

California Department of Conservation
Division of Mine Reclamation

Lead Agency Review and Assistance (LARA) Program

Final Report

Prepared for:

City of Palmdale

(lead agency under the
Surface Mining and Reclamation Act of 1975)

May 2020



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LIST OF ABBREVIATIONS AND ACRONYMS USED IN THIS REPORT

Acronym	Term	Description
AB	Assembly Bill	Proposed law, introduced by a Member of the Assembly of the California Legislature during a session for consideration by the Legislature, and identified numerically in order of presentation
AR	Annual Report	Document from a surface mine operator to the Division of Mine Reclamation noting mining activity for the previous calendar year; due on July 1 of each year with the required fee
CCR	California Code of Regulations	Regulations adopted, amended, or repealed by state agencies pursuant to the Administrative Procedure Act
CEQA	California Environmental Quality Act	California statute that requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible
City	City of Palmdale	SMARA lead agency for this Lead Agency Review and Assistance Program review
CUP	Conditional Use Permit	Development permit issued by the lead agency to mine operators
DMR	Division of Mine Reclamation	Division within the California Department of Conservation established in 2017 under Senate Bill 209 (Pavley)
DOC	California Department of Conservation	A State of California department comprised of five divisions: Land Resources Protection; Mine Reclamation; California Geological Survey; California Geologic Energy Management Division, and State Mining and Geology Board
FACE	Financial Assurance Cost Estimate	Estimate of the financial cost to reclaim a surface mining operation pursuant to the requirements of the mine's approved reclamation plan
FAM	Financial Assurance Mechanism	Financial instrument established by the mine operator that is subject to forfeiture under certain conditions
IN	Inspection Notice	See NOCI
IR	Inspection Report	Regulatory form MRRC-1 to be used by the lead agency to document site inspections as required by PRC Section 2774(b)
LARA	Lead Agency Review and Assistance	Program designed as both a review of each lead agency's SMARA program and an extension of the Division of Mine Reclamation's education and outreach efforts

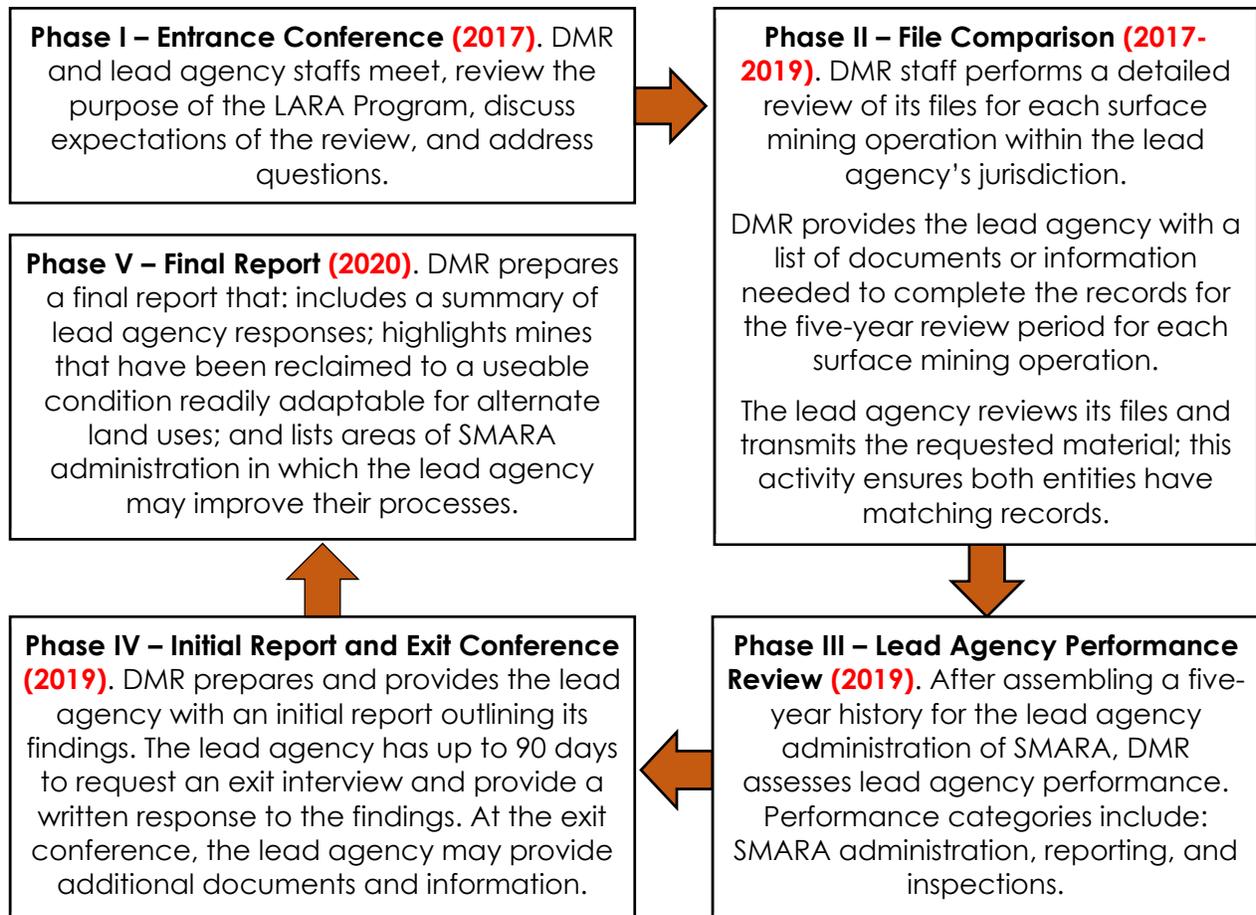
Acronym	Term	Description
NOCI	Notice of Completion of Inspection	Notice that accompanies the annual inspection report submitted by a lead agency to the Division of Mine Reclamation that includes prescribed information as required under PRC Section 2774(b)
NOV	Notice of Violation	Notice issued to a mine operator identifying site specific or administrative violations of state law
OMR	Office of Mine Reclamation	Former name of the Division of Mine Reclamation (prior to 2017)
PRC	Public Resources Code	Those provisions of current statutory laws relating to the conservation, utilization, and supervision of natural resources, including mines and mining, oil and gas, and forestry
RP	Reclamation Plan	Plan describing how mining will be conducted to minimize adverse environmental effects, mined lands will be reclaimed to a usable condition that is readily adaptable for alternate land uses, and residual hazards to public health or safety will be eliminated
SB	Senate Bill	Proposed law, introduced by a Member of the Senate of the California Legislature during a session for consideration by the Legislature, and identified numerically in order of presentation
SMARA	Surface Mining and Reclamation Act of 1975	Statute enacted in 1975 and effective in 1976 that governs surface mine operations in California; it is codified in PRC Sections 2710 through 2796.5
SMGB	State Mining and Geology Board	Regulatory, policy, and hearing body that represents the State's interests in geology, geologic, and seismologic hazards, conservation of mineral resources, and reclamation of mining lands
SOA	Statement of Adequacy	Statement by the lead agency that it finds the Financial Assurance Cost Estimate (FACE) adequate to fund complete reclamation according to the approved reclamation plan; the lead agency submits the SOA when the FACE is sent to the Division of Mine Reclamation for review and comment

EXECUTIVE SUMMARY

This Final Report provides recommendations from the Department of Conservation's Division of Mine Reclamation (DMR), pursuant to DMR's Lead Agency Review and Assistance (LARA) Program, to City of Palmdale (City), as lead agency under the Surface Mining and Reclamation Act of 1975 (SMARA; Public Resources Code [PRC] Section 2710 et seq.). The goal of the LARA Program is to ensure effective local administration of SMARA through vetted reclamation plans, comprehensive annual mine inspections, and rigorously reviewed cost estimates, in addition to uniform application of mining laws and regulations throughout California.

This Final Report reviews the City's administration of the core requirements of SMARA during the five years from 2014 through 2018 (hereafter referred to as the review period) for the eight (8) existing surface mines within the City's jurisdiction. This review period includes two years after the substantial changes to SMARA took effect in 2017 (see Attachment C). Figure ES-1 identifies the steps in the LARA Program review process, which are described in detail in the body of the Final Report.

Figure ES-1. LARA Program Review Process Flowchart with Phase Completion Date



Based on its LARA Program review, DMR staff presents the following recommendations to the City. (For details, see Section III of this Final Report.)

A. Reclamation Plans and Reclamation Plan Amendments, Permits, and Compliance Actions

1. **Recommendation #1a.** As a SMARA lead agency, the City must ensure that every surface mining operation within its jurisdiction complies with SMARA by having an approved reclamation plan, approved mining permit, and adequate financial assurance (PRC Section 2770), unless excepted by SMARA.

