that lead to trails. Truck traffic precludes people from wanting to use our roadways.

I appreciate that you have many perspectives to consider and research.

If I can help you in the perspective of health risk considerations and Cardiovascular risk please feel free to contact me.

Thank you for your efforts to address the many question this plant expansion has generated.

Sincerely,
Sandy

Sandy Harrison RN, BSN
Cardiac Rehabilitation RN

FW: No Asphalt plant Crystal Ck Aggregate

Tara Petti <tpetti@co.shasta.ca.us>

Wed 3/24/2021 8:24 AM

To: Bruce Grove <bgrove@shn-engr.com>

This came in today. Not sure what to do with it.

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

-----Original Message-----

From:

Sent: Tuesday, March 23, 2021 10:36 PM

To: Tara Petti <tpetti@co.shasta.ca.us>

Subject: No Asphalt plant Crystal Ck Aggregate

Importance: High

To All Responsible Parties:

The Asphalt plant purposed in Keswick on Iron Mountain Road is a really BAD IDEA AND A BAD PLAN.

This area is already impacted with toxic run off from Iron Mountain Mine and the proximity, within two miles of Keswick Dam and the Sacramento River would pollute our water, air quality, and environment. Iron Mt.

Mine is a Superfund toxic site and the third most toxic site in California; it overflows during extreme rain.

1. An asphalt plant in this location would further pollute this area and increase toxicity in the surrounding area and the water we drink.

Old Shasta is due south of Crystal Creek Aggregate location. Shasta State Historical Park, Shasta Union Elementary School, Residents of our county are here. North winds would bring toxic air quality to a gateway to our community, impact children and teacher's health, reduce visitation to a valuable historic treasure. It would also set Shasta county up for law suits related to the approval of poisoning our people, our overall environment.

2. impact children and teacher's health, reduce visitation to a valuable historic treasure and poison people.

3. It set Shasta county up for law suits related to the approval of poisoning our people, our overall environment.

More recently, a subdivision has been recently built in the direction of Crystal Creek Aggregate and an asphalt plant will negatively affect real estate sales.

4. Crystal Creek Aggregate asphalt plant will negatively affect real estate sales.

This asphalt plant would create serious impacts on residents, wildlife, and the environment in Keswick, Old Shasta, and Westside trails and neighborhoods -- essentially anything downwind and downstream. This is not an attempt of "not in my backyard" response. It is a cry to protect this area from bad planning that doesn't stop businesses that place profit over public health and quality of life. There is a better place for this type of business, with mitigation of negative affects stringently applied.

I trust you will act in the best interest of our people and progress, by denying an asphalt plant as this location.

Thank You,
Linda Miller

Other Organizations

FW: Crystal Creek

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 2:44 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Mike Jones <mjonesrdg@gmail.com>
Sent: Thursday, March 18, 2021 9:03 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek

Please add our name(s) to the list of opponents of the placement and operation of the proposed Crystal Creek Asphalt plant..

Mike Jones, Pres
Stream And Greenways Alliance

FW: Request for Biological Survey: Crystal Creek Aggregate

Tara Petti <tpetti@co.shasta.ca.us>

Thu 3/18/2021 3:24 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Shasta Environmental Alliance <ecoshasta@gmail.com>
Sent: Thursday, March 18, 2021 12:31 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Cc: Paul Hellman <phellman@co.shasta.ca.us>
Subject: Request for Biological Survey: Crystal Creek Aggregate

Tara Petti
Shasta County Planning Department

Re: Crystal Creek Aggregate, Inc. Use Permit Amendment (UP-19-0007); Reclamation Plan Amendment (RA-19-0001)

Dear Tara,

I would like to see a copy of the Biological Resource Survey for the Crystal Creek Aggregate Expansion and Asphalt plant as it is not attached to the initial study. If you can get a copy to me by Friday March 19 that would give me time to properly provide comments on the project.

Sincerely,

David Ledger
President
Shasta Environmental Alliance
530-355-8542

FW: Crystal Creek Aggregate, Inc. Use Permit Amendment (UP-19-0007); Reclamation Plan Amendment (RA-19-0001)

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 10:22 AM

To: Bruce Grove <bgrove@shn-engr.com>

 1 attachments (85 KB)

SEA COMMENTS CRYSTAL CREEK AGGREGATE AND ASPHALT PLANT.docx;

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Shasta Environmental Alliance <ecoshasta@gmail.com>

Sent: Monday, March 22, 2021 8:08 AM

To: Tara Petti <tpetti@co.shasta.ca.us>

Cc: David Ledger <dledger@sbcglobal.net>

Subject: Crystal Creek Aggregate, Inc. Use Permit Amendment (UP-19-0007); Reclamation Plan Amendment (RA-19-0001)

Dear Tara and Shasta County Planning Department

Attached are the comments of our organization regarding the Crystal Creek Aggregate Project in Keswick. Crystal Creek Aggregate, Inc. Use Permit Amendment (UP-19-0007); Reclamation Plan Amendment (RA-19-0001)

Sincerely,

David Ledger
President
Shasta Environmental Alliance
530-355-8542



Shasta Environmental Alliance

P.O. Box 993777 • Redding, CA 96099 • ecoshasta.org

March 22, 2021

Tara Petti, Planner
Shasta County Planning Department
1855 Placer Street Suite 103
Redding, CA 96001

RE: Crystal Creek Aggregate, Inc. Use Permit Amendment (UP-19-0007); Reclamation Plan Amendment (RA-19-0001)

Dear Ms. Petti,

This letter is in response to the Crystal Creek Aggregate Plant Use Permit RA 19-0001 and lists a number of concerns our organization has with the project.

One overriding concern we have is the placement of an asphalt plant, a heavy industry and polluting source in an area that is largely surrounded by a natural blue oak/gray pine woodland. In particular BLM lands with recreational trails are on three sides of the Project of which the air, water, wildlife and human enjoyment will be detrimentally affected. It is also close to Keswick, a low-income area which brings concerns of economic equity in the placement of the plant. Furthermore, we have concerns that while this is zoned industrial, if the Project is approved this will result in future polluting industries in this largely rural residential area as this project could be used as a precedent.

AIR QUALITY

We are concerned about all pollutants emitted by the project from the asphalt operation of the plant as well from increased truck traffic. We feel the following questions should be included in the DEIR.

What will be the cumulative effects of the Project on ozone pollution and particulate matter PM(10) and PM(2.5) particularly in the local area. These pollutants have been increasing in Shasta County.

What health effects could these and other pollutants from the project have on local residents?

What odors emitted from the project by the asphalt plant section will significantly affect to the surrounding neighborhood?

What effects will the pollutants have on adjacent trail users, even if transitory, considering deep inhalation during uphill climbs?

What negative effects will this plant close to Shasta County's renowned trail system have on tourism, not only to the nearby trails, but to the reputation of Shasta County's trail system?

Because the town of Keswick and the immediate area has a large low-income population, consideration of the project to take into consideration economic fairness to ensure that polluting industries are not unfairly sited in low-income areas?

BIOLOGICAL RESOURCES

After a biological resource study is completed, what negative effects will the Project have on rare, threatened, endangered species, and species of special concern?

The DEIR should take into consideration and address animal corridors and nesting sites as the noise, lights and human activity will have a negative effect on wildlife including deer, coyotes, foxes, bats and birds. What will be the immediate and cumulative effects of these disturbances be to wildlife?

Insect populations in the world have taken dramatic declines in the last few decades and the effect of lights on insects should be taken into consideration. Artificial lite attracts insects and can adversely affect their reproduction and circadian rhythms as well as prematurely add to their death due to energy expended when attracted to them. Even though the lights will be directed downward, the effects on insects should be considered. The DEIR should address the effects of light on the insects and all animals near the project. What will the effects of the lights have on insects specifically?

Our questions should not be made light of by excuses similar to those who are cutting down the Amazon Forest that there are millions and millions of hectares of forest left. The project should be analyzed as to the immediate and cumulative affects the Project will have on biological resources. CEQA does require cumulative affects to be taken into consideration.

HYDROLOGY AND WATER QUALITY

The project will be doubling its aggregate output to 500,000 tons per year. As this aggregate will be rinsed using recycled water stored in onsite ponds, we have concerns about the chemical buildup of any toxic metals or other substances in these recycle ponds over the years and decades and believe there should be ongoing monitoring of the chemical concentrations in the ponds and if there is any pollution of the water table.

