

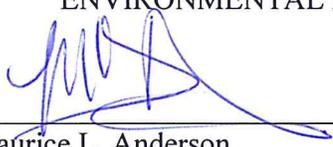
PRELIMINARY DETERMINATION

INITIAL STUDY #2018-001 for USE PERMIT AMENDMENT #2018-003 and RECLAMATION PLAN AMENDMENT #2018-001, TLT Enterprises, LLC

DETERMINATION:

On the basis of this Initial Study:

- 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 the mitigation measures described in the Initial Study have been made a part of the project. A NEGATIVE DECLARATION will be prepared.
- I find that the project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT will be required.


Maurice L. Anderson,
Environmental Review Officer

6-1-18
Date

Project Title:	Ward Lake Pit Amendment
Lead Agency Name and Address:	Lassen County, 707 Nevada Street, Susanville, CA 96130
Project Location:	The project is located in Litchfield, CA at 476250 Ward Lake Road, off Center Road (A-27) in Lassen County, approximately 13 miles east of Susanville, CA. A.P.N.: 109-100-59 (Old 109-100-40, 42, 44).
Proponent's Name and Address:	Perry Thompson TLT Enterprises LLC 24339 Highway 89 Burney, CA 96013
General Plan:	Extensive Agriculture; <i>Standish-Litchfield Area Plan</i>
Zoning:	U-C-2 (Upland Conservation/Resource Management District) and U-C-A-P (Upland Conservation Agricultural Preserve Combining District)

Project Description:

Proposal to amend mining operations at the Ward Lake Pit (CA mine ID #91-18-0008). If approved, the amendment would allow for 24-hour mining operations, Monday through Saturday (currently the use permit allows operations from 6:00 a.m. to 7:00 p.m., Monday through Saturday), extend the life of the mine from 2020 to 2030, allow annual site production in excess of the permitted 100,000 tons during declared emergencies, and increase the estimated number of truck trips from 10 per day and 55 per week to an average of 26 per day and maximum 150 per day during peak operations (not including employee vehicles). The submitted Use Permit Project Detail Supplement identifies a proposed noise level of 80-90 dB at a distance of 50 feet during daytime operations and proposed noise levels at the nearest property line of 70 dB during daytime operations and 65 dB during nighttime operations.

The Ward Lake Pit currently occupies 160 acres on a 442-acre parcel, owned by TLT Enterprises LLC. The surface mining operation is presently permitted for the mining of rock, crushing, screening, washing, material stockpiling, fuel storage; operation of a cement plant (12,000 cubic-yard annual limit) and asphalt plant; and the use of settling ponds, scales, an office and a truck shop. Grading, excavating, and blasting are prohibited onsite between January 1 and March 31 annually, except in a state of emergency, as declared by the local Emergency Services Director and/or the Board of Supervisors and/or the City of Susanville. The detonation of explosives is prohibited between the hours of 6:00 p.m. and 7:00 a.m. year-round. Current noise standards for the operation, as measured at the nearest affected residentially designated lands, require that daytime noise levels stay below 70 dBA and nighttime noise levels stay below 60 dBA (noise level standard varies with the cumulative number of minutes the noise lasts in any one-hour time period, see Lassen County Noise Element, Table III). The currently permitted activities and all associated conditions and restrictions will serve as the baseline for this Initial Study. All existing and anticipated ground disturbance associated with the mining operation was previously considered in an Environmental Document during the mines permitting process. No additional ground disturbance is proposed by this project.

Environmental Setting:

The project site is an active and permitted aggregate quarry, cement plant, and asphalt plant. It is located in Litchfield, CA at 476250 Ward Lake Road, off Center Road (A-27) in Lassen County, approximately 13 miles east of Susanville, CA. [A.P.N.: 109-100-59 (Old 109-40, 42, 44)] Much of the surrounding land use is related to agriculture; however, there are approximately 15 residences within a one-mile radius of the project site.

The site has been used as an active rock quarry since 1980, when Use Permit 79-80-44 was granted for a new mine with an asphalt batch plant. Condition #5 of this Use Permit, regarding the responsibilities of the operator for surfacing Ward Lake Road, was amended in 1985 by Use Permit 11-02-85. In 1994, Use Permit 94032 allowed for expansion of the mine and the addition of a concrete batch plant. The mine currently operates under Reclamation Plan 96056 and Use Permit 96056, approved in 1997, which rezoned land to allow for concrete production, allowed

for year round operations (with limited winter activities), and further expanded the mine to its current 160-acre boundary.

Current permitted operations at the site occur Monday –Saturday, from 6:00 a.m. to 7:00 p.m. Activities include excavating, grading, blasting, crushing, screening, washing, material stockpiling, wet suppression to prevent dust on roads and other surfaces, fueling of equipment and loading/unloading of belly dump semi-trailers; operation of a cement plant (12,000 cubic-yard annual limit) and asphalt plant; and the use of settling ponds, scales, an office and a truck shop. The existing mining operation is permitted for an annual production of up to 100,000 tons, 2,600,000 gross, and as many as 26 daily truck trips (an estimate, not an average) were anticipated and considered during the most recent environmental review and permitting process (1997 EIR). The site contains the following: numerous pieces of heavy equipment (e.g. loaders, excavators, concrete trucks, dump trucks, belly dumps, fuel haulers, water truck), crushers, sorters, fuel tanks, water tanks, a permitted well, a scale and scale house, an asphalt batch plant, a concrete batch plant, large stockpiles of sorted aggregate and stockpiled topsoil.

ACCESS: Access is by way of paved Ward Lake Road and paved Wells Drive, off of Center Road (A-27).

NOISE: A 1988 Community Noise Study identified an estimated day-night average noise level (Ldn) of 43.7 dBA at the intersection of CR 218 (Chappius Ln) at CR 211 (Lake Leavitt Rd), approximately 3.5 miles from the project site. According to the 1997 Environmental Impact Report, sound levels were taken during full operation of the ready mix [concrete] plant, which indicated that at full operation it generates noise levels of 50 dBA (measured at the nearest boundary of a property which could develop residentially). Current noise standards for the mining operation, as measured at the nearest affected residentially designated lands, are to be consistent with the standards outlined in the 1989 Noise Element, pg. 21 #19 and Table III. Table III shows that daytime noise levels must stay below 70 dBA and nighttime noise levels must stay below 60 dBA (noise level standard varies with the cumulative number of minutes the noise lasts in any one-hour time period). The mining operation is not currently permitted for nighttime operations.

VEGETATION: The project area consists mainly of shrub communities, including sagebrush, bitterbrush, and rabbitbrush. Approximately 120 acres of the project site, out of 160 permitted acres, has been cleared of vegetation.

WILDLIFE: The project area is considered important wintering range for deer and antelope, and also serves resident antelope and chuckar. Special status wildlife species that are known to occur, or have the potential to occur, within the project area include the golden eagle, northern harrier, Swainson's hawk, greater sage-grouse, burrowing owl, long-eared owl, short eared owl, loggerhead shrike, gray wolf, American badger, pallid bat, Townsend's big-eared bat, pygmy rabbit, and white-tailed jackrabbit.