Recommendation #1b. The City must establish and maintain in-house measures and procedures to ensure organized record-keeping and monitoring of surface mining reclamation under its jurisdiction. The lead agency shall forward a copy of each permit and approved reclamation plan and financial assurance instrument to the director of the Department of Conservation (14 California Code of Regulations [CCR] Section 3504). Additional documents that must be submitted to DMR include:

- Approved reclamation plans or plan amendments within 60 days of their approval
- Interim Management Plans at the time of approval
- FACEs within 30 days of their approval
- FAMs at the time of approval
- Notices of Violation at the time of issuance
- Stipulated Orders to Comply at the time of issuance
- Orders imposing an administrative penalty at the time of issuance
- Notices of completion of inspection including the completed inspection form at the time of issuance
- Permits at the time of approval

Additional documents that should be submitted to DMR include:

- Administrative decision at the time of issuance following an appeal of an Order to Comply
- Notices to an operator of a violation or failure to comply with an Order to Comply or Stipulated Order to Comply
- Vested rights determinations

2. **Recommendation #2.** Implementation of annual inspections as required by SMARA provide a vehicle for assessing compliance and for initiating appropriate responses to non-compliance (e.g., enforcement action that could include a reclamation plan amendment). The City needs to cause annual inspections to occur (PRC Section 2774(b)(1)).

B. Financial Assurances

3. **Recommendation #3.** Operator submittal and lead agency approval of FACEs must comply with PRC Sections 2773.1 and 2773.4. Specific to the City and focused on post-2017 SMARA requirements:
 - a. The City shall ensure that each mining operator submits a FACE annually for review, either:
 - within 30 days of an annual inspection being conducted pursuant to PRC Section 2774, an operator shall provide an annual financial assurance cost estimate to the lead agency for review (PRC Section 2773.4(d)(1)(A))
 - within 30 days of the applicable inspection date (i.e., a date requested by the operator pursuant to PRC Section 2207 or a date set by the lead agency pursuant to PRC Section 2774(c)) should the lead agency fail to cause the inspection of the surface mining operation (PRC Section 2773.4(d)(1)(B))
 - b. For FACE submittals to DMR and per PRC Section 2773.4(a)(2), the City's process must include a statement that the financial assurance cost estimate is "adequate, complete, and consistent with Section 2773.1 Article 11 (commencing with Section 3800) of Subchapter 1 of Chapter 8 of Division 2 of Title 14 of the California Code of Regulations" and the State Mining and Geology Board (SMGB) guidelines adopted pursuant to PRC Section 2773.1.
 - c. Following approval, the City must provide a copy of the approved FACE to DMR.
4. **Recommendation #4.** The City must ensure that each surface mining operation has an adequate financial assurance mechanism to reclaim surface mining operations (PRC Sections 2736 and 2770).

C. Annual Inspections, Inspection Reports, and Inspection Notices

5. **Recommendation #5.** In compliance with SMARA (PRC Section 2774(b)(1)), the City must:
 - cause surface mining operations to be inspected in intervals of no more than 12 months
 - provide a notice of completion of inspection to the supervisor [of DMR] within 90 days of conducting the inspection
 - ensure that the notice contains a statement regarding the surface mining operation's compliance with SMARA and a copy of the completed inspection form
 - specify, as applicable, all the following:
 - (A) Aspects of the surface mining operation, if any, that were found to be inconsistent with this chapter but were corrected before the submission of the inspection form to the supervisor

- (B) Aspects of the surface mining operation, if any, that were found to be inconsistent with this chapter but were not corrected before the submission of the inspection form to the supervisor
 - (C) A statement describing the lead agency's intended response to any aspects of the surface mining operation found to be inconsistent with this chapter but were not corrected before the submission of the inspection form to the supervisor
 - (D) A statement as to whether the surface mining operation is out of compliance with an order to comply or stipulated order to comply issued by the lead agency
6. **Recommendation #6.** The City must establish and maintain in-house measures and organized procedures to ensure record-keeping and monitoring of surface mining reclamation under its jurisdiction (14 CCR Section 3504). Additionally, see Recommendation 1b above.

D. General Findings and Recommendations

7. **Recommendation #7.** The City should provide resources on its website for surface mine operators or direct them to the DMR webpage for information on SMARA: <https://www.conservation.ca.gov/dmr>
8. **Recommendation #8.** Per statute (PRC Section 2774(a)), the City must update its existing surface mining ordinance and submit the updated ordinance to the SMGB for certification to comply with SMARA. This would ensure that the ordinance is consistent with the recent changes to the SMARA statutes (see Attachment C).

I. INTRODUCTION

A. Purpose and Scope

The Department of Conservation's Division of Mine Reclamation (DMR) presents this Final Report on the City of Palmdale (City) as part of DMR's Lead Agency Review and Assistance (LARA) Program. This Final Report provides the results of a review of the City's administration of the core requirements of the Surface Mining and Reclamation Act of 1975 (SMARA; Public Resources Code [PRC] Section 2710 et seq.).¹ The review:

- is based on the records of eight existing (and not yet reclaimed) surface mining operations within its jurisdiction (see Table 1 and Figure 1)
- covers the period from 2014 through 2018 (hereafter the review period)

Table 1. Palmdale Surface Mines for the LARA Program Review

Mine ID #	Mine Name	Commodity	Area Excavated (acres) ¹
19-0001	Holliday Rock	Sand & Gravel	138
19-0002	Antelope Valley Quarry and Plant	Sand & Gravel	215
19-0008	Littlerock Quarry	Sand & Gravel	249
19-0020	Palmdale	Sand & Gravel	374
19-0026	Hi-Grade Materials Co.	Sand & Gravel	172
19-0033	Robertson's Ready Mix	Sand & Gravel	222
19-0040	Lane Quarry	Decomposed Granite	4
19-0049	75th Street Quarry	Sand & Gravel	11

Notes:

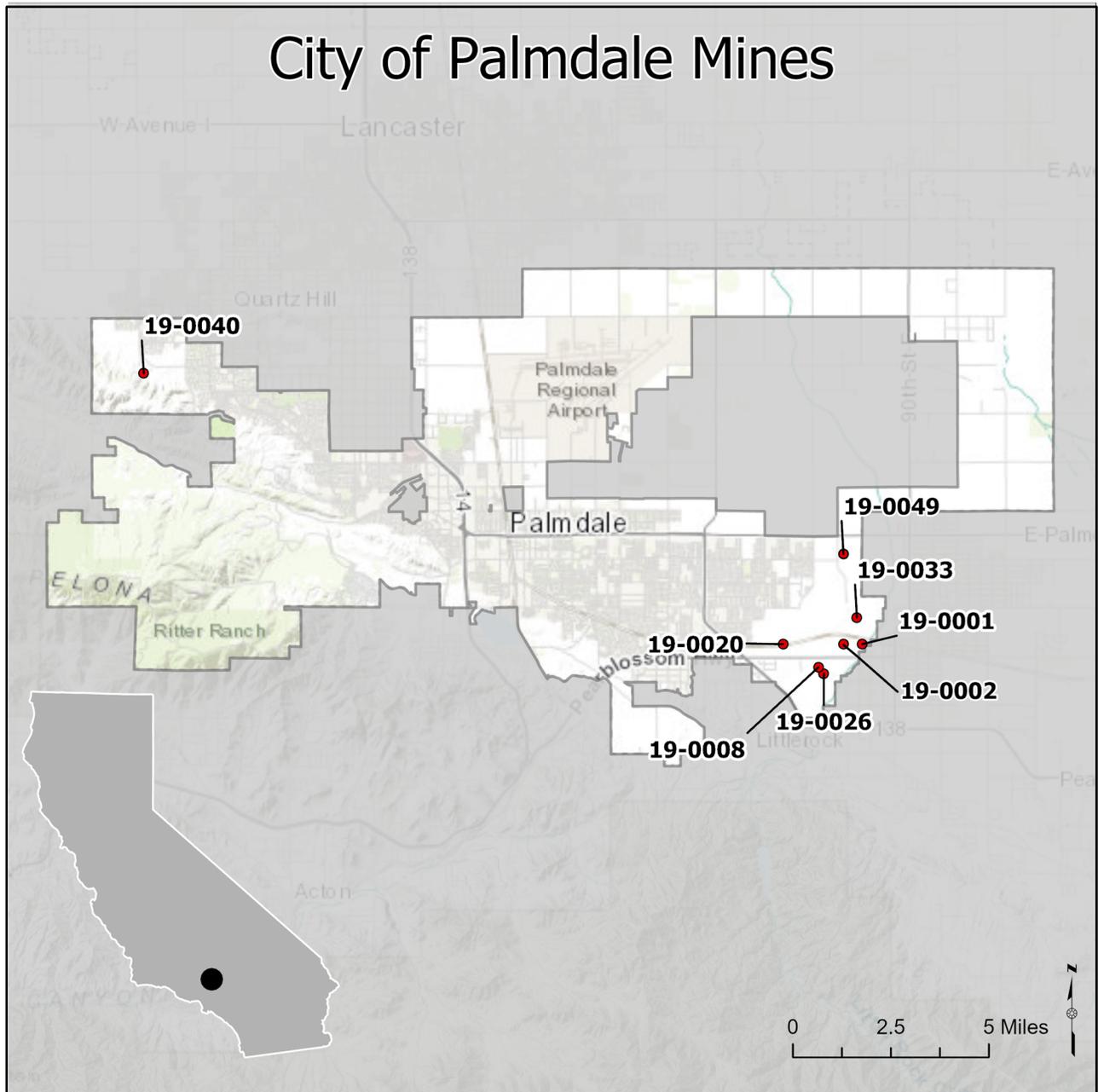
¹ Approximate value (rounded to whole acres) averaged over 5-year review period (2014-2018) from data presented in operators' annual reports.