Will the water quality of the ponds be tested on a regular basis and if so, how often?

Will any test of leakage of toxic metals of chemicals into the water table be taken and how will this be tested how often will these tests be taken?

If the water is found to be toxic, how will birds and other animals be protected as well as the water table?

What is the probability of the water in the ponds overflowing during high rain events into adjacent streams?

What protections will be in place to prevent polluted water overflowing into streams?

GREENHOUSE GASES

Although it was never presented to the Shasta County Board of Supervisors, Shasta County does have a Regional Climate Action Plan and this plan should be taken into consideration.

Would the Project be in violation of the draft Regional Climate Action Plan were it to have been officially adopted?

NOISE

The EIS states that noise could have a potentially significant impact and that future studies will be done. We feel that the noise levels will have a significant impact on animals, nearby residents and recreational users of the nearby Middle Creek Trail, Trail 58 and the French Fry Trail, all immediately adjacent to the Project although Trail 58 is across Middle Creek. The noise could also significantly affect adjacent residents.

What decibel levels will there be adjacent to the Project from the blasting noise, the operation of the asphalt plant and from the increased aggregate mining?

Studies should be completed as to determine the adverse effects the Project will have on the above issues. To summarize: What will the effect of noise be on wildlife, nearby residents and users of the adjacent hiking and biking trails? Will this noise on these trails adversely affect the tourism of the area? Will the noise adversely affect the sleep and psychological stress of nearby residents?

TRANSPORTATION:

Increased truck traffic could have a significant affect on the safety of pedestrians and bicyclists on Iron Mountain Road. While the road could be widened, accidents could increase at the Middle Creek Bridge on Iron Mountain Road at the bottom of a steep grade in both directions.

Will the bridge crossing at Iron Mountain Road be widened to provide safety for many bicyclist using the road?

The mission of Shasta Environmental Alliance (SEA) is to protect and preserve the flora, fauna, land, air and water of the Upper Sacramento River Watershed through advocacy and education. We are a non-profit (501(c)(3) organization and have 19 supporting organizations.

Sincerely,

David Ledger, President
Shasta Environmental Alliance

FW: Crystal Creek Aggregate Expansion Project EIR scoping comments

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 3:39 PM

To: Bruce Grove <bgrove@shn-engr.com>

📎 1 attachments (19 KB)

CCA Expansion Project March 19.docx;

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: MaryAnn M <mamcfree@gmail.com>
Sent: Friday, March 19, 2021 3:37 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Cc: NSCA Steer Comm <nscasteercom@googlegroups.com>
Subject: Crystal Creek Aggregate Expansion Project EIR scoping comments

Ms. Petti - On behalf of North State Climate Action (NSCA), a grass roots volunteer citizen's group based in Redding since 2018, please accept the attached EIR scoping comments on the proposed Crystal Creek Aggregate Expansion Project. It is our understanding that the commenting period is open through Monday, March 22, 2021.

Thank you for your consideration of these comments from NSCA.

Sincerely,

Mary Ann McCrary
Steering Committee Member
North State Climate Action
<https://www.nsclimateaction.org>

Tara Petti, Associate Planner, Shasta County Department of Resource Management, Planning Division
1855 Placer Street
Redding, CA 96001

March 18, 2021

Email: tpetti@co.shasta.ca.us

Subject: Public EIR Scoping Comments for the Crystal Creek Aggregate Expansion Project (General Plan Amendment 19-0003, Zoning Plan Amendment 19-0002, Use Permit Amendment 19-0007, and Reclamation Plan Amendment 19-0001)

Dear Ms. Petti:

North State Climate Action is pleased to provide the following scoping comments on the draft Environmental Impact Report (EIR) that is in preparation for the Crystal Creek Aggregate Expansion Project by Shasta County acting as lead agency with respect to CEQA requirements.

North State Climate Action (NSCA) has assessed the level of interest in addressing Climate Change in Shasta County by offering a North State Climate Plea or petition for local citizens to sign. In Pre-Covid 2019-20 over 800 people indicated their concern and support by signing the Plea. NSCA has an active Steering Committee engaged in climate education and positive engagement with County and City decision-making bodies.

NSCA can see a broad range of concerns regarding the expansion of aggregate mining and the addition of an asphalt plant near the community of Keswick within the Carr Fire burn scar and on wild land formerly managed by BLM. However, our comments will be limited to areas of concern with respect to Climate Change contributing factors and mitigation, the associated social inequities and the decline and potential loss of species diversity in Shasta County.

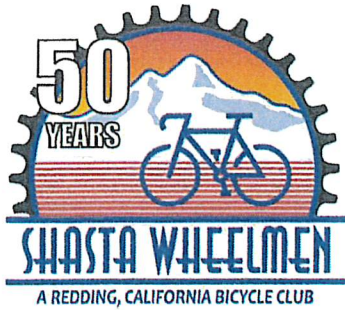
The following are the specific subject areas NSCA considers essential to be included and analyzed in the EIR in addition to those also essential topics likely to be identified by other commenters:

- All potential airborne emissions from the asphalt plant should be identified and quantified in terms of tons emitted per year of each. (**CO₂**, CO, **CH₄**, NO_x, SO₂, H₂S, PM₁₀, PM_{2.5}, VOC (volatile organic compounds), HAP (hazardous aromatic pollutants)).
- Additional PM₁₀ & PM_{2.5} to be emitted from the expansion of aggregate mining also expressed as tons per year.
- We recognize that emissions from increased truck traffic are regulated by the California Air Resources Board (CARB) as portable sources. However, we do want to see an analysis of the projected numbers and types of trucks that will be accessing the Crystal Creek Aggregate Mine site and the quantities of airborne emissions that can reasonably be expected from those vehicles such as **CO₂**, CO, NO_x, SO₂, PM₁₀, PM_{2.5}, and VOCs. We believe this information is needed to see the complete picture regarding how this Project will affect our County's ability to meet California's SB 398 goal to reduce GHG emissions 40% below 1990 levels by 2030.

- The Environmental Justice aspects of the imposition of this expanded mining and new asphalt plant upon adjacent pre-existing residential land uses and the nearby relatively economically disadvantaged rural communities in recovery from the Carr Fire. Will the Crystal Creek Aggregate Expansion Project cause disproportionate exposure to hazardous pollutants among local residents who already experience exposure to post-Carr Fire pollutants and ambient pollution from existing industrial sources? The effects of night-time lighting on health should be included in this analysis.
- The proposed expanded mining and asphalt plant operation is located within a short distance of Middle Creek and Rock Creek and within a couple miles of their confluences with the Sacramento River. The Sacramento River is the site of active salmon restoration and protection activities carried out over many years by multiple state and local agencies, and non-profit NGOs. How does mining expansion and the addition of asphalt processing affect our local community's efforts to save the natural salmon runs that are so important in the Redding and Shasta County area?
- The ecosystem effects of night-time lighting on insects, migrating birds, nesting birds, amphibians, etc. should be clearly presented. Due to the increasing pressures from climate change on natural ecosystems, avoidance of practices that negatively affect ecosystem resources for animals and plants is increasingly important.
- In California we have a goal to preserve and protect 30% of the land within state borders in a natural condition by 2030. What is the effect of this project on Shasta County's ability to do its part to reach that goal?
- The as yet natural land where Crystal Creek Aggregate proposes to expand mining is recovering from the Carr Fire. The shrubland ecosystem there is currently capable of sequestering carbon in biomass and in the soil. The loss of that carbon sequestering function should be quantified in the EIR in terms of tons of carbon per acre of mixed conifer shrubland per year.
- Would the remediation plan restore the entire area to the current natural capacity for carbon sequestration? What is the projected timeline for the remediation plan for how many acres in each phase? This information is needed to estimate the net loss of carbon sequestration that would be caused by the Project. The net loss of carbon sequestration plus the carbon (GHGs) footprint of the additional vehicles and industrial process would provide a more complete assessment of the impact of the Project on current and future efforts to mitigate Climate Change.

NSCA appreciates this opportunity to comment on the CEQA process for the Crystal Creek Aggregate Mine Expansion Project.