HYDROLOGY: There are no existing streams or bodies of water within the boundaries of the project site, and the site is not within the 100-year floodplain. Several permitted settling ponds

are located at the north end of the project site, which drain into intermittent channels. At its closest point, the Eagle Lake Ditch is 375 feet west of the site. Although it does not hold water, it is federally listed as a historic site, but is located outside of the current operation boundary. Additionally, Ward Lake is located 0.5 miles southwest of the site, Willow Creek is 1 mile west of the site, and the Susan River 2 miles south of the site.

The mining operation currently has an approved Stormwater Pollution Prevention Plan (SWPPP). The operation practices standard soil erosion control protocols, including the use of berms, water bars or rolling dips; the use of rock check dams on roadway ditches; diverting run-on away from stockpile areas; installing stabilizers as necessary (silt fence, wattles, etc.); and directing runoff within the quarry to detention ponds.

Well water is used by the current operation for wet suppression of on-site dust. The applicant estimates 0-6 truckloads of water per day (4,000g/load) during daytime operations, with an average of 4-5 loads.

The project site is located within the Honey Lake Valley Groundwater Basin, which has been identified as a "low priority basin" by the Department of Water Resources, signifying that it is not currently at risk for overdraft. Within this basin, California's *Bulletin 118* estimates the total volume of water stored in the upper 100 feet of saturated basin-fill deposits and volcanic-rock aquifers to be 10 million acre-feet. Estimates of groundwater extraction for agricultural, municipal and industrial, and environmental wetland uses are 51,000, 15,000, and 3,800 acre-feet, respectively. Deep percolation from agricultural applied water is estimated to be 14,000 acre-feet.

As seen in the groundwater levels for monitored wells in the project area, found in the Department of Water Resources (DWR) Water Data Library, there is currently no trend or pattern indicating overdraft in the basin.

SOILS: According to the Natural Resources Conservation Services (NRCS) Web Soil Survey, soils at the project site are comprised of Devada-Rock outcrop association (2 to 50 percent slopes; nonirrigated land capability class 7e; no specified irrigated land capability classification), Orhood very stony sandy loam (5 to 15 percent slopes; nonirrigated land capability class 7s; no specified irrigated land capability classification), McConnel-Mottsville complex (2 to 9 percent slopes; nonirrigated land capability class 6e; irrigated land capability class 3e), and Fivesprings-Longcreek association (9 to 30 percent slopes; nonirrigated land capability class 7s; no specified irrigated land capability classification). These soils are listed by the NRCS as well drained to excessively drained, with no flooding or ponding concerns.

GEOLOGY: The following setting discussion is based on the text of the 1981 and 1997 Environmental Impact Reports for this mining operation.

The project site is located where the Modoc Plateau meets the Great Basin. This is an area of Cenozoic volcanic rock, the lower levels of which have been converted to gravels by shoreline action on ancient Lake Lahontan. The deposit to be mined is located just above the high water

line of Lake Lahontan in a large deposit of Pleistocene volcanic basalt. The deposit appears as ledge rock, the exposed edges of volcanic flow (Map #2-A, “Areal Geology”/Page 23).

Faults in the area trend in a northwesterly direction with a few faults shown to trend northeasterly. The fault shown very near the project site (within 0.25 miles) to the northeast (Map #2-C “1”, 1981 EIR, page 26) is Pre-Quaternary (older than two million years) or without recognized Quaternary displacement. There has not been any activity ascertained, and it is considered inactive. Another fault adjacent to this fault is a Quaternary fault displacement of less than two million years old, without any historic (past two hundred years) record of activity. The “Litchfield Fault” that follows County Road A-27 (Center Road, south of the project site), is also a Pre-Quaternary fault.

According to the California Geological Survey (CGS) *Earthquake Zones of Required Investigation Map*, there are no Alquist-Priolo Special Study Earthquake zones (active faults) within the project site. The nearest fault mapped by the CGS is approximately 7.8 miles to the southwest.

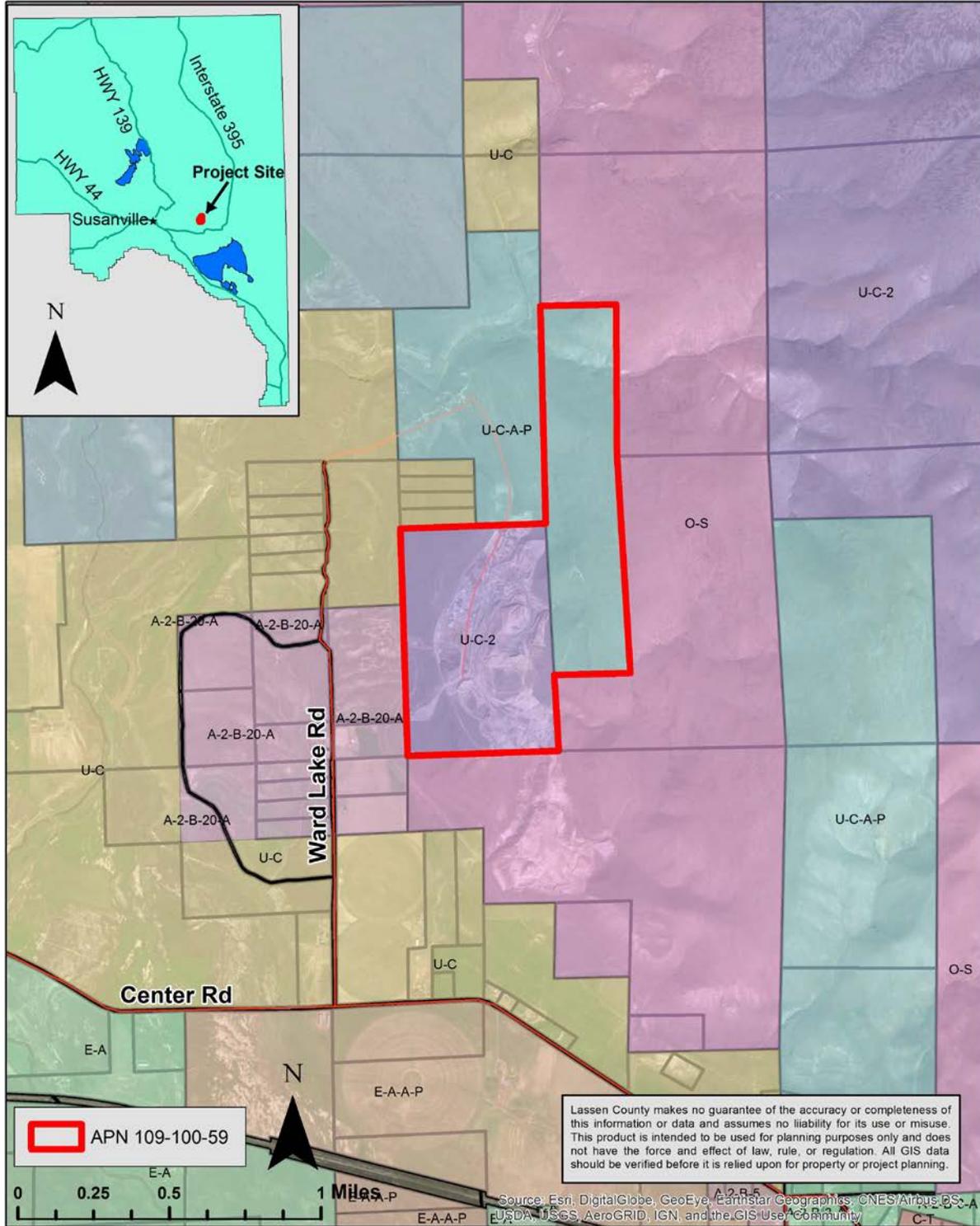
REGULATORY ENVIRONMENT: Lassen County is the lead agency for this project under the California Environmental Quality Act (CEQA) and the Surface Mining and Reclamation Act (SMARA), and has primary authority for project approval. In addition to Lassen County, the following agencies may have permitting authority over the project or portions thereof:

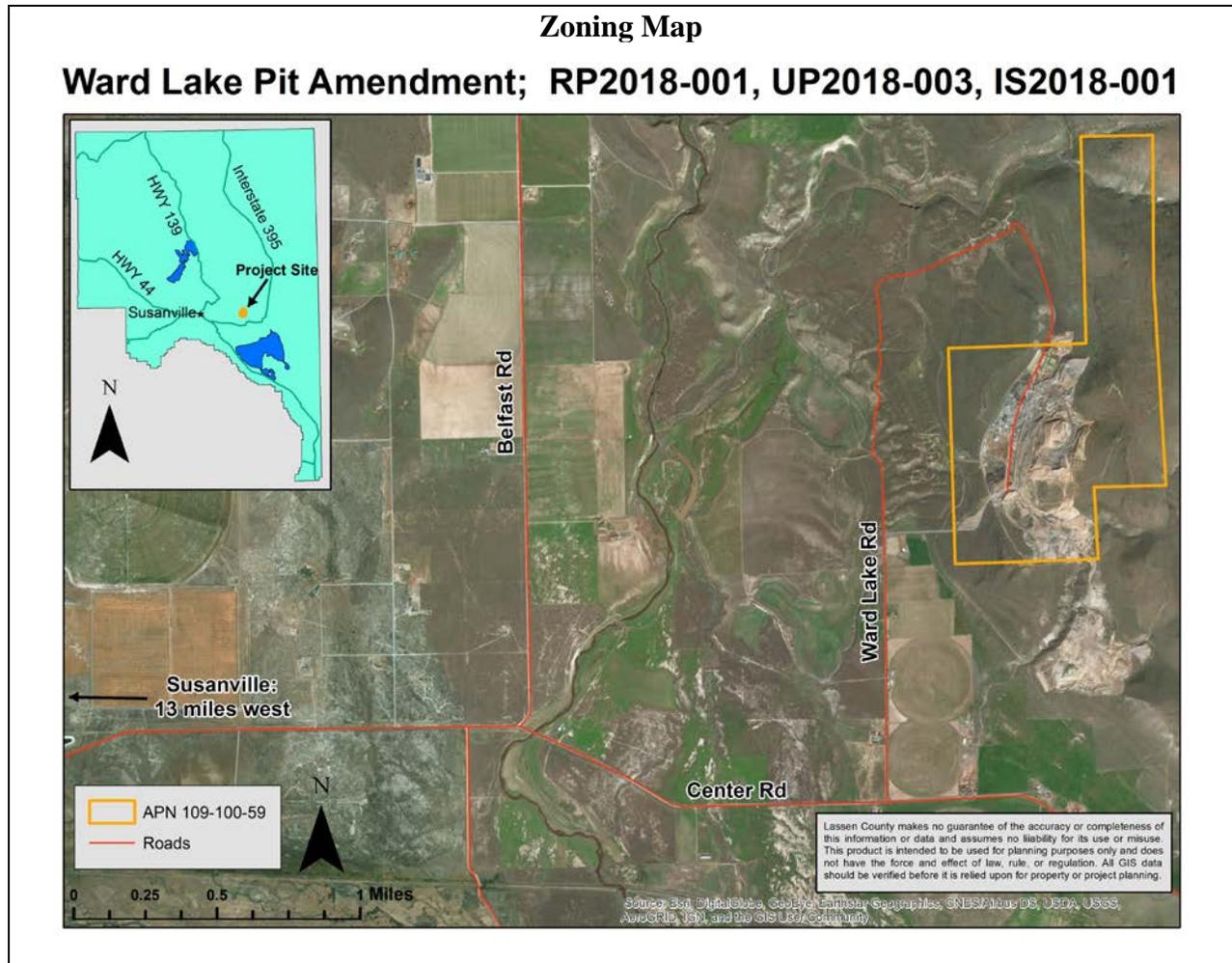
- Lahontan Regional Water Quality Control Board (RWQCB)
- Lassen County Air Pollution Control District (APCD)
- Department of Conservation, Division of Mine Reclamation (DMR)

SURROUNDING LAND USE: The project site is zoned Upland Conservation, Resource Management District. Lands immediately adjacent to the project area are zoned Open Space District; Upland Conservation District; Upland Conservation, Agricultural Preserve Combining District; and Agricultural Residential 20 Acre Building Site, Agricultural Combining District. The *Standish-Litchfield Area Plan* classifies these surrounding lands as Extensive Agriculture, Open Space, and Agricultural Residential. The area surrounding the site is primarily used for agriculture and open space. The nearest residence is approximately 875 feet from the western property line of the project parcel. This residence was constructed in 2005.

	Zoning	Parcel Size (acres)	Land Use Designation <i>(Lassen County General Plan 2000)</i>
Site	U-C-2	442	Extensive Agriculture
North	U-C, U-C-A-P	8 - 212	Open Space (Public Lands)
East	U-C-A-P, O-S	246 - 350	Open Space (Public Lands)
South	O-S	19 - 498	Open Space (Public Lands), Extensive Agriculture
West	U-C, A-2-B-20-A	9 - 269	Agricultural Residential, Extensive Agriculture

Ward Lake Pit Amendment RP2018-001, UP2018-003, IS2018-001





Vicinity Map

Previous Environmental Documents:

This mining operation was first approved through Use Permit 79-80-44. The 1981 Final Environmental Impact Report for Operation of Aggregate Materials Source, Operation of Rock Crushing Plant, Operation of Asphalt Concrete Batch Plant (Applicant: Miller's Custom Work) was certified as the environmental document for the project. Subsequently, Use Permit 11-02-85 amended a condition regarding the resurfacing of Ward Lake Road. On August 3, 1994, Use Permit 94032 was approved, which allowed for expansion of the mine and the addition of a concrete batch plant. On September 23, 1997, Board of Supervisors Resolution No. 97-067 was adopted to approve Use Permit 96056 and Reclamation Plan 96056, which rezoned land to allow for concrete production, allowed for year road operations (with limited winter activities), and further expanded the mine to its current 160-acre boundary. Said resolution established the current conditions of approval for the mining operation. The Miller's Custom Work, Inc. Ward Lake Pit Expansion Final EIR was certified as the environmental document for said amendment.

The purpose of this Initial Study is to determine the appropriate environmental document for the proposed project. The changes to the mining operations discussed herein require a use permit

amendment (pursuant to Chapters 9.60 and 18.112 of the Lassen County Code) and a reclamation plan amendment. Said amendments are subject to the California Environmental Quality Act (CEQA).