During the review period, which included substantial changes to SMARA that took effect in 2017 (see Attachment C), SMARA lead agencies core requirements included:

- Review and approval of reclamation plans (RPs), RP amendments, and interim management plans
- Issuance of permits or other mining authorizations
- Review and approval of financial assurances
- Enforcement of mine operators' annual reporting requirements
- Conducting and completion of annual inspection requirements for all mining operations within the lead agency's jurisdiction

¹ This report does not include a review of the City's mining ordinance or its administration of the California Environmental Quality Act (CEQA).

Figure 1. Existing Surface Mines in Lead Agency's Jurisdiction during Review Period (2014-2018) *



*See mine identification legend in Table 1.

B. Regulation of Surface Mines in California

1. Overview

SMARA recognizes both the need for mined materials and the need to manage surface mining operations as reflected in the Legislature's statement of intent described under PRC Section 2712, which states:

It is the intent of the Legislature to create and maintain an effective and comprehensive surface mining and reclamation policy with regulation of surface mining operations so as to assure that:

- a) Adverse environmental effects are prevented or minimized and that mined lands are reclaimed to a usable condition which is readily adaptable for alternative land uses.*
- b) The production and conservation of minerals are encouraged, while giving consideration to values relating to recreation, watershed, wildlife, range and forage, and aesthetic enjoyment.*
- c) Residual hazards to the public health and safety are eliminated.*

2. Lead Agency's Role

California is unique among states in that the permitting of surface mines occurs through local governments acting as the lead agency. Lead agencies have the primary responsibility for the administration and enforcement of SMARA. Lead agency responsibilities include:

- Establishing mineral resource management policies and mining ordinances to be incorporated in their general plan
- Issuing a mining permit or other authorization to mine, including determining the nature and scope of vested mining rights where appropriate
- Reviewing and approving RPs and financial assurances that meet minimum SMARA requirements
- Conducting inspections of surface mines in their jurisdiction to ensure compliance with SMARA
- Taking appropriate actions to ensure compliance under SMARA including the enforcement of reporting requirements under PRC Section 2207
- Submitting information to DMR pursuant to SMARA requirements
- Seizing financial assurances and completing reclamation after determining an operator's financial incapacity or abandonment of the operation

Vested Right to Mine

At the heart of SMARA is the requirement that every surface mining operation has a permit, a reclamation plan, and financial assurances to implement the planned

reclamation (PRC Section 2770(a)). However, operators of some surface mines in California have a “vested right” to mine pursuant to SMARA, which states:

No person who has obtained a vested right to conduct surface mining operations prior to January 1, 1976, shall be required to secure a permit pursuant to [SMARA] as long as the vested right continues and as long as no substantial changes are made in the operation except in accordance with [SMARA]. A person shall be deemed to have vested rights if, prior to January 1, 1976, the person has, in good faith and in reliance upon a permit or other authorization, if the permit or other authorization was required, diligently commenced surface mining operations and incurred substantial liabilities for work and materials necessary for the surface mining operations... (PRC Section 2776(a)).

A person with an existing surface mining operation who has vested rights pursuant to Section 2776 and who does not have an approved reclamation plan shall submit a reclamation plan to the lead agency not later than March 31, 1988. If a reclamation plan application is not on file by March 31, 1988, the continuation of the surface mining operation is prohibited until a reclamation plan is submitted to the lead agency... (PRC Section 2770(b)).

As shown in Table 2 (see Section II.C.1), one or more surface mines within the lead agency's jurisdiction has been noted to have a vested right that allows the designated mine to operate as provided below.

- The issuance of a mining permit or the recognition of a vested mining right lies with the local land-use decision making authority (the City).
- A determination of a vested right provides a substitute for a use permit and affects the evaluation of the operation under the CEQA.
- A reclamation plan, annual inspections, and financial assurances are required for all operations conducted after January 1, 1976, vested or not. The reclamation plan shall apply to operations conducted after January 1, 1976.
- In some circumstances, an expansion of the mining operation requires a permit and a CEQA review for the area outside of the existing vested right, and any amendment to the reclamation plan would require CEQA review.

Reclamation Plan (RP)

RPs and RP amendments that meet minimum SMARA requirements provide a foundation for the lead agency's regulation of ongoing mining operations. Lead agencies are required to:

- Review, analyze, and certify RPs as complete and in compliance with SMARA
- Submit RPs and RP amendments to DMR for review prior to approval
- Respond to any DMR comments
- Provide a 30-day notice of the approval hearing
- Provide a final response to DMR comments after the approval
- File the approval of the RP with the County Recorder

Financial Assurance

RPs also provide a basis for the calculation of the Financial Assurance Cost Estimate (FACE). Any adjustments to the cost estimate for reclamation must be reflected in the Financial Assurance Mechanism (FAM) for the surface mining operation. The FAM must always remain at least equal to the annually approved FACE. The lead agency must:

- Review on an annual basis the FACE, based on the RP and site conditions to ensure that it is adequate to complete reclamation so as to reduce potential liability to local or state government
- Adjust the FACE if necessary, to reflect, among other considerations, the expansion or a decrease in mining disturbances
- Submit to DMR a determination that the FACE submitted for comment is adequate, complete, and consistent with PRC Section 2773.1, Title 14, California Code of Regulations (CCR) Section 3800, and the State Mining and Geology Board (SMGB) Financial Assurance Guidelines
- Respond to any comments from DMR
- Approve the FACE following receipt of DMR input as adequate to complete reclamation between each inspection (see below) and FACE review/approval cycle

The requirements for responding to DMR comments, notices of public hearings, and final responses to comments are generally the same as for RPs, described above, except there is no requirement to file the approved FACE with the County Recorder. The requirements for the FACE review process are found in PRC Section 2773.4.

Annual Inspection, Inspection Notice, and Notice of Completion of Inspection

Annual inspections help to ensure SMARA compliance and that specific deviations from the approved RP are identified and handled timely and appropriately. Lead agencies must:

- Conduct annual inspections to ensure compliance with SMARA and the mining operation's RP
- Document mine conditions in Inspection Reports (IR) and Inspection Notices (IN; now referred to as a Notice of Completion of Inspection or "NOCI" under PRC Section 2774(b)(1))
- Submit both the IR and the IN/NOCI to DMR

3. Surface Mine Operator's Role

Under SMARA, surface mine operators must:

- Prepare RPs and RP amendments, including interim management plans, that meet minimum SMARA requirements
- Maintain their surface mining operation in compliance with SMARA, the approved RP, permit conditions related to reclamation, conditions of approval,

and minimal acceptable practices for reclamation pursuant to 14 CCR Section 3503

- Comply with annual reporting and reporting fee provisions pursuant to PRC Section 2207. This includes the submission of an Annual Report (AR) to DMR noting specific operational aspects for the previous calendar year with the report due on July 1 of each year along with the required fee
- Prepare and submit to the lead agency, annually, a FACE that meets minimum SMARA requirements pursuant to PRC Section 2773.1
- Maintain a FAM in an amount equal to or greater than the approved FACE

4. Division of Mine Reclamation's Role

The DMR was created to provide backstop to enforcement, provide oversight of operators, and assist and provide document review for local governments that administer SMARA within their respective jurisdictions. The primary focus of DMR is on existing surface mining operations and the return of those mined lands to a usable and safe condition. Among other responsibilities, DMR reviews and comments on proposed RPs, RP amendments, and FACEs received from the lead agency after the lead agency certifies these documents are complete and compliant with SMARA. DMR also processes mining operators' ARs and fees as required in PRC Section 2207. If necessary, DMR initiates compliance actions that encourage SMARA compliance. Legacy abandoned mines (prior to 1976) are addressed through DMR's Abandoned Mine Lands Unit.

C. Lead Agency Review and Assistance Program

1. Background

The LARA Program was developed following extensive input from lead agencies and other stakeholders. In December 2015 and January 2016, DMR held stakeholder workshops in four cities—Redding, San Luis Obispo, Santa Ana, and Sacramento—that provided an overview of the proposed LARA Program. Comments received during the workshops influenced final development of the LARA Program and the LARA Guidelines (<https://www.conservation.ca.gov/dmr/SMARA%20Mines/Documents/LARA%20Guidelines-%20ADA%20Compliant.pdf>).

2. Program Goal

The goal of the LARA Program is to assist local agencies in effective administration of SMARA through vetted reclamation plans, comprehensive annual mine inspections, and rigorously reviewed cost estimates in addition to uniform application of mining laws and regulations throughout California.