Mary Ann McCrary
 Steering Committee Member
 North State Climate Action
<https://www.nsclimateaction.org>
 Redding, California



Shasta Wheelmen, Inc.
info@shastawheelmen.org
www.shastawheelmen.org

March 15, 2021

Tara Petti
Shasta County Planning Department
Redding, CA

Dear Ms. Petti,

The Shasta Wheelmen Bicycle Club, a Redding cycling club founded in 1970 and numbering more than 100 members, wishes to express its concerns regarding the proposed expansion of Crystal Creek Aggregate off of Iron Mountain Road.

Iron Mountain Road and Keswick Dam Road are important and regularly used routes for our club members on rides to Old Shasta, the terminus of Iron Mountain Road (beyond the Chappie ORV and gun range areas) and for access to the Sacramento River trail across from Rock Creek Road. The project EIR suggests that with an asphalt operation there could be as many as 1,000 truck trips a day on those roads. That much truck traffic poses a serious potential risk to cyclists traveling those same roads. We note that the EIR makes no mention of putting in bike lanes as a mitigating option to such increased traffic.

At a minimum, we suggest that there should be a bike lane on Iron Mountain Road from at least the Middle Creek Road intersection to Keswick Dam Road. If there is to be this increased truck traffic, Keswick Dam Road should include a bike lane from its intersection with Iron Mountain Road to Quartz Hill Road or perhaps to Lake Boulevard, depending on the usual route of travel for trucks leaving or returning to Crystal Creek Aggregate.

In addition to increased traffic, we are concerned that the proposed asphalt production would result in significant air pollution and emission of toxic fumes. We have club members living near the proposed plant and they are especially concerned about the deleterious effects of the Crystal Creek expansion.

In summary, without significant additional mitigation measures, the Shasta Wheelmen club believes the project should not be approved. Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Doug Holt'.

Doug Holt, President

RECEIVED
SHASTA COUNTY

MAR 18 2021

DEPT OF RESOURCE MGMT
PLANNING DIVISION

FW: Public EIR Scoping Comments for the Crystal Creek Aggregate Expansion Project

Tara Petti <tpetti@co.shasta.ca.us>

Fri 3/19/2021 4:21 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Peggy Rebol <peggyrebol@gmail.com>
Sent: Friday, March 19, 2021 8:43 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Re: Public EIR Scoping Comments for the Crystal Creek Aggregate Expansion Project

Tara Petti, Associate Planner, Shasta County Department of Resource Management, Planning Division
1855 Placer Street, Redding, CA 96001

March 18, 2021

Email: tpetti@co.shasta.ca.us

Subject: Public EIR Scoping Comments for the Crystal Creek Aggregate Expansion Project

Dear Ms. Petti:

I wanted to voice my concerns about the proposed Crystal Creek Aggregate Expansion Project.

- This expansion of the mining operation area and addition of the asphalt plant translates to 24/7 operation of noisy equipment and release of a significant level of excess GHGs. Will ALL airborne emissions and pollutants be identified and levels quantified?
- The site is close to the Carr Fire burn scar. I don't know if the full impact of toxins released in the fire has been explored. How will this expansion add to levels of toxins in the soil and watershed? There is already a SuperFund site near the proposed site. Will the expansion add to the toxins already leaching into the soil and watershed?
- The expansion site is close to an economically disadvantaged community. How will the plant emissions affect the health of the residents?

- How will the expansion affect the health of people using the hiking and biking trails in the area?

- The proposed expanded mining and asphalt plant operation is located within a short distance of Middle Creek and Rock Creek and within a couple miles of the Sacramento River. All of these are streams where active salmon restoration and protection activities have been carried out over many years. How does mining expansion and the addition of asphalt processing contribute to our local community's efforts to save the natural salmon runs that are so important in the Redding and Shasta County area?

Thank you for allowing me to add my comments on the CEQA process for the Crystal Creek Aggregate Mine Expansion Project. I would appreciate being informed as this process moves forward.

Peggy Rebol
Executive Director, Whole Earth and Watershed Festival
reddingwewf@gmail.com; peggyrebol@gmail.com

Media Correspondence

FW: [EXT] RE: Crystal Creek Aggregate expansion proposal

Tara Petti <tpetti@co.shasta.ca.us>

Thu 2/25/2021 4:45 PM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Mike Mangas <mmangas@krcrtv.com>
Sent: Thursday, February 25, 2021 2:23 PM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Re: [EXT] RE: Crystal Creek Aggregate expansion proposal

Thank you very much, Tara.
Because of time considerations, I will have to summarize it.. I'll do the best I can!

Thank you again for your help,
Mike

+Mike Mangas
@mikemangas

On Feb 25, 2021, at 2:19 PM, Tara Petti <tpetti@co.shasta.ca.us> wrote:

CAUTION: This email originated from outside of Sinclair. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Mike,

Thank you for the inquiry. I think the last time we spoke was during the original scoping period for the Crystal Creek Aggregate Inc project. I hope you are doing well. I have summarized the County's standard notification process for discretionary projects and provided some specifics on the notification efforts for the current project.

The County uses a standard 300 foot buffer to generate notification mailing lists for all discretionary projects. Due to the size of the project parcel, the buffer was extended to include all immediately surrounding properties. In addition, the distribution list includes

members of the public who requested future notifications during the scoping period for the original project in 2019.

The County strives to notify all interested parties of discretionary projects. In this effort, and in addition to the notices that were delivered by mail to surrounding property owners, the "REVISED NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT (EIR); NOTICE OF 30-DAY EIR SCOPING PERIOD AND REQUEST FOR WRITTEN SCOPING COMMENTS; AND NOTICE OF PUBLIC SCOPING MEETING REGARDING THE CRYSTAL CREEK AGGREGATE EXPANSION PROJECT" was sent to the Record Searchlight, and is posted on the Resource Management website along with the Initial Study pursuant to the California Environmental Quality Act & CEQA Guidelines for early public consultation Section 15083.. In addition, the Notice of Preparation is posted with the County Clerk, and on the Office of Planning and Research State Clearing house website, as required pursuant to the California Environmental Quality Act & CEQA Guidelines Section 15082.

I hope this information answers your inquiry.
Best Regards Mike,

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Mike Mangas <mmangas@krcrtv.com>
Sent: Thursday, February 25, 2021 11:39 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Aggregate expansion proposal

Hi Tara-

I'm doing a story tonight on some folks in the Keswick area who aren't thrilled about the possibility of an asphalt plant nearby, but more importantly for the county, several of them say they were not notified about the scoping meeting and public comment, and in some cases they are virtually neighbors.

I just wanted to check in with you to see if you have anything to say about it. My cell phone number is below, either that or email are the best ways to reach me.

I left a message on your desk phone as well.

Thank you very much,
Mike

Mike Mangas
News Anchor/Reporter
KRCR-TV
755 Auditorium Dr.
Redding, CA 96001

mmangas@krctv.com

@mikemangas

Mobile: 530.356.8114

Office: 530.722.6410

FW: Crystal Creek Aggregate

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/8/2021 11:41 AM

To: Bruce Grove <bgrove@shn-engr.com>

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Tara Petti <tpetti@co.shasta.ca.us>
Sent: Monday, March 8, 2021 11:26 AM
To: Arthur,Damon <Damon.Arthur@redding.com>
Cc: Tara Petti <tpetti@co.shasta.ca.us>
Subject: RE: Crystal Creek Aggregate

Hi Damon. Sorry I missed your call. An Environmental Impact Report for the 2019 project was not completed, however Shasta County published a Notice of Preparation and held a public scoping meeting. The applicant redesigned the project in response to agency and public input and data analysis during the 2019 scoping period.

As a result, the project description was modified resulting in the following changes from the 2019 proposal:

1. A reduction of the proposed mining area, all proposed mining activities would occur within the boundaries of the existing approved mining area (approved in 2008), resulting in the elimination of the quarry expansion that was proposed in the 2019 project application.
2. A reduction in the amount of aggregate proposed to be mined. As a result, the number of proposed truck trips is reduced from the number of truck trips proposed in 2019.
3. In addition, changes were made to the location of the proposed asphalt plant and stockpiles to help reduce potential impacts.

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Arthur,Damon <Damon.Arthur@redding.com>
Sent: Monday, March 8, 2021 9:36 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Crystal Creek Aggregate

Hi Tara,

I see that the Crystal Creek Aggregate owners have a new proposal that is going through another environmental review.

I just want to make sure I understand the differences between what was initially proposed a couple years ago and the current proposal.

Could you tell me what is new and different in the most recent proposal?