The appropriate environmental document for the subject use permit and reclamation plan amendments is determined in accordance with section 15162 of the CEQA Guidelines. Said section requires a subsequent EIR in any of the following instances:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

This Initial Study will show that the proposed amendments would introduce new potentially significant environmental effects. As such, in accordance with section 15162, a subsequent EIR is the appropriate environmental document for the proposed use permit and reclamation plan amendments. However, CEQA Guidelines section 15163 allow the preparation of a supplement to an EIR, instead of a subsequent EIR, provided the following are applicable:

1. Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and
2. Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

The second of the above findings, that only minor additions or changes would be necessary to make the previous EIR adequately apply, cannot be made because of the following:

- The amendment would allow continuous 24 hour operations (April 1 – December 31, as mitigated by the applicant), Monday through Saturday, whereas currently hours are restricted to 6:00 a.m. to 7:00 p.m., Monday through Saturday. This is approximately a 163 percent increase in the number of hours the mine could operate.
- The amendment would extend the life of the mine an additional 10 years.
- The amendment would increase the number of truck trips from 10 per day (55 per week) to an average of 26 per day (with up to 150 per day during peak operations).

The above amendments are not considered “minor additions or changes”. As such, a supplement to an EIR is not appropriate and a subsequent EIR is required pursuant to CEQA Guidelines section 15162.

1. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION:

a) No change in the project site is proposed.

b) The project’s proposed increase in truck trips is potentially in conflict with the *Lassen County General Plan 2000 Land Use Element and Circulation Element* and the *Standish-Litchfield Area Plan Circulation* section.

Lassen County General Plan 2000 Land Use Element

GOAL L-11: Transportation systems which compliment and support the County’s land use patterns.

LU-25 POLICY: The County shall continue to review and, when warranted, formulate improved standards for the necessary improvement and maintenance of roads serving new development, including standards for the incremental improvement or development of public roads.

LU-26 POLICY: When proposed projects which would generate a substantial number of large trucks carrying heavy loads, the County shall require special mitigation measures to insure that those projects do not cause significant deterioration of County roads, or will otherwise mitigate such damage with adequate repair.

Implementation Measure LU-R: Pursuant to impacts evaluated in an environmental impact report or other form of project review, the County may require mitigation measures which will insure that project developers adequately and fairly compensate or participate with the

County in the necessary upgrading and/or repair of roads which will be significantly damaged by a project.

LU-27 POLICY: The County shall refer to the Circulation Element for additional policies and implementation measures which relate to land use issues.

Lassen County General Plan 2000 Circulation Element

CE-12 POLICY: No public highway or roadway should be allowed to fall to or exist for a substantial amount of time at or below a Level of Service rating of “E” (i.e., road at or near capacity; reduced speeds; extremely difficult to maneuver; some stoppages).

Standish-Litchfield Area Plan – Circulation

Policy 17-A: It shall be a policy of Lassen County to provide a transportation system that provides safe and efficient service for the travel needs of all citizens, the movement of goods and as a means to implement the goals and objectives of this plan.

Implementation 17.3: Prior to the approval of all new projects, the County shall evaluate the potential effect on existing traffic patterns and shall require as a condition of approval, any improvements or in lieu fees necessary to alleviate potential traffic congestion and/or to ensure traffic safety throughout the Planning Area.

Implementation 17.4: The Planning Commission should determine during the public hearing process which public and private roads should be upgraded and to which standards they should be improved to.

The Lassen County Department of Public Works responded during early consultation. They discussed the need for a traffic study on roads affected by the project, in order to ascertain whether improvements, such as turn lanes or road rehab, would be necessary to offset the proposed increased travel load. Road improvements and/or in lieu fees or a fair share agreement should be executed, as identified as necessary by the Lassen County Department of Public Works, after a proper traffic study is conducted. Currently, there is not enough information to determine if impacts can be mitigated to a less than significant level.

On April 26, 2018, the applicant submitted a traffic study to assist with the Ward Lake Pit, Use Permit Amendment Initial Study (IS). Due to a number of deficiencies, as outlined in the attached letter to VESTRA Resources, dated May 8, 2018, the traffic study does not provide adequate support for a finding that traffic impacts are less than significant under the California Environmental Quality Act (CEQA).

The project may also conflict with the *Standish-Litchfield Area Plan*. The project area is identified in said plan as Antelope Winter Range and as a “10: Most Important” on the Sensitivity Index. Board Resolution 97-067 Exhibit One discusses adverse impacts to deer herds and antelope herds, leading to the partial closure of the site from January 1 through March 31

each year (Condition #21). The purpose of this partial closure, as recommended by the Planning Commission, was to “substantially reduce impacts to deer and antelope by limiting the most disruptive mining activities during the critical time period.” Impacts of 24-hour operations and increased truck traffic on wildlife are not discussed in the application. Despite the fact that there is no newly proposed physical disturbance, wildlife could be disturbed by additional noise, light, and traffic (especially at night).

During early consultation, the California Department of Fish and Wildlife (CDFW) also suggested downward facing lighting, reducing noise levels or using noise barriers, and the inclusion of a detailed analysis of impacts from potential vehicle collisions, within the environmental document. A biological survey needs to be conducted to confirm that no additional special status species are present in the project area (see section 7. Biological Resources).

Lassen County General Plan 2000 Land Use Element

GOAL L-22: Protection and enhancement of important wildlife habitats to support healthy, abundant and diverse wildlife populations.

LU-49 POLICY: The County supports the management of wildlife resources in ways that enhance the health and abundance of wildlife populations and the diversity of species and their habitats and which, at the same time, balance management policies and program objectives with the range of social and economic needs for which the County is also responsible.

Lassen County Noise Element

The proposed project is also in conflict with policies of the *Lassen County Noise Element* (see section 10. Noise).

The proposed project is consistent with the U-C-2 zoning and the *Lassen County General Plan 2000* designation of Extensive Agriculture.

c) Lassen County does not have a specific habitat conservation plan or natural community conservation plan and defers to the direction of the CDFW. No conflicting plan was identified by the CDFW during early consultation.

MITIGATION:

LP-1 (applicable to section b): The applicant will continue limited winter operations (Resolution No. 97-067, Condition #21).

LP-2 (applicable to section b): The applicant will limit 24-hour operations to April 1 – December 31 annually, except in a state of emergency, as declared by the local Emergency Services Director and/or the Board of Supervisors and/or the City of Susanville.

LP-3 (applicable to section b): The applicant will not grade/excavate between 7:00 p.m. and 6:00 a.m. or blast between 6:00 p.m. and 7:00 a.m.

LP-4 (applicable to section b): Full shield light fixtures will be used for lighting at night, only low beams will be used on trucks, and lighting would be directed internally to site and berm when possible.

LP-5 (applicable to section b): “Reduce speed” signs [must specify speed limit] will be posted by the operator for trucks on the access road and Ward Lake Road and “reduce use of Jake brake” signs [must be NO use] will be posted by the operator on the access road and at the Center Road and Ward Lake Road intersection.

2. POPULATION AND HOUSING. Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION :

- a) No new development/infrastructure is being proposed and no additional employees are anticipated.
- b) Existing housing will not be displaced by the project, as it does not propose expansion or relocation of the mining operation.
- c) No people will be displaced by the project, as it does not propose expansion or relocation of the mining operation or additional employees.