3. Legislative Amendments Since 2016

Recent amendments to SMARA are reflected in LARA Program implementation where applicable (see Attachment C for summary of new legislation). The LARA Program

review period for this Report covers the City of Palmdale's administration of SMARA between 2014 and 2018; therefore, any statutory amendments that occurred in 2016 went in to effect in 2017, and do not apply to review years 2014 through 2016.

D. City of Palmdale

1. General Plan and Surface Mining Ordinance

General Plan

The City of Palmdale's General Plan is intended to fulfill State requirements for comprehensive, long-term planning for the physical development of the City. The City's General Plan (posted at <https://www.cityofpalmdale.org/279/General-Plan>) contains information that pertains to SMARA implementation (and hence the LARA Program review). This material occurs in multiple locations including the Implementation and the Goals, Objectives and Policies sections. These sections of the General Plan present a general discussion of the mineral resources located within the City and lists the goals, policies, and programs that apply.

Surface Mining Ordinance

The City of Palmdale's Zoning Ordinance constitutes the comprehensive zoning regulations in relation to SMARA. On January 20, 1994, the SMGB certified the City of Palmdale's mining ordinance under Resolution number 94-54, Ordinance number 1023. The City of Palmdale's ordinance is posted at <https://www.conservation.ca.gov/smgb/reports/Documents/Ordinances-City/Palmdale.pdf>.

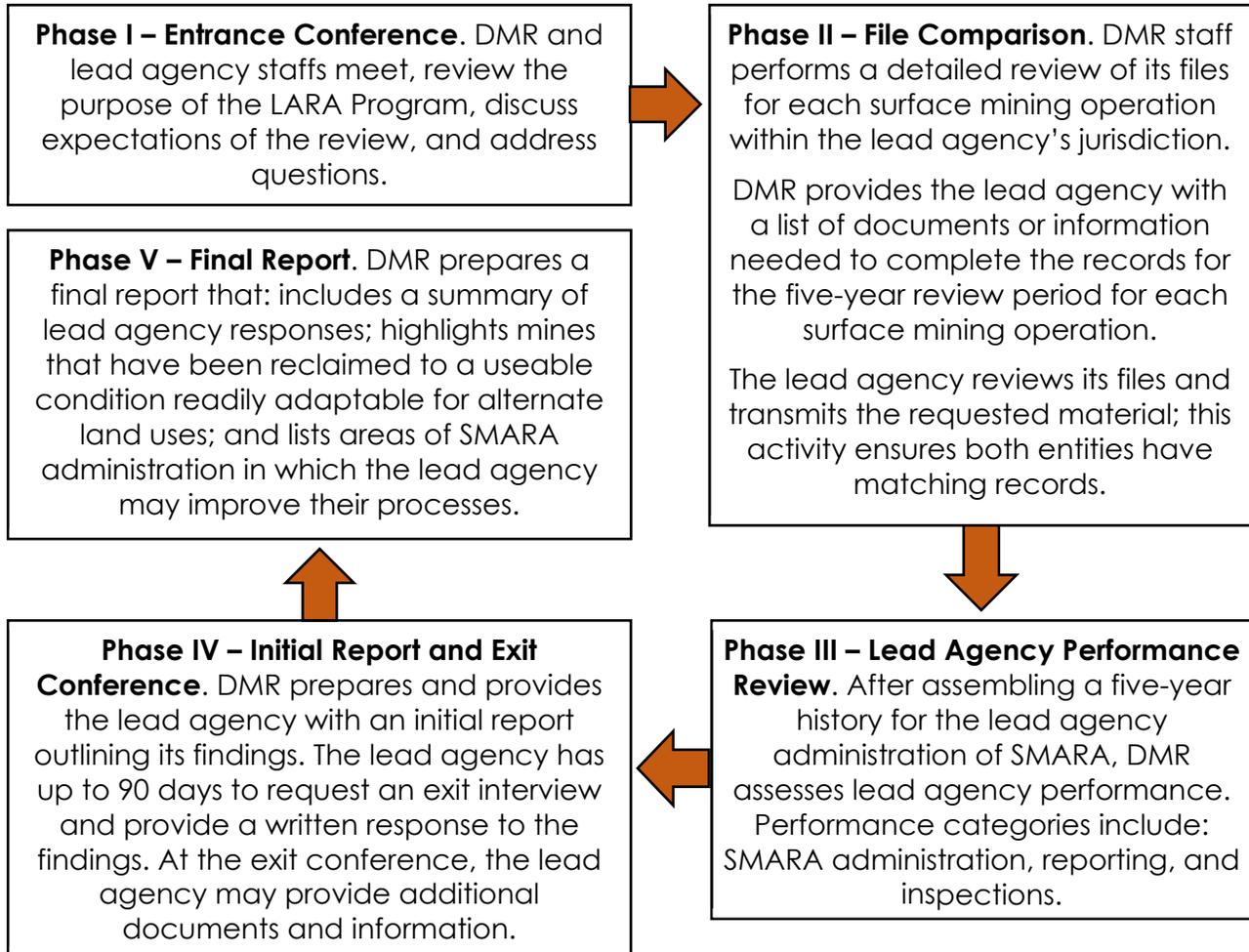
2. Surface Mining Administrative Review Procedures

The City of Palmdale's Municipal Code, Title 17 (Zoning), Chapter 17.102 provides information on Surface Mining and Reclamation procedures used within the City's jurisdiction and is posted at <https://www.codepublishing.com/CA/Palmdale/#!/Palmdale17/Palmdale17102.html#1>

II. LEAD AGENCY REVIEW AND ASSISTANCE PROGRAM REVIEW ACTIVITIES

The LARA Program review process consists of the five phases identified in Figure 2.

Figure 2. LARA Program Review Process Flowchart



A. Phase I: Entrance Conference

On June 29, 2017, DMR and City staffs held an introductory meeting (Entrance Conference). The purpose of the meeting was to introduce staffs of the City and DMR, provide an overview of the LARA Program, discuss the LARA Program review and mutual expectations, and answer any questions. Meeting participants were:

City of Palmdale

- Mark Oyler, Economic, and Community Development Director
- Robert Bruce, Planning Manager
- Megan Taggart, Senior Planner
- Matthew Alcuran, Assistant Planner
- Jeff Jenson, Public Works Inspector

Division of Mine Reclamation

- Pat Perez, Supervisor of Mine Reclamation
- Bret Koehler, Engineering Geologist
- Connie Spade, Associate Environmental Planner

Current DMR and City contacts are listed in Attachment E.

B. Phase II: File Comparison

The DMR staff inventoried the contents of its mine files for all eight existing surface mining operations subject to SMARA within the City's jurisdiction and within the review period (Table 1 and Figure 1 above identify the existing surface mining operations in the City). To ensure that both the City's and DMR's files contained the same operative documents as well as routine and non-routine submittals for each mining operation: (1) DMR staff requested from the City any documents missing from DMR's files; and (2) City staff responded by providing some of the missing documents.

Examples of non-routine submittals and supporting documents include:

- Current approved RP (as amended, if applicable)
- Current approved Conditional Use Permit (CUP) and Conditions of Approval
- Comment letters from DMR regarding a RP or RP amendment
- Documents certifying RPs and RP amendments as complete and ready for review
- Response letters from the City (if DMR commented on a document)
- City hearing notices
- Final responses to comments (if DMR commented on a document)
- Any documents related to compliance actions during the review period

Examples of annual routine submittals include:

- Operator's AR and fee payment
- FACE with the associated Statement of Adequacy (SOA) and responses to any DMR comment letters
- FAM
- IR with the associated IN or NOCI

C. Phase III: Performance Review

1. Reclamation Plans and Amendments, Permits, and Compliance Actions

SMARA Section 2770 requires that a person shall not conduct surface mining operations unless a permit is obtained from, a RP has been submitted to and approved by, and financial assurances for reclamation have been approved by the lead agency for the operation. No RP amendments or permit modifications were submitted during the review period. Also, during the review period, one compliance action was taken. Attachment A provides a detailed chronology for the LARA Program review period for each mine's SMARA-related activities. Table 2 details the permits and reclamation plans for the surface mining operations within the jurisdiction of this lead agency.