Was the earlier environmental impact report completed?

Thank you,

Damon Arthur

Reporter

Record Searchlight |  USA TODAY
NETWORK

Mobile: 530.338.8834

damon.arthur@redding.com

www.redding.com

We, the undersigned property owners, do hereby strongly and respectfully protest the proposed Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001). Asphalt plants are major sources of cancer-causing toxic air pollutants including sulfur dioxide, arsenic, benzene, formaldehyde, cadmium, hexane, phenol, toluene, lead, mercury, volatile organic compounds, polycyclic aromatic hydrocarbons and very fine condensed particulates. These fumes are known to cause cancer, liver damage, central nervous system disorders, high blood pressure, sinus problems, coughing, wheezing, shortness of breath, severe irritation of the skin, headaches, dizziness and nausea. Even if an asphalt plant meets all state and federal air pollution standards, people living nearby are still exposed to toxic airborne substances. The proposed facility is in close proximity to Middle Creek, Rock Creek, Whiskeytown Lake, the Sacramento River, and Shasta Union Elementary School. We also strongly oppose the loss of our property value. Having lost our homes to the Carr Fire in 2018, we, as a community are rebuilding with the hope of a better future for the Keswick area. Studies on the adverse impacts on property values document losses of up to 56%. Other concerns in addition to water pollution, the loss of clean air and decreased property values are smell, noise and the danger of increased heavy equipment operating in our area. We, the undersigned, have personally signed this Petition and are owners of real property as well as residents, and business owners that will be affected by the proposed project.

Name

Address

GRANT ^{Smyth} Grant Smith 16010 North St - Keswick Ca
 Diego P. Ortega D.P. Ortega 11052 Iron Mountain Rd.
 Kurt Schuhmeier Kurt Schuhmeier 11052 IRON Mt. RD.
 Nydia Schuhmeier Nydia Schuhmeier 11052 Iron Mt. Rd. Redding
 Cindy McLaughlin Cindy McLaughlin 1114 1/2 Starvation Flat
 Franklin McLaughlin Franklin McLaughlin 1114 1/2 Starvation Flat
 Wayne McLaughlin Wayne McLaughlin 1114 Starvation Flat Rd
 STEA VERMILION McLAUGHLIN Stea Vermilion McLaughlin 1114 STARVATION FLAT
 Tyler McLaughlin Tyler McLaughlin 1114 1/2 Starvation Flat Rd.
 Pat Root Pat Root 16117 NORTH ST
 Loretta J. Root Loretta J. Root 16117 North St Redding CA
 RALPH BENTRIM R. BENTRIM 1588 TRUMAN ST. 96001
 RYAN BENTRIM Ryan Bentrin 8750 SWASEY DR REDDING CA 96001

More will follow!!

RECEIVED

MAR 09 2021

COUNTY OF SHASTA
 PERMIT COUNTING

We, the undersigned property owners, do hereby strongly and respectfully protest the proposed Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001). Asphalt plants are major sources of cancer-causing toxic air pollutants including sulfur dioxide, arsenic, benzene, formaldehyde, cadmium, hexane, phenol, toluene, lead, mercury, volatile organic compounds, polycyclic aromatic hydrocarbons and very fine condensed particulates. These fumes are known to cause cancer, liver damage, central nervous system disorders, high blood pressure, sinus problems, coughing, wheezing, shortness of breath, severe irritation of the skin, headaches, dizziness and nausea. Even if an asphalt plant meets all state and federal air pollution standards, people living nearby are still exposed to toxic airborne substances. The proposed facility is in close proximity to Middle Creek, Rock Creek, Whiskeytown Lake, the Sacramento River, and Shasta Union Elementary School. We also strongly oppose the loss of our property value. Having lost our homes to the Carr Fire in 2018, we, as a community are rebuilding with the hope of a better future for the Keswick area. Studies on the adverse impacts on property values document losses of up to 56%. Other concerns in addition to water pollution, the loss of clean air and decreased property values are smell, noise and the danger of increased heavy equipment operating in our area. We, the undersigned, have personally signed this Petition and are owners of real property as well as residents, and business owners that will be affected by the proposed project.

Name

Address

Peggie R. Linville
PEGGIE R. LINVILLE

204-100-009-000
15962 Highland Ct. Redding, 96001

RECEIVED

MAR 09 2021

COUNTY OF SHASTA
PERMIT COUNTER

Petition Opposing Crystal Creek Aggregate Expansion Project

We, the undersigned property owners, local residents and businesses, do hereby strongly and respectfully protest the proposed Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP19-0007) and Reclamation Plan Amendment (PR 19-0001). Asphalt plants are major sources of cancer-causing toxic air pollutants including sulfur dioxide, arsenic, benzene, formaldehyde, cadmium, hexane, phenol, toluene, lead, mercury, volatile organic compounds and very fine condensed particulates. These fumes are known to cause cancer, liver damage, central nervous system disorder, high blood pressure, sinus problems, coughing, wheezing, shortness of breath, severe irritation to the skin, headaches, dizziness and nausea. Even if an asphalt plant meets all state and federal air pollution standards, people living nearby are still exposed to toxic airborne substances. The proposed facility is in close proximity to Middle Creek, Rock Creek, Whiskeytown lake, the Sacramento River, and Shasta Union Elementary School. We also strongly oppose the loss of our property value. Having lost our homes to the Carr Fire in 2018, we, as a community are rebuilding with the hope of a better future to the Keswick area. Studies on the adverse impact on the property values document losses of up to 56%. Other concerns in addition to water pollution, the loss of clean air and decrease property values are smell, noise and the danger of increased heavy equipment operating in our area. We, the undersigned, have personally signed the Petition and are owners of real property as well as residents, and business owners that will be affected by the proposed project.

Name	Address
Edward McGowan	2133 DREAM ST., REDDING, CA 96001
Catherine McAnisim	2133 DREAM ST. Redding, CA 96001
Renee LeVelle	2158 Dream St Redding CA 96001
Michael McAnisim	2133 Dream St. Redding CA 96001
Michael McAnisim	2133 Dream St. Redding CA 96001

Mail or Email to:
Ms. Tara Petti, Associate Planner
Shasta County Department of Resource Management, Planning Division
1855 Placer Street, Suite 103, Redding, CA 96001
Email: tpetti@co.shasta.ca.us

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Name

Address

Cynthia L. Nichols

2319 Cliff Dr 96001

Johnny J. Nichols

2319 Clippie 96001

We are opposed to this development for many reasons. We hope it will be built some other location if it is ever built at all. It is an environmental offense on so many levels.

Mail or Email to:

Ms. Tara Petti, Associate Planner

Shasta County Department of Resource Management, Planning Division

1855 Placer Street, Suite 103, Redding, CA 96001

Email: tpetti@co.shasta.ca.us

RECEIVED
SHASTA COUNTY

MAR 17 2021

DEPT OF RESOURCE MGMT
PLANNING DIVISION

We, the undersigned, do hereby strongly and respectfully protest the proposed Crystal Creek Aggregate Expansion Project Use Permit Amendment (UP 19-007) and Reclamation Plan Amendment (RP 19-0001). Asphalt plants are major sources of cancer-causing toxic pollutants including sulfur dioxide, arsenic, benzene, formaldehyde, cadmium, hexane, phenol, toluene, lead, mercury, volatile organic compounds, polycyclic aromatic hydrocarbons and very condensed particulates. These fumes are known to cause cancer, liver damage, central nervous system disorders, high blood pressure, sinus problems, coughing, wheezing, shortness of breath, severe irritation of the skin, headaches, dizziness and nausea.