3. GEOLOGIC PROBLEMS. Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION:

a-e) There is no proposed change to the location or type of mining. The current 160-acre mining boundary was permitted September 23, 1997. There is no existing or proposed septic system or wastewater disposal system on site.

4. HYDROLOGY AND WATER QUALITY. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?
- i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- j) Inundation by seiche, tsunami, or mudflow?

DISCUSSION:

a,c-j) There is no proposed change to the location, type of mining, drainages/sediment ponds, or on-site structures; therefore, no additional impacts to hydrology and water quality are expected to result from the proposed project. The operation is subject to Conditions 4 and 5 of Resolution No. 97-067, requiring all necessary permits from the Lahontan Regional Water Quality Control Board (RWQCB) and/or the State Water Resources Board be secured and a Spill Prevention and Countermeasure Plan be approved by the RWQCB.

b) Well water is used by the current operation for wet suppression of on-site dust. The applicant estimates 0-6 truckloads of water per day (4,000g/load) during daytime operations, with an average of 4-5 loads, and 0-4 loads per day during nighttime operations, with an average of 2-3 loads. The applicant does not anticipate additional shifts, but instead anticipates a portion of the current daytime work changing to nighttime work. If this is the case, permitting night operations has the potential to decrease groundwater use. However, if operations used the maximum amount of loads per night in addition to the maximum per day over the maximum 6 days per week year-round, an approximate total of 38.3 AFA of groundwater would be used (22.98 AFA during daytime operations and 15.32 AFA during nighttime operations).

The project site is located within the Honey Lake Valley Groundwater Basin, which has been identified as a “low priority basin” by the Department of Water Resources, signifying that it is not currently at risk for overdraft. Within this basin, California’s Bulletin 118 estimates the total volume of water stored in the upper 100 feet of saturated basin-fill deposits and volcanic-rock aquifers to be 10 million acre-feet. Estimates of groundwater extraction for agricultural, municipal and industrial, and environmental wetland uses are 51,000, 15,000, and 3,800 acre-feet, respectively. Deep percolation from agricultural applied water is estimated to be 14,000 acre-feet.

A review of groundwater levels for monitored wells in the project area, found in the Department of Water Resources (DWR) Water Data Library, showed no trend or pattern indicating overdraft in the basin.

While the amount of groundwater used by the surface mining operation may be impacted by the proposed amendments, the project is not expected to create a demand for water in excess of available supplies and said impacts are expected to be less than significant.

5. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION:

a,b) No changes to the asphalt plant operations are being proposed and concrete production will still be limited to 12,000 cubic yards per year, which was analyzed under the previous environmental document. Increased dust may result from the proposed increases in truck traffic and 24-hour operations, but a condition is already in place, requiring wet suppression for the control of dust from excavation, processing activities, and on haul roads at all times (Resolution No. 97-067, Condition #16). This condition will continue to apply; consequently, any changes in dust will have less than significant impacts. Air quality requirements for this operation are managed by the Lassen County Air Pollution Control District (APCD). Permits from the APCD are required for operations (Resolution No. 97-067, Condition #3), the operator is required to submit annual reports to APCD (Resolution No. 97-067, Condition #25) and the site is monitored by APCD for compliance.

During early consultation, APCD was notified of the project and did not identify conflict with any applicable air quality plan. Addressed by APCD were the need for continued wet suppression of fugitive dust and the potential health risks associated with the diesel exhaust from the previously permitted electrical generator engines.

c) Lassen County is not on the Environmental Protection Agency (EPA) list of Current Nonattainment Counties for All Criteria Pollutants.
 (<https://www3.epa.gov/airquality/greenbook/ancl.html> - current as of 4/30/2018; accessed on 5/14/2018)

d,e) Although the extended hours of the asphalt plant and additional truck emissions resulting from the proposed increase in truck trips have the potential to expose the adjacent residences to additional odors and pollutants, these impacts are expected to be less than significant. No changes are being proposed to the permitted asphalt production, meaning that while a portion of the plant operations may take place at night, the total amount of odors or pollutants produced by the plant will remain unchanged. Potential truck emissions were analyzed using the Environmental Protection Agency (EPA) Diesel Emissions Quantifier tool (<https://cfpub.epa.gov/quantifier/index.cfm?action=results.quantify>) and the Bay Area Air Quality Management District (BAAQMD) air quality thresholds of significance. The proposed 150 truck trip maximum was analyzed for a total round trip distance of 30 miles per truck, at an average gas mileage of 5.9 miles per gallon, over 365 days per year (worst case scenario), resulting in 278,389 gallons of gasoline annually. This information was entered into the EPA Diesel Emissions Quantifier, yielding annual results in short tons of 3.625 for oxides of nitrogen (NOx), 0.082 for particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less (PM_{2.5}), and 0.232 for hydrocarbons (HC). Significance thresholds identified by the BAAQMD are 10 tons per year each for NOx, PM_{2.5}, and reactive organic gases (ROG; the equivalent of HC). Doubling the round trip distance to 60 miles per truck would still yield results below these thresholds.

6. TRANSPORTATION/TRAFFIC. Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Result in inadequate emergency access? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Rail, waterborne or air traffic? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION:

An increase in permitted truck trips is proposed, going from the current 10 trips per day and 55 trips per week to an average of 26 trips per day, with 150 trips per day under peak conditions (an estimated 20-40 days per year). Truck traffic may be spread across daytime and nighttime operations (project specific).

a,b) The proposed project is potentially in conflict with both the *Lassen County General Plan 2000 Circulation Element* and the *Standish-Litchfield Area Plan Circulation* section. As discussed, this is a potentially significant impact.

Lassen County General Plan 2000 Circulation Element

CE-6 POLICY: The County shall continue to review and, when warranted, formulate improved standards for the necessary improvement and maintenance of roads serving new development, including standards for the incremental improvement or development of public roads.

CE-10 POLICY: In consideration of proposed projects which would generate a substantial number of large trucks carrying heavy loads, the County shall require special mitigation

measures to insure that those projects do not cause, or will adequately mitigate, significant deterioration of County roads.

Implementation Measure CE-C: Pursuant to impacts evaluated in an environmental impact report or other form of project review, the County may require mitigation measures which will insure that project developers adequately and fairly compensate or participate with the County in the necessary upgrading and/or repair of the affected roads.

CE-12 POLICY: No public highway or roadway should be allowed to fall to or exist for a substantial amount of time at or below a Level of Service rating of “E” (i.e., road at or near capacity; reduced speeds; extremely difficult to maneuver; some stoppages).

Standish-Litchfield Area Plan – Circulation

Policy 17-A: It shall be a policy of Lassen County to provide a transportation system that provides safe and efficient service for the travel needs of all citizens, the movement of goods and as a means to implement the goals and objectives of this plan.

Implementation 17.3: Prior to the approval of all new projects, the County shall evaluate the potential effect on existing traffic patterns and shall require as a condition of approval, any improvements or in lieu fees necessary to alleviate potential traffic congestion and/or to ensure traffic safety throughout the Planning Area.

Implementation 17.4: The Planning Commission should determine during the public hearing process which public and private roads should be upgraded and to which standards they should be improved to.

The Lassen County General Plan 2000 Circulation Map identifies Center Road as a “major collector.”