Table 2. Surface Mining Operation Permits and Reclamation Plans¹

Mine ID # / Name	Initial Mining Activity	Current Permit & Date	Permit Expires	Initial RP Date	Current RP & Date	RP Expires
19-0001 / Holliday Rock	1950s	CUP 96-4; 3/4/1999	none ²	1988	RP 96-1; 3/4/1999	7/2029
19-0002 / Antelope Valley Quarry and Plant	1952	CUP13-020; 10/21/2014	2020	~1980	RP 89-1; 5/3/1990	2020
19-0008 / Littlerock Quarry	1987	CUP 10-18 ⁴ ; 7/14/2011	2064	7/1/1987	RP 87-1 ⁴ ; 9/1/2011	2064
19-0020 / Palmdale	10/27/1986	CUP 08-01; 5/2/2008	2035	10/27/1986	RP 08-01; 5/2/2008	2035
19-0026 / Hi-Grade Materials Co.	prior to 2000	CUP 02-06; 12/2/2004	2020	prior to 2000	RP 02-01; 12/14/2005	2020
19-0033 / Robertson's Ready Mix	Known active since 1955	CUP 05-22; 12/9/2010	2027	-	RP 90-1; 12/16/1993	2027
19-0040 / Lane Quarry	1920 ³	NA	-	-	98-1; 5/20/1999	2029
19-0049 / 75th Street Quarry	2009	CUP 08-08; 6/9/2009	2029	2009	RP 08-1; 6/9/2009	2029

Abbreviations: CUP = Conditional Use Permit; NA = not applicable; RP = Reclamation Plan

Notes:

- ¹ Table prepared using multiple sources of information including CUPs, RPs, Inspection Reports, and environmental documents
- ² Provided that mining activities do not stop for over 180 days
- ³ Right to mine "grandfathered" in when City annexed the area
- ⁴ Also referred to as Site Plan and RP 6-87-7

2. Financial Assurances

Financial assurances under SMARA consist of the initial and annual FACE and FAM. Operators are required to submit their annual FACE no later than 30 days after the annual inspection (SMARA Section 2773.4(d)(1)(A)). SMARA requires the lead agency to submit the FACE to DMR for review and comment together with a SOA. The FAM is required to be equal to or greater than the FACE. Prior to the 2016 changes to SMARA (effective January 1, 2017), lead agencies were required to: (1) respond if the DMR commented on a given FACE; (2) submit a notice of hearing on the FACE; and (3) provide a final response. Beginning in 2017, DMR under appropriate circumstances may appeal a lead agency's approval of a FACE to the SMGB.

Table 3 presents and compares FACE and FAM values for the City's active mining operations during the review period (2014-2018); a note of "inadequate" is shown if the FACE exceeded the FAM. A summary of the annual documents required by SMARA that were within DMR files or were provided by the lead agency is provided in Table 4.

Table 3. Financial Assurances (2014-2018)

Mine ID # / Name	FACE Date ¹	FACE Amount ¹	FAM Date	FAM Amount (from AR ²)	FAM/FACE Relationship ³
19-0001 / Holliday Rock	1/24/2014	\$270,207.00	2014	\$270,207.00	+
	1/28/2015	\$286,657.00	2015	\$286,657.00	+
	1/28/2016	\$293,490.00	2016	\$310,321.00	+
	-	-	2017	\$310,321.00	NC
	2/19/2018	\$365,602.24	2018	\$365,602.24	+
19-0002 / Antelope Valley Quarry and Plant	1/24/2014	\$223,974.00	2014	\$223,974.00	+
	1/28/2015	\$193,807.00	2015	\$193,807.00	+
	1/28/2016	\$208,440.00	2016	\$200,955.00	inadequate
	-	-	2017	\$200,955.00	NC
	2/19/2018	\$186,467.18	2018	\$186,467.18	+
19-0008 / Littlerock Quarry	7/7/2014	\$412,788.17	2014	\$390,052.00	inadequate
	7/7/2015	\$412,788.17	2015	\$401,557.87	inadequate
	6/2/2016	\$401,557.87	2016	\$401,557.87	+
	-	-	2017	\$401,557.87	NC
	6/12/2018	\$447,787.41	2018	\$401,557.87	inadequate
19-0020 / Palmdale	6/1/2014	\$1,652,284.00	2014	\$1,493,286.00	inadequate
	7/15/15	\$2,028,065.00	2015	\$1,493,286.00	inadequate
	7/24/2016	\$1,556,940.00	2016	\$1,493,286.00	inadequate
	7/24/2017	\$1,418,742.00	2017	\$1,493,286.00	+
	6/8/2018	\$1,443,137.00	2018	\$1,493,286.00	+

Table 3. Financial Assurances (2014-2018)

Mine ID # / Name	FACE Date ¹	FACE Amount ¹	FAM Date	FAM Amount (from AR ²)	FAM/FACE Relationship ³
19-0026 / Hi-Grade Materials Co.	5/20/2014	\$241,354.00	2014	\$241,359.00	+
	-	-	2015	\$241,359.00	NC
	-	-	2016	\$286,625.00	NC
	-	-	2017	\$20,041,359.00 ⁴	NC
	3/1/2019	\$277,613.53	2018	\$241,359.00	inadequate
19-0033 / Robertson's Ready Mix	6/1/2014	\$296,706.00	2014	\$296,706.00	+
	1/29/2015	\$296,706.00	2015	\$296,706.00	+
	6/1/2016	\$299,361.00	2016	\$296,706.00	inadequate
	6/1/2017	\$291,732.00	2017	\$296,706.00	+
	-	-	2018	\$296,706.00	NC
19-0040 / Lane Quarry	6/13/2014	\$15,722.90	2014	\$15,255.79	inadequate
	6/5/2015	\$15,367.63	2015	\$15,255.79	inadequate
	6/15/2016	\$15,395.95	2016	\$15,722.90	+
	6/10/2017	\$12,140.92	2017	\$15,334.88	+
	7/31/2018	\$14,620.92	2018	\$15,351.88	+
19-0049 / 75th Street Quarry	-	-	2014	\$59,655.75	NC
	2/21/2015	\$50,960.25	2015	\$50,960.25	+
	-	-	2016	\$50,960.25	NC
	-	-	2017	\$50,960.25	NC
	6/20/2018	\$26,520.00	2018	\$50,960.25	+

Abbreviations: + = FAM and FACE are at least equal; AR = Annual Report; FACE = Financial Assurance Cost Estimate; FAM = Financial Assurance Mechanism; NC = Not Calculated

Notes:

- ¹ The FACE values came from FACE documents that the City provided during (1) the annual review process or (2) the LARA Program document exchange phase. A cell with a dash in it (i.e., "-") indicates that a FACE was not received that year. The document date is the date on the document; it is not the date approved by the lead agency as the lead agency did not provide DMR with copies of an approved FACE.
- ² The FAM values reported above were obtained from the Annual Reports submitted by surface mine operators to DMR approximately six months after the reporting year for the following reasons: (1) the lead agency was unable to provide copies of the FAM documents for each mining operation upon request by DMR staff during Phase II of the LARA Program review (i.e., File Comparison); and (2) the Annual Reports consistently contained FAM information.
- ³ NC indicates that information was not submitted so a relationship could not be calculated.
- ⁴ Reported value, however it appears to contain extra zeros.

Table 4. Lead Agency Document Submittal Performance Summary (2014-2018)

Mine ID # / Name	IR ¹ (annual)	IN or NOCI	FACE	SOA	FACE Approval	Enforcement Actions
19-0001 / Holliday Rock	2/5	1/5	4/5	0/5	0/5	None
19-0002 / Antelope Valley Quarry and Plant	2/5	1/5	4/5	0/5	0/5	None
19-0008 / Littlerock Quarry	2/5	1/5	4/5	1/5	0/5	None
19-0020 / Palmdale	3/5	1/5	5/5	0/5	1/5	None
19-0026 / Hi-Grade Materials Co.	2/5	1/5	2/5	0/5	0/5	None
19-0033 / Robertson's Ready Mix	3/5	1/5	4/5	0/5	1/5	None
19-0040 / Lane Quarry	4/5	3/5	5/5	1/5	0/5	2014: Dirt placed on site without authorization or explanation. Property Manager responded.
19-0049 / 75th Street Quarry	2/5	0/5	2/5	0/5	0/5	None
Summary: # of Records Submitted	20/40	9/40	30/40	2/40	2/40	
Summary: % Submitted	50%	23%	75%	5%	5%	

Abbreviations: FACE = Financial Assurance Cost Estimate; IN = Inspection Notice; IR = Inspection Report; NOCI = Notice of Completion of Inspection; SOA = FACE Statement of Adequacy

Notes:

¹ To evaluate this field, DMR staff first looked for presence of a submitted IR; if that was not available, then DMR staff looked to the AR to determine if it was appended to this document.

3. Annual Inspection, Inspection Report (IR), Inspection Notice (IN or NOCI)

The City is required to inspect all mines annually (PRC Section 2774(b)). The City inspects the mines in its jurisdiction typically during June of each year. Table 4 above contains a Performance Summary for each of the eight mines within this jurisdiction. The City conducted 20 out of an expected 40 annual inspections (50 percent). The City transmitted to DMR nine out of 40 IN/NOCI during the review period (23 percent).

4. Annual Report (AR)²

Pursuant to PRC Section 2207, surface mine operators are required to submit ARs and pay a reporting fee to DMR. Mine operators also are required to send a copy of their AR to the lead agency. Annual reports include information about the mine's reporting status (active, idle, under reclamation or reclaimed), disturbed and reclaimed acreage amounts, and production during the previous year. The operator submitted 100 percent of their ARs during the review period and fees were paid.