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Name

Address

Krislen Brunton	15308 Bandana Mine Rd.
Virgil Redden	11323 Mulctown Rd.
Reid Dan	15990 Rock Creek Rd
Michael Duth	15025 Miners Gulch Rd
ERIN BROWN	15270 WHISPERING PINES DR.
Michael Lute	15280 WHISPERING PINES DR.
Richard Jones	11293 Goldsprink Sp. - Shasta
Alvaro Fernandez	15888 Rock Creek Rd 96001
William Kuntz	11401 Hidden Forest TR 96001
Troy Sands	15925 Lower Springs Rd.
Cathy Venoda	15459 Rock Creek Rd. Shasta
Greg Lambert	15300 Rock Cr Rd - Shasta
Shelby Thorson	10559 Second St Shasta 96087
Carle De Duart	15385 Maverick Dr Shasta 96087

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Name	Address
- Courtney Brown	11409 Benson Dr, Shasta CA 96087
- Ian Bennett	151611 Rock Crk Shasta CA 96087
- Rick Harrison Smith	10630 Shurtleff Alley Shasta CA 96087
- Larry Staup	15211 Rock creek Shasta Ca. 96087
- James Weaver	10543 Second St. Shasta, CA 96087
- Jane Keinan	11254 Benson Drive, Shasta, CA 96087
- Sandra Valenzuela	11536 center st Redding Ca 96001
- Michael Horner	11536 Center St. Redding CA 96001
- Elizabeth Harrison-Smith	10630 Shurtleff Alley Shasta CA 96087
- Jodi Fogolin	15300 Ruggles Rd Shasta CA 96001
- Ann Reed	15022 Miners Blvd Rd Shasta 96087
- Letty Brown	15329 Bandana Mine Road Shasta 96087
- Diane Hicks	16240 VALPARAISO Way Redding 96001
- Frances Beard	15287 Walker Terrace
	Shasta CA 96087

Name

Address

- Owen Brown 15329 Bandana Mine Rd Shasta
- Kari Brown 15329 Bandana Mine Rd Shasta
- Susan Galen 10747 French Alley Shasta CA 96087
- DIANNE Fox 15300 Stone Terrace Shasta 96087
- Cheryl K. Smith 15473 Shadow Mountain Lane Shasta 96087
- Matthew T. Reed 16017 N. H. St. Redding, CA 96001
- Sue Taylor 10505 Iron Mt. Rd, 96001
- Susan Miller 15795 Middle Crk Rd, 96001
- Joe Miller " " " "
- MAC MacDonald 15380 Puggles
- Alicia McVerlin 15166 Rock Creek Rd, Shasta CA 96087
- Susan Nickell (6) (4) 9810 Swasey Drive, Redding CA 96001
- Edith Geist 10708 Trinity Alley Shasta 96087
- John Reeves 15734 Hwy 299 west Shasta 96087
- Sally O'Connor 10141 Sandy Lane Redding CA 96001
- Philip Chadwick 11044 Wingfield Shasta 96087
- Kendell Swanson 11055 Wingfield Shasta 96087
- Amy Enderske 15639 Rock Creek Rd Redding, CA 96001

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Print
Name

Signature

Address

Sandra Lynn Trujillo 3259 Harlan Dr. Redding, Ca 96003
~~Sandra Lynn Trujillo~~

Gay A Geoble
~~Gay A Geoble~~ 3234 Harlan Dr

Stacy Burgess ~~Stacy Burgess~~ 3220 Harlan Dr Redg 96003

Teri Donnicci ~~Teri Donnicci~~ 3206 Harlan Dr. Redg 96003

Penelope A. Harris ~~Penelope A. Harris~~ 3188 Harlan Dr. 96003

David Hepburn ~~David Hepburn~~ 3211 Harlan Dr 96003

Rhonda Arnold ~~Rhonda Arnold~~ 3227 Harlan Dr. 96003

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Name	Signature	Address
DENNIS SWEENEY	<i>Dennis Sweeney</i>	3275 HARLAN DR. REDDING 96003
PATRICIA PAYNE	<i>Patricia Payne</i>	3276 Harlan Dr. Redding 96003
Jogane Bollinger	<i>Joanne Bollinger</i>	3262 Harlan Dr. Redding, "
Gary Lyon	<i>GARY LYON</i>	3315 HARLAN DR. EDG, CA 96003
JOHN STREUBER	<i>John Streuber</i>	3304 Harlan Dr. Redding, CA 96003
Barbara Streuber	<i>Barbara Streuber</i>	3304 Harlan Dr. Redg 96003
Kathy Trueblood	<i>Kathy Trueblood</i>	3302 Harlan Dr. Edg. 96003
Bobbie Gray	<i>Bobbie Gray</i>	3331 Harlan Dr.
Michael Trueblood	<i>Michael Trueblood</i>	3312 Harlan Dr
Sue Ratliff	<i>SUE RATLIFF</i>	3290 Harlan Dr Redding, CA 96003

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Name

Address

Edward Anderson Edward Anderson 16030 Laurie Ann
 Judy McKay Cifuentes Judy McKay 16084 Laurie Ann
 Mark Thompson Mark Thompson 16282 Laurie Ann
 Amanda Thompson Amanda Thompson 16282 Laurie Ann Lane
 Chris Hunter Chris Hunter 16265 Laurie Ann Lane
 Jennifer Mansfield Jennifer Mansfield 16265 Laurie Ann Lane
 Giselle Mansfield-Hunter Giselle Hunter 16265 Laurie Ann Lane
 DAVID SWEETHOFF David Sweethoff 16367 LAURIE ANN LN
 Stephanie Wedo Stephanie Wedo 16279 Laurie Ann Lane
 Travis Meadows Travis Meadows 16279 Laurie Ann Lane
 Dawn Dawn
 Vicki Burlison Vicki Burlison LAURIE ANN LN
 KATHLYN KIRKLAND KATHLYN KIRKLAND LAURIE ANN LANE.

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Name

Address

Richard M. Street

15790 Highland Circle Redding, CA

Horizontal lines for additional signatures and addresses.

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Name

Address

<i>Cloria McMaster</i>	<i>1870 Wisconsin Ave</i>
<i>Ann Hickens</i>	<i>1747 Schend St</i>
<i>Sharon Salpa</i>	<i>1162 Edwin Rd.</i>
<i>Linda D. Wright</i>	<i>3857 W. Anderson Dr, Cottonwood</i>
<i>Paul AHERN</i>	<i>3158 Wilshire Dr</i>
<i>[Signature]</i>	<i>Redding CA 96002</i>
<i>[Signature]</i>	<i>996 STUONA CT, REDDING, CA 96003</i>
<i>Gary Schalk</i>	<i>2510 Cumberland Rdg 96001</i>
<i>Joseph Maccinti</i>	<i>3250 Panorama Dr. Redding 96003</i>
<i>Matt McLeilly</i>	<i>3250 Panorama Dr. Redding, 96003</i>
<i>Pat Martin</i>	<i>2145 Adirondack Dr Rdg 96001</i>
<i>Sharon Lerner</i>	<i>4132 Villa Dr 96001</i>

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Name	Address
Pat Bunnell	11361 Taunstaaf Lane, Rdg.
Test Goldsmith	11370 Taunstaaf Ln, Rdg.
Doreen Goldsmith	11370 Taunstaaf Ln, Rdg.
Donna Dowling	11327 Taunstaaf Ln, Rdg
Jim Dowling	11327 Taunstaaf Ln, Rdg
Sally Wickner	9025 Placer Rd. Rdg.
Stella Prudhomme	2557 Lake Redding Dr.
Stefan	2557 Lake Redding Dr., Rdg 96003
Dore Kettner	PO Box 265, Shasta CA 96087
MARNELL	PO Box 265 Shasta CA ^{Rock Creek Road}
Haborah Bayley	16020 High St. Redding, CA 96001
PJ Nelson	10810 ROGNAR PALO CEDRO, CA 96008
Michael Schlosser	11358 Iron Mtn Rd, Redding, ca
Grace Nugas	11520 Weiland St Redding ca

Name

Address

' JHALOS NUGAS 11520 WATLAND ST
Christine Conte Po Box 54 Shasta ca
Phillip on 11489 North St

' Marc Fernandez 15885 Rock Creek Rd.

' ERIC Bunnell 11361 TANSTAEK LN.