During the most recent environmental review and permitting process (the 1997 Environmental Impact Report), as many as 26 daily truck trips were anticipated and considered. This 26 trips was discussed as a daily estimate, not an average, and was considered to be less than significant with mitigation. However, impacts of 150 truck trips within one day were not discussed and could have impacts, not only as a circulation or road deterioration concern, but also as an issue for noise, safety, public services, wildlife, and aesthetics.

The Lassen County Department of Public Works responded during early consultation. They discussed the need for a traffic study on roads affected by the project, in order to ascertain whether improvements, such as turn lanes or road rehab, would be necessary to offset the proposed increased travel load. Road improvements and/or in lieu fees or a fair share agreement should be executed, as identified as necessary by the Lassen County Department of Public Works, after a proper traffic study is conducted. Currently, there is not enough information to determine if impacts can be mitigated to a less than significant level.

On April 26, 2018, the applicant submitted a traffic study to assist with the Ward Lake Pit, Use Permit Amendment Initial Study (IS). Due to a number of deficiencies, as outlined in the attached letter to VESTRA Resources, dated May 8, 2018, the traffic study does not provide adequate support for a finding that traffic impacts are less than significant under the California Environmental Quality Act (CEQA).

The proposed project is consistent with the U-C-2 zoning and the *Lassen County General Plan 2000* designation of Extensive Agriculture.

c) Air traffic is not a part of the proposed project.

d) No change in design features is proposed. The existing design was analyzed by the previous environmental document and the impact was concluded to be less than significant.

e) The proposed project could result in intersection congestion on Center Road, inhibiting efficient travel of emergency vehicles along this route. This potential for restricted emergency access and increased response times is considered a potentially significant impact on fire and emergency services. Without knowing the frequency of trucks entering and exiting the project site, there is not enough information to determine if impacts can be mitigated to a less than significant level. Due to a number of deficiencies, the submitted traffic study does not provide adequate support for a finding that traffic impacts are less than significant under CEQA.

The Lassen County Department of Public Works responded during early consultation. They discussed the need for a traffic study on roads affected by the project, in order to ascertain whether improvements, such as turn lanes or road rehabilitation, would be necessary to offset the proposed increased travel load. Road improvements and/or in lieu fees or a fair share agreement should be executed, as identified as necessary by the Lassen County Department of Public Works, after a proper traffic study is conducted. Currently, there is not enough information to determine if impacts can be mitigated to a less than significant level.

f) No policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities are relevant to this area.

g) No changes in rail, waterborne, or air traffic are proposed as part of this project.

MITIGATION:

TT-1 (applicable to sections a,b,e) “Reduce speed” signs [must specify speed limit] will be posted by the operator for trucks on the access road and Ward Lake Road. No additional mitigation measures to reduce these traffic impacts were proposed by the applicant.

7. BIOLOGICAL RESOURCES. Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse 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 Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION:

There is no proposed change to the location or type of mining. The current 160-acre mining boundary was permitted September 23, 1997. However, despite no newly proposed physical disturbance, wildlife could be disturbed by additional noise, light, and traffic (especially at night).

a) Comments were received from the California Department of Fish and Wildlife (CDFW) during early consultation. The CDFW comments included their concern for the potential disturbance of special status species due to noise, light, and traffic produced by the proposed project, if any are present. The CDFW suggested reducing noise levels or using noise barriers, including a detailed analysis of impacts from potential vehicle collisions in the environmental document, and using downward facing, fully-shielded lighting. Lighting is also addressed by Lassen County Code Section 18.108.155, which states in part that “all lighting, exterior and interior, shall be designed and located so as to confine direct lighting to the premises. A light source shall not shine upon or illuminate directly on any surface other than the area required to be lighted.” It was recommended by the CDFW that the site be surveyed within the undisturbed portion of the project area, at the appropriate time of year, to confirm which species exist on and/or near the project site. Currently, there is not enough information to determine if impacts can be mitigated to a less than significant level.

b) There is no riparian habitat present at the site. Wintering deer and antelope herds may be considered sensitive natural communities under this section, as identified by the *Standish-Litchfield Area Plan*. Impacts will be mitigated to less than significant by eliminating nighttime operations during winter months and by extending the grading, excavating, and blasting restrictions of Board Resolution 97-067, Condition #21 to all nighttime activities.

c) No federally protected wetlands are present at this site.

d) The project area is identified in the *Standish-Litchfield Area Plan* as Antelope Winter Range and as a “10: Most Important” on the Sensitivity Index. Impacts to wintering deer and antelope herds during daytime operations were analyzed during a previous amendment. Board Resolution 97-067 Exhibit One discusses adverse impacts to deer herds and antelope herds, leading to the partial closure of the site from January 1 through March 31 each year (Condition #21). The purpose of this partial closure, as recommended by the Planning Commission, was to “substantially reduce impacts to deer and antelope by limiting the most disruptive mining activities during the critical time period.” Impacts of 24-hour operations and increased truck traffic on these species will be mitigated to less than significant by seasonal and nighttime restrictions.

e) There are no such local policies or ordinances.

f) There are no such local plans and comments from the CDFW did not include conflict with any state habitat conservation plan.

MITIGATION:

BR-1 (applicable to sections a,b,d): The applicant will continue limited winter operations (Resolution No. 97-067, Condition #21).

BR-2 (applicable to sections a,b,d): The applicant will limit 24-hour operations to April 1 – December 31 annually, except in a state of emergency, as declared by the local Emergency Services Director and/or the Board of Supervisors and/or the City of Susanville.

BR-3 (applicable to sections a,b,d): The applicant will not grade/excavate between 7:00 p.m. and 6:00 a.m. or blast between 6:00 p.m. and 7:00 a.m.

BR-4 (applicable to sections a,b,d): Full shield light fixtures will be used for lighting at night, only low beams will be used on trucks, and lighting would be directed internally to site and berm when possible.

BR-5 (applicable to sections a,b,d): “Reduce speed” signs [must specify speed limit] will be posted by the operator for trucks on the access road and Ward Lake Road and “reduce use of jake brake” signs [must be NO use] will be posted by the operator on the access road and at the Center Road and Ward Lake Road intersection.

8. MINERAL RESOURCES. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION:

a,b) There is no proposed change to the location or type of mining. The current 160-acre mining boundary was permitted September 23, 1997. There is also no proposed change for total site production. The current operation boundary, mining type, and production amount were analyzed under a previous environmental document and the impact was concluded to be less than significant.

9. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION:

a,b) No changes to mineral or asphalt production are being proposed. The existing permitted mineral and asphalt production amount were analyzed under a previous environmental document and the impact was concluded to be less than significant. Additionally, the operation is required to have necessary permits from Lassen County Environmental Health for storing hazardous materials. Operations will continue to follow the applicable laws and regulations regarding hazardous material transport, as defined in Section 353 of the California Vehicle Code.

c) The nearest school (Shaffer Elementary) is over 2 miles from the site (as the crow flies).

d) There is no proposed change to the location or type of mining. The current 160-acre mining boundary was permitted September 23, 1997.

e) The project site is not within an airport land use plan and is approximately 8 miles from the nearest public or public use airport.

f) There is no proposed change to the location of the mining operation and it is not in the immediate vicinity of a private airstrip.

g) The proposed project will not affect any emergency evacuation routes.

h) The proposed nighttime operations may add to the risk of a fire starting on site at night. However, wildfire spreading is reduced at night, due to increased relative humidity and decreased temperature and wind. The potential of fire to spread to the few residences in the area is low, due to the roads and agricultural land use. Additionally, it is expected that operations will move from day to night (project specific), without additional shifts. Because the volume of mining is not increasing, but rather undergoing a change in its timing, the cumulative risk for wildfire will not increase.