D. Phase IV: Initial Report

The Initial Report was transmitted to the City for review on December 26, 2019. The City requested an extension before the 90-day comment period ended. DMR provided the City a one-week extension ending on April 1, 2020. The City then requested an additional extension to April 6, 2020, which DMR also provided. The City provided written comments and additional documents to DMR to consider in preparation of the Final Report.

E. Phase V: Final Report

The Final Report was completed in May 2020. It was transmitted to the lead agency and posted to the DMR website.

1. Summary of Lead Agency Responses to the Initial Report

The City submitted additional documents to DMR to consider in preparation of the Final Report and provided informal comments to the Initial Report mostly pertaining to annual reports and current mine operators. Comments from the City staff and DMR staff responses to those comments are found in Attachment D.

2. Reclamation During Review Period

During the review period, no surface mining operations were reclaimed to a useable condition readily adaptable for alternate land uses pursuant to 14 CCR Section 3805.5.

3. Review of the Lead Agency's SMARA Administration

Section III presents the DMR staff's findings and recommendations to the lead agency.

² An AR is submitted by the mining operator, not the lead agency, and is, therefore, not directly covered in the LARA review. Information on ARs is presented here as it is part of SMARA implementation.

III. FINDINGS AND RECOMMENDATIONS TO LEAD AGENCY

Presented below are DMR staff's findings and recommendations to the lead agency following staff's review of the City's administration of the core requirements of SMARA during the LARA Program review period (2014-2018).

A. Reclamation Plans and Amendments, Permits, and Compliance Actions

1. **Finding #1.** The surface mining operations within the City's jurisdiction appear to: (1) be permitted or have rights to mine that were 'grandfathered' in when the mine was incorporated into City boundaries; and (2) have reclamation plans. However, the City did not provide copies of the current CUP or reclamation plan for the following mines upon request:

Missing Documents: Mine ID # / Name	CUP	Reclamation Plan
19-0008 (Littlerock Quarry)		x
19-0020 (Palmdale)	x	
19-0033 (Robertson's Ready Mix)		x
19-0049 (75 th Street Quarry)	x	x

Recommendation #1a. As a SMARA lead agency, the City must ensure that every surface mining operation within its jurisdiction complies with SMARA by having approved mining permits, approved reclamation plans, and adequate financial assurances (PRC Section 2770), unless excepted by SMARA.

Recommendation #1b. The City must establish and maintain in-house measures and procedures to ensure organized record-keeping and monitoring of surface mining reclamation under its jurisdiction. The lead agency shall forward a copy of each permit and approved reclamation plan and financial assurance instrument to the director of the Department of Conservation (14 CCR Section 3504). Additional documents that must be submitted to DMR include:

- Approved reclamation plans or plan amendments within 60 days of their approval
- Interim Management Plans at the time of approval
- FACEs within 30 days of their approval
- FAMs at the time of approval
- Notices of Violation at the time of issuance
- Stipulated Orders to Comply at the time of issuance
- Orders imposing an administrative penalty at the time of issuance
- Notices of completion of inspection including the completed inspection form at the time of issuance
- Permits at the time of approval

Additional documents that should be submitted to DMR include

- Administrative decision at the time of issuance following an appeal of an Order to Comply
- Notices to an operator of a violation or failure to comply with an Order to Comply or Stipulated Order to Comply
- Vested rights determinations

2. **Finding #2.** The City demonstrated 50 percent compliance over the review period for conducting required annual inspections (see Table 4). One compliance issue was reported during annual inspections. The property owner responded in a timely manner.

Recommendation #2. Implementation of annual inspections as required by SMARA provide a vehicle for assessing compliance and for initiating appropriate responses to non-compliance (e.g., enforcement action that could include a reclamation plan amendment). The City needs to cause annual inspections to occur (PRC Section 2774(b)(1)).

B. Processing of Financial Assurances

3. **Finding #3.** Lead agencies shall require financial assurance of each surface mining operation to ensure reclamation is performed in accordance with the surface mining operation's approved reclamation plan (PRC Section 2773.1(a)). As shown in Table 4, the City's review and submittal process for annual FACEs to DMR along with appropriate statement of adequacy did not comply with SMARA. For example:

- During the review period (2014-2018), the City had an overall 75 percent submittal rate for annual FACE documents.
- Only 5 percent of FACE transmittals to DMR included the required statement of adequacy as per 14 CCR Section 3805 (pre-2017) and PRC Section 2773.4(a)(2) (post-2017) (i.e., "... the lead agency shall provide ... a determination that the financial assurance cost estimated submitted is adequate, complete, and consistent with PRC Section 2773.1, Article 11... and the boards financial assurance guidelines...").
- During the review period (2014-2018), the City demonstrated a 5 percent notification of an approved FACE to DMR.
- Based on documents provided, the City did not follow the time requirements within SMARA. FACE submittal should follow annual inspection and should occur within the time period per PRC Section 2773.4(d).

Recommendation #3. Operator submittal and lead agency approval of FACEs must comply with PRC Sections 2773.1 and 2773.4. Specific to the City and focused on, post-2017 SMARA requirements:

- a. The City shall ensure that each surface mining operator submits a FACE annually for review, either:

- within 30 days of an annual inspection being conducted pursuant to Section 2774, an operator shall provide an annual financial assurance cost estimate to the lead agency for review (PRC Section 2773.4(d)(1)(A))
 - within 30 days of the applicable inspection date (i.e., a date requested by the operator pursuant to PRC Section 2207 or a date set by the lead agency pursuant to Section 2774(c)) should the lead agency fail to cause the inspection of the surface mining operation (PRC Section 2773.4(d)(1)(B))
- b. For FACE submittals to DMR and per PRC Section 2773.4(a)(2), the City's process must include a statement that the financial assurance cost estimate is "adequate, complete, and consistent with Section 2773.1 Article 11 (commencing with Section 3800) of Subchapter 1 of Chapter 8 of Division 2 of Title 14 of the California Code of Regulations" and the SMGB guidelines adopted pursuant to PRC Section 2773.1.
- c. Following approval, the City must provide copies of the FACE to DMR.
4. **Finding #4.** During the review period, the City did not ensure that the operator maintain adequate FAMs for all surface mining operations; for example, few FAMs submitted in accordance with SMARA or provided by the lead agency following DMR request were available for this LARA Program review; using the operators' annual reports for FAM values 48 percent of those values were equivalent or greater than the annual FACE during the review period (see Table 3).

Recommendation #4. The City must ensure that each surface mining operation has an adequate financial assurance mechanism to cover reclamation (PRC Sections 2736 and 2770).

C. Annual Inspections, Inspection Reports, and Inspection Notices

5. **Finding #5.** The City conducted 20 out of an expected 40 (50 percent) annual inspections as determined by submittal of the IRs (see Table 4).

Recommendation #5. In compliance with SMARA (PRC Section 2774(b)(1)), the City must:

- cause surface mining operations to be inspected in intervals of no more than 12 months
- provide a notice of completion of inspection to the supervisor [of DMR] within 90 days of conducting the inspection
- ensure that the notice contains a statement regarding the surface mining operation's compliance with SMARA and a copy of the completed inspection form
- specify, as applicable, all the following:

- (A) Aspects of the surface mining operation, if any, that were found to be inconsistent with this chapter but were corrected before the submission of the inspection form to the supervisor
- (B) Aspects of the surface mining operation, if any, that were found to be inconsistent with this chapter but were not corrected before the submission of the inspection form to the supervisor
- (C) A statement describing the lead agency's intended response to any aspects of the surface mining operation found to be inconsistent with this chapter but were not corrected before the submission of the inspection form to the supervisor
- (D) A statement as to whether the surface mining operation is out of compliance with an order to comply or stipulated order to comply issued by the lead agency

6. **Finding #6.** Few Inspection Notices/Notice of Completed Inspections (or transmittal letters that contained the information required on INs/NOICs) were discovered during the file review (23 percent; see Table 4).

Recommendation #6. The City must establish and maintain in-house measures and organized procedures to ensure record-keeping and monitoring of surface mining reclamation under its jurisdiction (14 CCR Section 3504). Additionally, see Recommendation 1b above.

D. General Findings and Recommendations

7. **Finding #7.** A general search of the City's website did not provide any guidance or information regarding how to obtain a mining permit, discretionary review process for surface mining and reclamation, and program compliance.

Recommendation #7. The City should provide resources on their website for surface mine operators or direct them to the DMR webpage for information on SMARA: <https://www.conservation.ca.gov/dmr>

8. **Finding #8.** The City has a mining ordinance certified by the SMGB per PRC Section 2774.5.

Recommendation #8. Per statute (PRC Section 2774(a)), the City must update its existing surface mining ordinance and submit the updated ordinance to the SMGB for certification to comply with SMARA. This would ensure that the ordinance is consistent with the recent changes to the SMARA statutes (see Attachment C).