' Bryan McCall 4155 Fraime St Redding

' Peter Seiler 4610 Mira Vista Ct Redding 96001

' Jeannine Gillan 4135 Boston Ave Redding 96001

' David J. Vaughn 4135 Boston Ave Redding 96001

' Kenneth Niles 15740 Rock-Creek Rd. Redding 96001

' GEORGE NILES M I U

' Stephanie Sattler 11447 Market St, Iron MTN Rd 96001

We, the undersigned property owners, do hereby strongly and respectfully protest the proposed Crystal Creek Aggregate Expansion Project; Use Permit Amendment (UP 19-0007) and Reclamation Plan Amendment (RP 19-0001). Asphalt plants are major sources of cancer-causing toxic air pollutants including sulfur dioxide, arsenic, benzene, formaldehyde, cadmium, hexane, phenol, toluene, lead, mercury, volatile organic compounds, polycyclic aromatic hydrocarbons and very fine condensed particulates. These fumes are known to cause cancer, liver damage, central nervous system disorders, high blood pressure, sinus problems, coughing, wheezing, shortness of breath, severe irritation of the skin, headaches, dizziness and nausea. Even if an asphalt plant meets all state and federal air pollution standards, people living nearby are still exposed to toxic airborne substances. The proposed facility is in close proximity to Middle Creek, Rock Creek, Whiskeytown Lake, the Sacramento River, and Shasta Union Elementary School. We also strongly oppose the loss of our property value. Having lost our homes to the Carr Fire in 2018, we, as a community are rebuilding with the hope of a better future for the Keswick area. Studies on the adverse impacts on property values document losses of up to 56%. Other concerns in addition to water pollution, the loss of clean air and decreased property values are smell, noise and the danger of increased heavy equipment operating in our area. We, the undersigned, have personally signed this Petition and are owners of real property as well as residents, and business owners that will be affected by the proposed project.

Name

Address

Wendy Welsh	3265 Marlene Ave Redding 96002
Harold Ray	4083 Alta Mesa 96002
Orin Payne	4083 Alta Mesa Dr. 96002
Laura Christensen	12162 Kawliga Lane, 96008
John Welsh	3265 Marlene Ave Redding 96002
Robert W. Christensen	12162 Kawliga Ln., Bella Vista, CA 96008
Frank Lou Schreiber	2733 Hawk Ave, Redding CA 96002
Don Pollett	2733 Hawk Ave, Redding CA 96002
Sarah Ray	11355 Menlo way, Redding CA, 96003

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Name

Address

Mark D Twitchell	339 River Park, Rdy 96003
Marie Twitchell	339 River Park Dr. Rdy 96003
Jenny R. Taldi	3891 Colby Tract Rdy 96007
Denis N. Benoit	PO Box 5784 Shasta Lake 96089

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Name	Address
✓ Joe Corey	15817 Rock Creek Rd
✓ Anastasia Corey	15817 Rock Creek Rd
✓ Kate Jewett	15789 Rock Creek Rd.
✓ Miles Ingalls	11333 Millie St.
✓ Nels Klaseen	2295 Oak Ridge Dr
✓ Douglas Holt	16471 Plateau Cir
✓ CHAIN GANG BIKE SHOP	1540 Division St.
✓ ERIC GELST	10708 TRINITY ALY
✓ Jeff Owens	5297 E Bonnyview
✓ Andy Friszen	15510 Red Bluff Rd #1
✓ Shawna LaBella	4638 Trinity St, Shasta Lake
✓ JOE DODD	3535 SCENIC DR 96001
✓ DAVID DODD	1887 O'CONNOR
✓ Mark Ingalls	11333 Millie St
✓ John Hosoma	21445 Chipmunk

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Even if an asphalt plant meets all state and federal air pollution standards, people living in the vicinity are still exposed to toxic airborne substances. The proposed facility at Crystal Creek Aggregate is in close proximity to Middle Creek, Rock Creek, Whiskeytown Lake, and the Sacramento River. The communities of Keswick and Old Shasta are nearby. Shasta Union Elementary School is less than a mile and a half away. The pollution generated by the projected operation of the plant, 24 hours a day from Sunday evening until Friday afternoon, will impact those living or recreating in the immediate area. The noise, smell, and danger posed by increased truck traffic hauling asphalt through Redding will affect a far greater number of people. We, the undersigned, have personally signed this Petition, and are concerned residents and business owners that will be affected by the proposed project or are concerned about the impact on the environment, and strongly object to its approval.

Name Print/Sign

Address

Lelly Delaney 15745 Ranchland Drive Redding CA

Kristi Hanson 4651 Lookout Ct. Redding, CA

~~Bony Harkworth~~
GARY HARKWORTH 15262 Rock Cr. Rd.

Paul Wade's WADE 1991 Holler Rdg CA

Joy Wade Joy Newcom 3702 FUJIYAMA, Rd Redding

VIRGINIA A KRINKEL Virginia A Krinkel 9872 Swasey Dr Redding 96001

Cindy & Rusty Bishop 2210 O'Conner Ave Redding CA 96001

Ayla + Wesley Tucker 100893 Granite Dr. Shasta CA 96087

Alan & Peggy Foster 15357 Park Creek Rd Shasta, CA 96087

Benancio Rivera 3310 Auburn Dr Shasta 96001

Name Print/Sign

Address

Jared Smith 4455 Egret Ct 96002

Helen J. Woolley 4265 Hazelwood Ct 96001

David M Yorton 2130 Adirondack Dr 96001

MARY Slatts 15330 LA PALOMA Wy, RD 6

SANDRA Renier Sandra Renier 3182 Riesling Path 96001

UGO MELLONI 3700 McHale Way 96001

JACKLYN CASTELLANOS 3915 ORO ST

Theresa Hugo 1544 Orange Ave Redd 96001

SUSAN HABERT Skelvert 2074 Quarry Way 96001

Josma GREEN 4969 TRAVEE Lane, Redding, CA 96001

Wendi Zampino 24 Hoya Vici Ct Alamo CA

Carol Kramer 700-700 Richmond Rd, Susanville 96130

John Egolf 863 Sunriver Ln Redding CA 96001

Sara Fletcher 15798 Scruff dr Reddy 96001

LISA CREPS 16550 CELTIC CT REDDING CA 96001

Kathy Seigle 4623 Oak Glen Dr. Redding, CA 96001

Patricia Jewett 2291 Athens Ave. Redding Patricia Jewett

Kathy Seigle

Name

Address

Todd	4719 OIKNEY, SLC
PAUL NAUMAN	8454 CROWN WAY 96001
L R Hudson	4719 OIKNEY PL. SLC 96019

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Name	Address
By <i>[Signature]</i>	6950 Riverland Dr. #17
Lony <i>[Signature]</i>	13761 Kirkelie LN Shasta lake
Steve Parker	1933 Regent Ave.
Austin Murphy	16893 Cape cod Dr.
Chris Beaman	2965 Eastway # F Redding CA 96002
Eliseo Ramirez	16917 Cape cod DR 96003
Klint <i>[Signature]</i>	20833 STEVEN CREEK LN 96003
Colin Price	15898 Lower Spring's Road 96001
Darwin Bergstrom	3760 Brian Ct. Redding CA 96001

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Name

Address

Colleen Thompson	71 River Rock Rd. Lewiston, CA
Juli Cremeans	2275 Gold St. Rdg. CA 96001 96052
Kimberly West	16074 Alhambra Ln. 96001
Michele Tyson	Po Box 128 Shasta. Ca. 96087
Rebekah Page	621 Saginaw st apt 10 Redding CA 96002
Tracee Mallamo Evanhoe	578 Mill Valley Pkwy. Redding CA 96003
Roxanne Beasley	2018 Everest Dr. Rdg, CA 96001
Justin Tuggle	2718 Blue Bell Dr. Redding, CA 96001
Renee Sumption	2180 Adirondack Dr. Redding CA 96001
Christine Silveira-Turpen	8958 Placer Rd. Redding CA 96001
Terri Sherman	8224 Secluded Valley Dr Redding CA 96001
Karen Burton	10364 White Star Dr., Redding, CA
Suzanne Adams	9143 Simmons Rd Redding CA 96001 96001
Danna Harvey	8049 Macie Cr. Redding, CA 96001
Kristin Henry	15236 Diggins Way Redding, CA 96001
Garnen McIntyre	4543 Nantucket Dr Redding, CA 96001

Name

Address

Ron Johnson

1021 Peregrine Way, Redding,

96003

Tracee King

1407 Jen Way Biggs

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Name

Address

Carlye Avey	11395 Bandana Trail Shasta, CA
Cody Albertson	11395 Bandana Trail Shasta, CA
Brian Christopher	4390 Rising Mist Circle CA
Julie Case	Redding, CA 96001
Kim Caton	3530 First Cabin Ct. Redding 96003
JEFFREY BISETTI	655 HILLTOP DR. REDDING, CA 96003
[Signature]	1525 Wisconsin Ave Redding 96001
[Signature] Elizabeth Van Ness - McKinney	2395 Dartmouth Dr Redj 96001
[Signature]	PO Box 430 Cottonwood, CA 96002
[Signature]	8476 ROCKLIN WAY, REDDING, CA 96001
Bob Jewett	15789 Rock Creek Rd Shasta CA 96087