10. NOISE. Would the project result in:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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 expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION:

An increase in permitted truck trips is proposed, from the current 10 trips per day and 55 trips per week to an average of 26 trips per day, with 150 trips per day under peak conditions (an estimated 20-40 days per year). Truck trips will be spread across daytime and nighttime operations. The applicant is also proposing 24-hour asphalt plant and crusher operations (currently, operations are permitted from 6:00 a.m. to 7:00 p.m.). The submitted Use Permit Project Detail Supplement identifies a proposed noise level of 80-90 dB at a distance of 50 feet during daytime operations and proposed noise levels at the nearest property line of 70 dB during daytime operations and 65 dB during nighttime operations. A noise study is needed to determine actual noise levels of the proposed operations.

a) Resolution No. 97-067, Condition #28 identifies noise standards of the 1989 Noise Element, pg. 21 #19 and Table III, pg. 19. Table III shows that daytime noise levels must stay below 70 dBA and nighttime noise levels must stay below 60 dBA (noise level is as measured at the nearest affected residentially designated lands and the noise standard varies with the cumulative number of minutes the noise lasts in any one-hour time period).

Lassen County Noise Element, IV Implementation Program

Policy 1. Noise created by locally-regulated noise sources associated with new projects or developments shall be controlled so as not to exceed the noise level standards as set forth [in Table III] as measured from any affected residentially designated lands or land use situated in either the incorporated or unincorporated areas. New residential development shall not be allowed where the ambient noise level due to locally-regulated noise sources will exceed noise level standard set forth [in Table III]. These standards do not apply to residential units established in conjunction with industrial or commercial uses (e.g., caretaker dwellings).

Policy 3. Areas within Lassen County shall be defined as noise-impacted if exposed to existing or projected exterior noise levels exceeding either 60 dB Ldn/CNEL or the performance standards of Table III.

Policy 4. New development of residential land uses will not be permitted in noise-impacted areas unless the project design include effective mitigation measures to reduce noise to the following levels:

A. For noise due to traffic on public roadways, railroad line operations and aircraft in flight: 60 dB Ldn/CNEL or less in outdoor activity areas, and 45 dB Ldn/CNEL or less in indoor areas. Where it is not possible to reduce exterior noise to 60 dB Ldn/CNEL or less by incorporating a practical application of the best available noise-reduction technology, an exterior noise level of up to 65 dB Ldn/CNEL will be allowed. Under no circumstances will interior noise levels be permitted to exceed 45 dB Ldn/CNEL with the windows and doors closed.

[Although the above discusses policy for development of residential land uses, it may be applicable to a determination of significance in the present case.]

Policy 7. Noise produced by commercial uses shall not exceed 67.5 dB Ldn/CNEL at the nearest property line.

Policy 8. Noise produced by industrial uses shall not exceed 70 dB Ldn/CNEL at the nearest property line.

Policy 12. Lassen County shall prepare a community noise control ordinance in accordance with the following policies and procedures:

C. The intent of the draft ordinance shall be to protect persons from excessive levels of noise which interfere with sleep, communication, relaxation, health or legally permitted use of property, whether such noise if from existing or future sources.

D. "Excessive" levels of noise shall be defined as levels which exceed the standards of Table III and other policies of the Noise Element.

As proposed, the project exceeds the noise level performance standards of Table III and the project area would be considered noise impacted, according to Policy 3 of the *Lassen County Noise Element, IV Implementation Program*. Additionally, the proposed project has the potential to affect the community noise environment, as described by Figure 4 of the Noise Element. Although the 1997 Environmental Impact Report states that "traffic noise impacts in very low-density residential areas with speeds of approximately 35 mph do not typically become a concern warranting specific analysis until traffic levels reach approximately 125 trips/hour (A-V Group, personal communication, March 1997)," there is not enough information known to apply this statement to the proposed project. A noise study should be conducted, as there is currently not enough information to determine if impacts can be mitigated to a less than significant level. As such, this impact is considered potentially significant.

b) Plant equipment, crusher equipment, and trucks on site and traveling Ward Lake Road could increase groundborne vibration or noise levels at night, while nearby residents may be sleeping. A noise study should be conducted, as there is currently not enough information to determine if impacts can be mitigated to a less than significant level. As such, this impact is considered potentially significant.

c,d) A 1988 Community Noise Study identified an estimated day-night average noise level (Ldn) of 43.7 dBA at the intersection of CR 218 (Chappius Ln) at CR 211 (Lake Leavitt Rd), approximately 3.5 miles from the project site. The mining operation currently has permitted operations during daytime hours, but the proposed nighttime plant and crusher operations are predicted to cause both permanent (e.g. generator, crusher, plant) and temporary (e.g. haul trucks, jake brake) increases in ambient noise levels in the project vicinity above levels existing without the proposed project. A noise study should be conducted, as there is currently not enough information to determine if impacts can be mitigated to a less than significant level. As such, this impact is considered potentially significant.

e) The project site is not within an airport land use plan and is approximately 8 miles from the nearest public or public use airport.

f) There is no proposed change to the location of the mining operation and it is not in the immediate vicinity of a private airstrip.

MITIGATION:

NO-1 (applicable to sections a,b,c,d): “Reduce speed” signs [must specify speed limit] will be posted by the operator for trucks on the access road and Ward Lake Road and “reduce use of jake brake” signs [must be NO use] will be posted by the operator on the access road and at the Center Road and Ward Lake Road intersection.

NO-2 (applicable to sections a,b,c,d): The applicant will continue limited winter operations (no grading, excavating or blasting - Resolution No. 97-067, Condition #21).

NO-3 (applicable to sections a,b,c,d): The applicant will limit 24-hour operations to April 1 – December 31 annually.

NO-4 (applicable to sections a,b,c,d): The applicant will not grade/excavate between 7:00 p.m. and 6:00 a.m. or blast between 6:00 p.m. and 7:00 a.m.

NO-5 (applicable to sections a,b,c,d): During nighttime operations, trucks will only turn right onto Center Rd from Ward Lake Rd, to avoid the Litchfield residential area.

Because a noise study was not submitted, there is currently not enough information to determine if impacts can be mitigated to a less than significant level.

11. PUBLIC SERVICES.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION:

a,b) The addition of nighttime operations could increase the risk of on-site fires, but this is not anticipated to affect service ratios, response times or other performance objectives for fire protection services. As such, this impact is considered less than significant.

c-f) There is no proposed change to the location or type of mining. The current 160-acre mining boundary was permitted on September 23, 1997. As the project does not propose expansion or relocation of the mining operation or additional employees, and therefore will not add to needed services, it will not impact police protection, schools, parks, or other public facilities.