IV. RESOURCES USED IN REPORT PREPARATION

A. City of Palmdale

1. The City of Palmdale, General Plan (available at <https://www.cityofpalmdale.org/279/General-Plan>)
2. The City of Palmdale, Ordinance No. 1023, an ordinance of the City of Palmdale amending Ordinance 140 (The Palmdale Zoning Ordinance) relating to (available at <https://www.conservation.ca.gov/smgb/reports/Documents/Ordinances-City/Palmdale.pdf>)
3. The City of Palmdale Municipal Code, Title 17 (Zoning), Chapter 17.102, Surface Mining and Reclamation (available at <https://www.codepublishing.com/CA/Palmdale/#!/Palmdale17/Palmdale17102.html#17.102>)

B. State of California

(See Attachment B.)

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ATTACHMENT A

SMARA-Related Chronologies for Each Mine for the LARA Review Period

- A1 — HOLLIDAY ROCK (19-0001) MINE CHRONOLOGY
- A2 — ANTELOPE VALLEY QUARRY AND PLANT (19-0002) MINE CHRONOLOGY
- A3 — LITTLEROCK QUARRY (19-0008) MINE CHRONOLOGY
- A4 — PALMDALE (19-0020) MINE CHRONOLOGY
- A5 — HI-GRADE MATERIALS CO. (19-0026) MINE CHRONOLOGY
- A6 — ROBERTSON'S READY MIX (19-0033) MINE CHRONOLOGY
- A7 — LANE QUARRY (19-0040) MINE CHRONOLOGY
- A8 — 75th STREET QUARRY (19-0049) MINE CHRONOLOGY

Abbreviations used in Attachment A:

- AR = Mining Operation Annual Report
- CUP = Conditional Use Permit
- DMR = Division of Mine Reclamation
- FACE = Financial Assurance Cost Estimate
- FAM = Financial Assurance Mechanism
- IN = Inspection Notice
- IR = Inspection Report
- NOCI = Notice of Completion of Inspection
- RP = Reclamation Plan
- RPA = Reclamation Plan Amendment
- SOA = FACE Statement of Adequacy

A1 – HOLLIDAY ROCK (19-0001) MINE CHRONOLOGY

DATE	Administrative Activity	RP/RPA	Permit	FACE	FAM	IR	IN or NOCI	Enforcement
Background Administrative Approvals								
1950	Initial mining approved by County of Los Angeles under special permit (No. 935)		X					
1988	RP 88-3 approved	X						
Current Permit Status/RP Status								
3/4/1999	RP 96-1 approved by Planning Commission	X						
3/4/1999	CUP 96-4 approved by Planning Commission		X					
6/2000	RP Amendment dated July 1, 1999; approved by Planning Department on June 2000; included Streambed Alteration Agreement (expired 12/31/1999)	X						
LARA Review Period (2014-2018)								
1/24/2014	FACE document; total estimated cost of reclamation calculated to be \$270,207.00			X				
3/5/2014	Lead Agency conducted inspection; no violations; IR signed 5/6/2014; DMR received on 1/29/2015					X		
3/20/2014	FAM agreement sent to Lead Agency and DMR; FAM amount of \$270,207.00; DMR received on 4/23/2014				X			
5/6/2014	IN prepared and sent to operator (and DMR) along with signed IR; DMR received on 1/29/2015						X	
12/10/2014	FAM agreement sent to Lead Agency and DMR; FAM amount of \$270,207.00; DMR received on 12/11/2014; Mine ID changed				X			
1/28/2015	FACE document; total estimated cost of reclamation calculated to be \$286,657.00; DMR received by 7/1/2015			X				
7/23/2015	FAM agreement sent to Lead Agency and DMR; FAM amount of \$286,657.00; DMR received on 8/3/2015				X			
1/28/2016	FACE document; total estimated cost of reclamation calculated to be \$293,490.00			X				
1/29/2016	Lead Agency conducted inspection; no violations; IR signed 1/29/2016					X		
2/19/2018	FACE document; total estimated cost of reclamation calculated to be \$365,602.24*			X				

* Denotes submitted by the Lead Agency on 4/7/2020, during commenting period for the LARA Program Initial Report; no transmittal letters were included with the FACE, so adequacy could not be determined; the documents have been accepted but not reviewed.

A2 – ANTELOPE VALLEY QUARRY AND PLANT (19-0002) MINE CHRONOLOGY

DATE	Administrative Activity	RP/RPA	Permit	FACE	FAM	IR	IN or NOCI	Enforcement
Background Administrative Approvals								
1952	Active mining at site since 1952							
Current Permit Status/RP Status								
5/3/1990	RP 89-1 approved	X						
10/9/2014	CUP 13-020 approved by Planning Commission at Public hearing (hearing continued from September 11, 2014); effective on 10/21/2014	X	X					
LARA Review Period (2014-2018)								
1/24/2014	FACE document; total estimated cost of reclamation calculated to be \$223,974			X				
3/5/2014	Lead Agency conducted inspection; no violations; IR signed 5/6/2014; DMR received on 1/29/2015					X		
3/20/2014	FAM agreement sent to Lead Agency and DMR; FAM amount of \$223,974; DMR received on 4/23/2014				X			
5/6/2014	IN prepared and sent to operator (and DMR) along with signed IR; DMR received on 1/29/2015						X	
10/9/2014	CUP 13-020 approved by Planning Commission at Public hearing (hearing continued from September 11, 2014); effective on 10/21/2014	X	X					
1/28/2015	FACE document. total estimated cost of reclamation calculated to be \$193,807; DMR received on 7/1/2015			X				
7/23/2015	FAM agreement sent to Lead Agency and DMR; FAM amount of \$193,807; DMR received on 8/3/2015				X			
1/28/2016	FACE document; total estimated cost of reclamation calculated to be \$208,440			X				
1/29/2016	Lead Agency conducted inspection; no violations; IR signed 1/29/2016					X		
2/19/2018	FACE document; total estimated cost of reclamation calculated to be \$186,467.18*			X				

* Denotes submitted by the Lead Agency on 4/7/2020, during commenting period for the LARA Program Initial Report; no transmittal letters were included with the FACE, so adequacy could not be determined; the documents have been accepted but not reviewed.

A3 – LITLEROCK QUARRY (19-0008) MINE CHRONOLOGY

DATE	Administrative Activity	RP/RPA	Permit	FACE	FAM	IR	IN or NOCI	Enforcement
Background Administrative Approvals								
8/20/1987	RP approved (6-87-7)	X						
9/1987	Surface mining began (6-87-7)		X					
Current Permit Status/RP Status								
7/14/2011	CUP 10-18 approved; proposed termination September 2064		X					
9/1/2011	RP Amendment; DMR received on 1/28/2013	X						
LARA Review Period (2014-2018)								
7/7/2014	FACE document; total estimated cost of reclamation calculated to be \$412,788.17; DMR received on 7/1/2015			X				
10/29/2014	Statement of Adequacy; Sent to DMR and DMR received on 10/29/2014; FACE document not included in e-file; assume SOA was for 7/7/2014 FACE			X				
7/7/2015	FACE document; total estimated cost of reclamation calculated to be \$412,788.17*			X				
6/2/2016	FACE document; total estimated cost of reclamation calculated to be \$401,557.87			X				
6/29/2016	Lead Agency conducted inspection; no violations; IR signed 6/29/2016					X		
5/16/2017	Lead Agency conducted inspection; no violations; IR signed 6/29/2017; DMR received on 7/24/2017					X		
7/24/2017	NOCI prepared and sent to operator (and DMR) along with signed IR; DMR received on 7/24/2017						X	
6/12/2018	FACE document; total estimated cost of reclamation calculated to be \$447,787.41*			X				

* Denotes submitted by the Lead Agency on 4/7/2020, during commenting period for the LARA Program Initial Report; no transmittal letters were included with the FACE, so adequacy could not be determined; the documents have been accepted but not reviewed.

A4 – PALMDALE (19-0020) MINE CHRONOLOGY

DATE	Administrative Activity	RP/RPA	Permit	FACE	FAM	IR	IN or NOCI	Enforcement
Background Administrative Approvals								
10/28/1986	RP (RP 08-01) approved; DMR stamped received 1988	X						
Current Permit Status/RP Status								
5/2/2008	RP Amendment; DMR notified Lead Agency on 10/8/2008 that its comments had been adequately addressed	X						
LARA Review Period (2014-2018)								
6/1/2014	FACE document; total cost of reclamation estimated to be \$1,652,284.00*			X				
7/15/15	FACE document; total cost of reclamation estimated to be \$2,028,065.00*			X				
1/29/2016	Lead Agency conducted inspection; no violations; IR signed 6/28/2016; DMR received on 6/30/2017					X		
7/24/2016	FACE document; total cost of reclamation estimated to be \$1,556,940.00*			X				
6/6/2017	Lead Agency conducted inspection; no violations; IR signed 6/7/2017; DMR received on 7/24/2017					X		
6/30/2017	FACE document; total estimated cost of reclamation calculated to be \$1,418,742.00; DMR received on 7/24/2017			X				
7/12/2017	Email from Lead Agency approving FACE (dated 6/30/2017); sent to DMR on 7/24/2019			X				
7/24/2017	DMR received approved FACE (dated 6/30/2017)			X				
5/14/2018	Lead Agency conducted inspection; no violations; IR signed 6/18/2018; DMR received on 4/18/2019					X		
6/8/2018	FACE document; total estimated cost of reclamation calculated to be \$1,443,137.00			X				
4/18/2019	NOCI prepared and sent to operator (and DMR) along with signed IR (5/14/2018); DMR received on 4/18/2019						X	

* Denotes submitted by the Lead Agency on 4/7/2020, during commenting period for the LARA Program Initial Report; no transmittal letters were included with the FACE, so adequacy could not be determined; the documents have been accepted but not reviewed.