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Name

Address

Sarah Bundy	2820 Donner Ct Redding 96001
Rachel Boongarder	7575 Camino Del Encina Dr Redding 96001
Jeff Hayman	4149 Boston Ave 96001
Laura Gowen	1045 Redbud Dr. 96001
Robert Lowden	1045 Redbud Dr. 96001
Katie Gabriele	503 River Oaks Redding 96001
Michael Riley	7685 Happy Valley Rd Redding CA 96007
Gary Wilson	7098 meadow waste Redding
Steve Brumbaugh	17940 Shawn Dr Redding 96007
Kara Nordstrom	250 Overhill Dr unit 1 Redding CA 96001
Ken Cavatun	16510 Happy Valley Trail Cottonwood
Sylvia Ueberke	16510 Happy Valley Trl Cottonwood CA
Tim Oppert	8816 Landmark Circle
Stephanie Rossini	4642 Kenmore Ct. Redding

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Name

Address

Michelle Lewis	neway Power Line Road Rdg CA 96001
Joseph Lewis	16604 PowerLine Road Rdg CA
Cynthia L. Graham	15417 Rock Creek Rd 96001
Connie Winter	2187 DARTMOUTH DR. 96009
Chris Fazzari	3890 Wasatch Dr. Redding 96001
Pat Graham	15417 ROCKCREEK RD. 96007
Jessie	CHESTNUT ST, REDDING, 96001
John	17026 Laurel Ln Anderson Ca 96007
Gerome Blankinship	4404 Trade Ln. Redding CA 96001
Halle A	11421 Market St. Redding CA 96001
Patrick Price	3648 ALUS ST. Shasta Lake 96013
Craig W-Woods	2734 Dartmouth Dr. Redding CA 96001
Mark	2610 Howard Dr. Redding CA 96001
Michelle	4281 Frances Dr Redding CA

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Name	Address
Eileen P. Rohmer	16284 B. Southview Ct. Redg
Liker Gillis	830 Chamberlain Place
Tareed Mahmood	4624 Oak Glen Dr Reddy, CA 96001
Keira Hughes	4684 Oak Glen Dr Redding CA 96001
Liz Kohn	10177 Tilton Mine Rd. Redding, CA 96001
Stephanie Weisbs	116279 Laurie Ann Ln Redg CA
Aaron McIntyre	4543 Newtucket Dr. Redding CA, 96001
CHAD NELSON	14950 Tollhouse Rd SHASTA CA 96087
Lawrence Licker	3520 Elizabeth Way, Redg, CA
Donna Davis	2910 Shadow Creek Ln., Redding 96001
Jesse Eberle	10463 Lynn Hill Rd Redding, CA 96003
Blindauer	11099 Barbara Rd Redg 96003
Noel Welch	1603 JAY ST REDDING CA
Joni S. Starnud	3617 Oro St Redg CA 96001

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Name

Address

ROY BERLINGHOFF	16290 LAURIE ANN LN.
LEANNE BERLINGHOFF	16290 Laurie Ann Ln.
Richard Hardie	15812 Rock Creek Rd
Kathy Williams	10921 Stacie Way
Ellen Sweeney	3275 Harlan Dr.
STEPHEN WILLIAMS	10921 STACIE WAY
Bryan Fraser	10913 stacie way
TREVOR TOWNE	16177 LAURIE ANN LANE
Emily C White	15812 Rock Creek Rd
Jeff Ray	16337 Plateau Circle
JOHN KIMPLE	15455 MIDDLETOWN PK. DR. REDDING
Barbara Fnochian	15455 Middletown Pk Dr Redding
Michael Schwald	1776 Magnolia Ave Redg
Beatrice Wynant	" "

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Name

Address

Todd Royse	2652 Eel Drive, Rdy 96002
Jade Hisey	249 Boulder Creek Dr Redding 96003
Clifton Lee Bowman	2324 North St Redding CA, 96001
Bridget Leslie	PoBox 369 IGO 96047
Dreda Royse	2652 Eel Dr. Rdy CA 96002
David Craig	1314 Olive Ave Redding, CA. 96001
Loran Isheim	4492 MOYVANE DR.
Bradford Masters	367 Franciscan Trl R06 96003

Kate

*please call back

regarding how many signatures is needed to stop the project

RECEIVED

MAR 19 2021


COUNTY OF SHASTA
PERMIT COUNTER

FW: Asphalt Plant Expansion - Can we be informed?

Tara Petti <tpetti@co.shasta.ca.us>

Mon 3/22/2021 11:23 AM

To: Bruce Grove <bgrove@shn-engr.com>

 2 attachments (7 MB)

PXL_20210322_173253351.jpg; PXL_20210322_173247364.jpg;

Tara Petti

Associate Planner
Shasta County Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA. 96001
Department Main Line (530)225-5532

From: Jacklyn Castellanos
Sent: Monday, March 22, 2021 10:34 AM
To: Tara Petti <tpetti@co.shasta.ca.us>
Subject: Asphalt Plant Expansion - Can we be informed?

Hello,

Attached are concerned citizens of Shasta County that would like more information regarding the expansion.

Thank you,

Jacklyn

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Name Print / Sign

Address

- Samuel Wiseman / [Signature] 1981 Dellwood Dr.
- Gara Harvey/Kira Kenny 2205 Crestview Ave 96001
- Teri Zarriello/Jeri Zarriello 3106 Loubert Ln. Rdy 96002
- Paris Clifford/Paris Clifford 6717 Park Ridge Dr, Anderson 96007
- Nellie Lira Giammona/Willedd 811 Rincon Way Redding 96008
- Robert Dean Pryor / [Signature] 2268 Sageway Dr. Redding CA 96003
- Shari Maravio / [Signature] 6433 Clovermarie Lane, Anderson CA 96007
- Sherry Bova / [Signature] 4317 Meade St. Shasta Lake, CA 96019
- Jeff Waite/Jeff Waite 17645 Brehaven Ln Anderson CA 96007
- Sara Bristow / [Signature] 2052 Penn dr. Redding CA 96002
- John Moore / [Signature] 2052 PENN DR REDDING CA 96002

Name Print/Sign

Address

Eddie Andrews	[Signature]	3915 Oro St. Redding CA 96001
Craig Martin	[Signature]	3744 Rushmore Dr. Redding 96001
Jesse [Name]	[Signature]	3915 Oro St. Redding CA 96001
Garrett Claycamp	[Signature]	8045 Secluded Valley Dr. Redding CA 96001
Duane Sherman	[Signature]	4110 Bradley Dr. Redding CA 96003
Josiah Sherman	[Signature]	3902 MEADOW OAK WAY REDDING CA 96002
Holly Stark	[Signature]	22171 Nubbin Ln. Palo Cedro CA 96073
Adriana Zapata	[Signature]	10129 Harley Leighton Rd Redding CA 96003

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COUNTY OF SHASTA
PERMIT COUNTER

Name

Address

Deja Smith	896 Congaree Lane Redding CA 96001
Jim [Signature]	3589 Silverwood, CA Redding, CA 96002
Jose Palos	792 Country Oak Dr. Redding, CA 96003
Scott Burnett	1360 Bamboosy Ct.; Redding, CA 96001
Marcela Palos	792 Country Oak Dr., Redding 96003
Keith [Signature]	2346 Placer St. Redding CA 96001
Zack Caples	6181 Brassie way CA 96003
Haley Endraske	2211 College View Dr Redding, CA 96003
Mark Endraske [Signature]	15639 Rock Creek Rd Redding, CA 96001
Brian Johnson	3589 Silverwood St. Redding, CA 96002

Asphalt Plant Petition

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Name

Address

Aimee Patner	1070 Continental St. Redding 96001
Marcus Garibay	1116 Olive Ave
Jill Kane	3620 Altura Ave Redding CA 96001
MARCO MANCOSA	10184 GRAND FORKS COURT 96001
Michele Malaskey	15786 Rockcreek Rd 96001
Keri Grade	4629 Creekside St Redding 96001
Aneke Stokes	875 Lakewood Dr. Redding 96001
Ginko Schabrum	2711 1/2 Reservoir Lane 96002
Ely Habelau	2711 1/2 Reservoir Lane
PATRICIA KISH	5371 STONETHROW CT 96003
Doris Mancosa	10184 GRAND FORKS CT.
MOLLY MANCOSA	10184 GRAND FORKS CT 96001
JOHN MANCOSA	10184 GRAND FORKS CT 96001
SYDNEY MANCOSA	10184 GRAND FORKS CT 96001