12. UTILITIES AND SERVICE SYSTEMS.

Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION:

a) Necessary permits were secured from the Lahontan RWQCB and/or State Water Resources Board prior to the start of current operations. No applicable changes are being proposed. Existing conditions were already analyzed by the previous environmental document.

b,e) No new or expanded water or wastewater treatment facilities are proposed. Existing conditions were already analyzed by the previous environmental document.

c) No new or expanded stormwater drainage facilities are proposed. Existing conditions were already analyzed by the previous environmental document.

d) Well water is used by the current operation for wet suppression of on-site dust. While the amount of groundwater used by the surface mining operation may be impacted by the proposed amendments, the project is not expected to create a demand for water in excess of available supplies and said impacts are expected to be less than significant. (see section 4. Hydrology and Water Quality)

f,g) No changes that would affect solid waste are being proposed.

13. AESTHETICS. Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated Less Than Significant	Less Than Significant Impact	No Impact
	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION:

a) The *Standish-Litchfield Area Plan* and the *Lassen County Energy Element* identify scenic corridors. The project appears to be outside any scenic corridor. There are no known scenic vistas identified.

b) There is no proposed change to the location or type of mining or to the total site production. The current 160-acre mining boundary was permitted September 23, 1997. The existing permitted location and type of mining were analyzed under a previous environmental document and the impact was concluded to be less than significant.

c,d) The proposed project has the potential to affect the project area aesthetically, due to changes in lighting. The project proposes 24-hour operations, extending the hours of the existing lighting, currently used only in the early morning and evening. While the lights will be used more frequently (e.g. at night), no new lights are proposed. The existing lights used in the early morning and evening will be utilized.

Lighting is addressed by Lassen County Code Section 18.108.155, which states: “Unless otherwise provided in this title, the following lighting requirements shall apply: all lighting, exterior and interior, shall be designed and located so as to confine direct lighting to the premises. A light source shall not shine upon or illuminate directly on any surface other than the

area required to be lighted. No lighting shall be of the type or in a location so as to constitute a hazard to vehicular traffic, either on private property or on abutting streets. (Ord. 467-AC § 28, 2003.)”

A visual simulation analysis was conducted by VESTRA for on-site lighting at night (see Visual Simulation Analysis Section 3.3 Conclusions, pg. 17). VESTRA concluded that although visible from five residences along Ward Lake Road, the project should not cause a significant impact on the visual character of the area. Much of the area already experiences light from the California Correctional Center and/or is managed by the State of California or Federal land management agencies and does not have residences.

An increase in permitted truck trips is proposed, from the current 10 trips per day and 55 trips per week to an average of 26 trips per day, with 150 trips per day under peak conditions (an estimated 20-40 days per year). Said trucks will travel local roads and highways, degrading the existing visual character of the site and its surroundings through the use of headlights. These truck lights may add substantial light and/or glare which could affect nighttime aesthetics in the area. In particular, said headlights will impact Ward Lake Road and shine into existing homes during nighttime hours.

The previous EIR (1997) discussed visual impacts of the quarry face and determined that short-term impacts to close-in views were significant and unmitigable. Board of Supervisors Resolution No. 9-01-97 adopted a statement of overriding considerations, saying that the unmitigable impacts of the quarry face are acceptable, because the project’s benefits outweigh the unavoidable adverse impacts. The 1997 EIR, however, did not consider or discuss lighting impacts, relevant to the currently proposed project, which will result from nighttime site operations and increased truck traffic at night.

While the applicant has proposed mitigation measures to lessen these impacts, it has not been demonstrated that said impacts can be mitigated to a less than significant level. As such, this impact is considered potentially significant.

MITIGATION:

AT-1 (applicable to section c,d): Full shield light fixtures will be used for lighting at night.

AT-2 (applicable to section c,d): Lighting will be directed internally to site and berm when possible.

AT-3 (applicable to section c,d): Only low beams will be used on trucks.

AT-4 (applicable to section c,d): During nighttime operations, trucks will only turn right onto Center Road to the Leavitt Lake cutoff road to Hwy 395, in order to avoid headlights through the residential area in Litchfield.

14. 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 as defined in § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION:

a-d) There is no proposed change to the location or type of mining. The current 160-acre mining boundary was permitted September 23, 1997. No proposed change for total site production. The existing permitted location and type of mining were analyzed under a previous environmental document and the impact was concluded to be less than significant.

15. RECREATION. Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION:

a,b) The proposed project does not include recreational facilities and would have no foreseeable impact on existing recreational facilities, nor would the project increase the need for recreational services, as no additional employees are proposed. The previous environmental document analyzes this impact.

16. 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
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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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])? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION:

a-e) There is no proposed change to the location or type of mining. The current 160-acre mining boundary was permitted September 23, 1997. No additional land will be disturbed by this project. The existing permitted location and type of mining were analyzed under a previous environmental document and the impact was concluded to be less than significant.

17. 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

DISCUSSION:

The proposed project has the potential to generate additional greenhouse gas emission through the use of trucks to transport materials. An increase in permitted truck trips is proposed, from the current 10 trips per day and 55 trips per week to an average of 26 trips per day, with 150 trips per day under peak conditions (an estimated 20-40 days per year). No changes in permitted asphalt production are proposed.

a,b) The proposed 150 truck trip maximum was analyzed for greenhouse gas emissions, for a total round trip distance of 30 miles per truck, at an average gas mileage of 5.9 miles per gallon, over 365 days per year (worst case scenario). Using the EPA Greenhouse Gas Equivalencies Calculator (<https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>), it was found that the sum of the greenhouse gas emissions resulting from 278,389 gallons of gasoline is equal to 2,474 metric tons of carbon dioxide equivalent per year (MT CO₂e/yr). Doubling the round trip distance to 60 miles would then result in 4,948 MT CO₂e/yr.

There are no thresholds of significance adopted for the Northeast Plateau Air Basin. That said, the thresholds that have been proposed or adopted by other agencies were reviewed to provide an indicator as to the potential of this project to result in a significant impact. It is recognized that thresholds are likely air basin specific, but based on the CEQA significance threshold of 10,000 MT CO₂e/yr, used by the Bay Area Air Quality Management District and the Placer County Air Pollution Control District, impacts of the proposed project would be less than significant. It was found that a project of this scale is below the threshold of significance established by many (if not all) agencies.

Additionally, even though an increase in permitted truck trips is proposed, the number of trips will still be dependent on the number of roadwork projects in the area. If these roadwork projects are not served by the Ward Lake mining/asphalt operation, they will be served by a different operation. Therefore, overall emissions will not be increased due to a higher number of permitted truck trips at this site, as the number of roadwork projects in the area will not change. Facilitating roadwork projects with local materials may in fact decrease emissions by reducing travel.

18. MANDATORY FINDINGS OF SIGNIFICANCE.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project 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 self-sustaining levels, threaten to eliminate a plant or animal community, 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION:

a,b,c) The proposed project, due primarily to increases in traffic and noise, has the potential to degrade the quality of the environment, restrict the range of rare or endangered animals, and cause substantial adverse effects on human beings, either directly or indirectly. The impacts of this project, as proposed, are individually considerable, and therefore cumulatively considerable. Without a proper traffic study, noise study, and biological survey, there is not enough information to determine if these impacts can be mitigated to a less than significant level.