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Name

Address

-
- ✓ KIKA MANASSA 10184 GRAMA FARMS LT 96001
 - ✓ Pat Pusateri 0458 Pleacer St 96001
 - ✓ Joyce Lively 10100 Sandy Lane - Redding 96001
 - ✓ Roberto Kersden 10100 Sandy Lane 96001
 - ✓ Elizabeth Mustur 1525 Magnolia ave., Redding CA 96001
 - ✓ Tyla Shusta 1525 Magnolia Ave, Redding CA 96001
 - ✓ Marcus Pereira 16149 Keswick Dam Rd 96001
 - ✓ Jim Milestone 3411 Showboat Ct. Redding CA 96003
 - ✓ MARGARET L. RAMIREZ 11731 MILTON PARK LN Redding 96002
 - ✓ John Finley 11731 Milton Park Lane Redding
 - ✓ PATHY SCOTT ^{Cathy} 15161 DIBBINS WAY RD 96001
-
-
-

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Name	Address
✓ Ken McNeilly Ken McNeilly	Terrace Shasta 15273 Walker 15273 96087
BARRY DAWSON	15057 MINERS GULCH RD SHASTA 96087
✓ Paul & Fayler	P.O. Box 71, Shasta, CA 96087
✓ Cheryl Wall	10565 Long Mtn Rd, Redd. 96001
✓ JOHN BARBERA	15268 WALKER TER. SHASTA 96087
✓ JOAN BARBERA	15292 WHISKEYTOWN PINES SHASTA 96087
✓ Diane Hirst	15189 Wilderland Dr.
✓ Yojiro Sadohara	11870 charity way Redding
✓ Sheryl. Sadohara.	11870 charity way Redding
✓ JAMES BARBERA	15477 HWY 299W SHASTA 96087
✓ Adele Vasquez	15477 Highway 299W Shasta 96087
✓ R R	11042 Sugar Pine LN Shasta
✓ ROXANNE Geil	2744 LANNING AVE. Redd. CA 96001
✓ Don McDonald	15026 Rock Creek Rd Shasta 96087
✓ Terrie Hukill	10630 Red Bluff Rd. Shasta 96087

Name

Celeste Halcy

Address

2892 Fernwood St Redding Ca 9600

Lined writing area consisting of 20 horizontal lines.

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Address

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DEPT OF RESOURCE MGMT
PLANNING DIVISION

- Kathleen Ann Vill - *Kathleen Vill* 1951 Dellwood Dr. Redding
- Tara Mari Juan Mari 13489 Tierra Oaks Dr. Redding 96002
- Terra Villa *Terra Vill* 4599 Eel Court Redding, CA
- *Jeremias* 3902 Hotlum Rd Redding CA
- Chelsea Hendershot 4545 Cerro Ln Redding CA 96001
- *Janan C. Kearns Light*
- Janan C. Kearns Light 2332 Wilson Ave # F Redding 96002
- *Rita Gail Zapala* 9406 Arroyo Vista Dr Millville
- *Jermanid Zapala* 9406 ARROYO VISTA DR. MILLVILLE
- *Agustin Villa* 4599 Eel Ct. Redding CA. 96002
- *STEVEN WILLIAMS Stephen Williams* 10921 STACE WAY Redding 96001

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- | | |
|-------------------------------|--|
| Caris Friesen Caris | Redding, CA 96001
2304 Dream st. |
| Laura Bryce | 8544 Pacer Rd. 96001 |
| Shawna Spotten SS | 2401 Shady Ln. #3
Anderson, CA 96007 |
| Janelle Pearson Janelle | 1755 Mesa St.
Redding, CA 96001 |
| Cheryl Pearson Cheryl Pearson | 1755 McCAST
Rdy, CA 96001 |
| Pablo Mancasola | 10184 Grand Forks Ct.
96001 |
| Jeana Brady/Jeana Brady | 11352 Benson Dr. Shasta 96087 |
| Carlos Mancasola /C/M | 10184 Grand Forks Ct. 96001 |
| Cassandra Minihan C Minihan | 15086 Vista Knolls Dr 96001 |
| MIKE MINIHAN M Minihan | 15086 VISTA KNOWS DR
REDDING
96001 |

Name Print/Sign

Address

- ✓ ~~Wm Jim~~
- ✓ Diana Turner 1064 Riviera Dr. Redding, 96001
- ✓ ANTOINETTE PERKINS Antoinette Perkins 4081 Remington Dr. Rdg. 96001
- ✓ Cynthia Cruz 91 5th St, Lincoln CA 95408
- ✓ Ethan Cuiver 1875 Wisconsin ave
- ✓ Coda Bowen 1076 Montclair Dr
- ✓ Morgan Dobbs 16665 Powerline Rd.
- ✓ ~~KENNETH BRANSON OLSSON~~
✓ Kenneth Branson 4325 EDEN RIDGE CT. REDDING CA 96001
- ✓ James Doss 16665 Powerline Rd Redding 96001
- ✓ Carrie Dyer "
- ✓ Lynne Pearson 15215 Brunswick Dr Shasta 96087
- ✓ Phil PEARSON 15215 BRUNSWICK DR SHASTA 96087
- ✓ Phil Kueper 5784 Belmont
- ✓ Chris Adams 11396 BANDANA TR } Shasta
- ✓ Susan Adams 71396 Bandana Trail }
- ✓ Susan Grant 11490 Benson DR SHASTA 96087
- ✓ ~~J. K. Kram~~ 16050 Victoria Highland Dr. Red. #1
- ✓ Judy Smith 15135 Rock Creek Rd. Shasta CA
- ✓ Steven Newhouser 15459 Rock Creek Rd
- ✓ G. ROB MACRAE 16272 Keswick Via. W. Redding
- ✓ Leslie Macrae 16272 Keswick View Way
- ✓ Gannon Preisser 15439 Mockingbird
- ✓ Karen Preisser 15439 Mockingbird
- ✓ NEIL Buchholz 15581 Surprise Ln
- ✓ Alejandro Villa 4256 Baywood Dr
- ✓ AGUSTIN Villa 1951 DELWOOD DR

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Paul Lencum 3285 Eagle Pkwy. Rdg.
John Phillips 27203 Hwy 299 E Bella Vista CA
Sueley House 1610 Wisconsin Rdg, CA
Mado Andres Templado 11284 French Creek Rd
Bita McComas 3275 W. Bailey Dr. Anderson CA
Terrance P. Healey 1574 Oakdale Lane, Redding CA
Karen M. J. J. J. J. 226 Fungview Ct. Redding CA 96003
Jim Sloman 10651 Holt St., Shasta, Ca.
Norma R. Erickson 15510 Red Bluff Rd Sp. Shasta 96007
Mt Spack 10133 SANIYUN 96001


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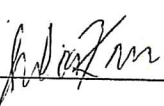
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
Address

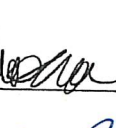
Joseph Bryans  505 Buckeye Terrace Apt C Redding CA 96003


Dylan Prows  797 El Cerrito Ave Redding, CA, 9600

Julia Kustina  706 Coronado Street Redding, CA, 96003

Kara Krueger  12560 Wornan Redding CA 96002

Emily Davis  1520 Cordova St. Anderson, CA. 96007

Carol J. Johnson /  19668 White Horse Place Cottonwood 96022


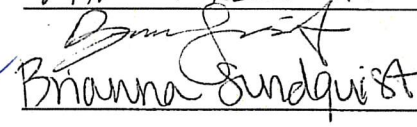
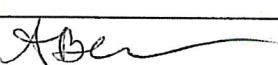

Jessica Ellington /  2702 Bonaset St Rdy 96002

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Address

Ryan Zuercher 3546 American Way Red 96003 
 Brianna Sundquist 2260 Athens Ave. Redding CA 
 Matthew Love 2840 Blue Bell Dr. Redding CA 96001
 Chariti Dugley " " "
 Andrée Blanchier 2053 Imelda St Redding, CA 96001 
 Cindy Curtis 901 N. Market St Reddy 96003
 Jeff Walsh  15798 Scruffy dr. Redding, CA 96001

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