A5 – HI-GRADE MATERIALS CO (19-0026) MINE CHRONOLOGY

DATE	Administrative Activity	RP/RPA	Permit	FACE	FAM	IR	IN or NOCI	Enforcement
Background Administrative Approvals								
12/2/2004	RP 02-01 approved	X						
Current Permit Status/RP Status								
12/2/2004	CUP 02-06 approved		X					
12/14/2005	RP Amendment; added acreage (108 acres) and combined RP and two separately permitted sites (19-0026 and 19-0031); clarified intended uses of site and limits of mining and extent of reclamation	X						
LARA Review Period (2014-2018)								
5/13/2014	Lead Agency conducted inspection; no violations; IR signed 6/15/2014; DMR received on 6/26/2015					X		
5/20/2014	FACE document; total estimated cost of reclamation calculated to be \$241,354.00; DMR received on 6/12/2014			X				
6/16/2014	IN prepared and sent to operator (and DMR) along with signed IR (for 5/13/2014); DMR received on 6/12/2014						X	
6/17/2014	FAM agreement amendment sent to Lead Agency and DMR; FAM amount of \$241,359.00; DMR received on 6/26/2015				X			
1/29/2016	Lead Agency conducted inspection; no violations; IR signed 6/15/2014					X		
3/1/2019	Revised 2018 FACE document; total estimated cost of reclamation calculated to be \$277,613.53*			X				

* Denotes submitted by the Lead Agency on 4/7/2020, during commenting period for the LARA Program Initial Report; no transmittal letters were included with the FACE, so adequacy could not be determined; the documents have been accepted but not reviewed.

A6 – ROBERTSON'S READY MIX (19-0033) MINE CHRONOLOGY

DATE	Administrative Activity	RP/RPA	Permit	FACE	FAM	IR	IN or NOCI	Enforcement
Background Administrative Approvals								
1965	Mining use existed within County of Los Angeles since 1965		X					
Current Permit Status/RP Status								
12/16/1993	RP 90-1 approved	X						
12/9/2010	CUP 05-22 approved		X					
LARA Review Period (2014-2018)								
6/1/2014	FACE document; total estimated cost of reclamation calculated to be \$296,706.00; DMR received on 6/12/2014			X				
6/2/2014	Lead Agency conducted inspection; no violations; IR signed 6/15/2014; DMR received on 6/29/2015					X		
6/16/2014	IN prepared and sent to operator (and DMR) along with signed IR; DMR received on 6/29/2015						X	
6/16/2014	FAM agreement sent to Lead Agency and DMR; FAM amount of \$296,706.00				X			
1/29/2015	FACE document; total estimated cost of reclamation calculated to be \$296,706.00; DMR received on 1/29/2015			X				
6/1/2016	FACE document; total estimated cost of reclamation calculated to be \$299,361.00*			X				
6/8/2016	Lead Agency conducted inspection; no violations; IR was unsigned; DMR received on 6/30/2017					X		
6/20/2017	Lead Agency conducted inspection; no violations; IR signed 6/20/2017; DMR received on 8/14/2017					X		
6/1/2017	FACE document; total estimated cost of reclamation calculated to be \$291,732.00; DMR received on 8/14/2017			X				
8/14/2017	Email from Lead Agency approving FACE (6/1/2017); sent to DMR on 8/14/2017			X				

* Denotes submitted by the Lead Agency on 4/7/2020, during commenting period for the LARA Program Initial Report; no transmittal letters were included with the FACE, so adequacy could not be determined; the documents have been accepted but not reviewed.

A7 – LANE QUARRY (19-0040) MINE CHRONOLOGY

DATE	Administrative Activity	RP/RPA	Permit	FACE	FAM	IR	IN or NOCI	Enforcement
Background Administrative Approvals								
1920	Quarry has been in use since 1920s; mining "grandfathered" in; area annexed into City in 1988							
Current Permit Status/RP Status								
5/20/1999	RP approved by Planning Commission (Resolution: PC-1999-024; Case 98-1)	X						
LARA Review Period (2014-2018)								
4/7/2014	Lead Agency conducted inspection; one violation: non-approved import of stockpiles; IR signed 6/30/2014; DMR received on 7/16/2014					X		X
6/9/2014	Response from Operator to Lead Agency on request to address violation of importing dirt onto the site of the Lane Quarry included in 2013 Annual Report (prepared and dated 6/25/2014)							Resolved
6/13/2014	FACE document; total estimated cost of reclamation calculated to be \$15,722.90; DMR received on 10/29/2014			X				
7/7/2014	IN prepared and sent to operator (and DMR) along with signed IR						X	
10/29/2014	Statement of Adequacy; sent to DMR and DMR received on 10/29/2014; FACE document not included in e-file; assume SOA was for 7/7/2014 FACE			X				
6/5/2015	FACE document; total estimated cost of reclamation was calculated to be \$15,367.63; DMR received on 6/29/2015			X				
6/17/2015	FAM agreement sent to Lead Agency; FAM amount of \$15,287.56; DMR received on 6/29/2015				X			
6/9/2016	Lead Agency conducted inspection; no new violations; IR signed 6/29/2016; DMR received on 7/1/2016;					X		
6/13/2016	FAM agreement sent to Lead Agency; FAM amount of \$15,302.90				X			
6/15/2016	FACE document; total estimated cost of reclamation calculated to be \$15,395.95; DMR received on 7/1/2016			X				

A7 – LANE QUARRY (19-0040) MINE CHRONOLOGY, continued

DATE	Administrative Activity	RP/RPA	Permit	FACE	FAM	IR	IN or NOCI	Enforcement
LARA Review Period (2014-2018)								
6/10/2017	FACE document; total estimated cost of reclamation calculated to be \$12,140.92			X				
6/13/2017	Lead Agency conducted inspection; no new violations; IR signed 6/14/2017; DMR received on 7/3/2017					X		
6/15/2017	FAM agreement sent to Lead Agency; FAM amount of \$15,302.90				X			
6/29/2017	NOCI prepared and sent to operator (and DMR) along with signed IR (6/13/2017); DMR received on 7/3/2017						X	
5/8/2018	Lead Agency conducted inspection; no new violations; IR signed 6/11/2018; DMR received on 1/30/2019					X		
6/26/2018	FAM agreement sent to Lead Agency; FAM amount of \$15,334.88; DMR received on 7/3/2018				X			
7/31/2018	FACE document; total estimated cost of reclamation calculated to be \$14,620.92*			X				
1/29/2019	NOCI prepared and sent to DMR along with signed IR (5/8/2018); DMR received on 1/30/2019						X	

* Denotes submitted by the Lead Agency on 4/7/2020, during commenting period for the LARA Program Initial Report; no transmittal letters were included with the FACE, so adequacy could not be determined; the documents have been accepted but not reviewed.

A8 – 75th STREET QUARRY (19-0049) MINE CHRONOLOGY

DATE	Administrative Activity	RP/RPA	Permit	FACE	FAM	IR	IN or NOCI	Enforcement
Background Administrative Approvals								
2009	New mine							
Current Permit Status/RP Status								
6/9/2009	CUP 08-08 approved by Planning Commission		X					
8/13/2009	RP 08-01 approved by Planning Commission	X						
LARA Review Period (2014-2018)								
2/21/2015	FACE document; total estimated cost of reclamation calculated to be \$50,960.25			X				
6/27/2017	Lead Agency conducted inspection; no violations; IR signed 6/28/2017					X		
5/8/2018	Lead Agency conducted inspection; no violations; IR unsigned					X		
6/20/2018	FACE document; total estimated cost of reclamation calculated to be \$26,520.00			X				

ATTACHMENT B

Resources Available to Lead Agencies (as of May 2020)

LEAD AGENCY REVIEW AND ASSISTANCE (LARA) PROGRAM WEB FILES

- California Department of Conservation Division of Mine Reclamation webpage:
<https://www.conservation.ca.gov/dmr>
- Information on the LARA Program, including final LARA reports:
<https://www.conservation.ca.gov/dmr/SMARA%20Mines/Pages/LeadAgencyReview.aspx>
- Access to the LARA Program Review Process Guidelines:
<https://www.conservation.ca.gov/dmr/SMARA%20Mines/Documents/LARA%20Guidelines-%20ADA%20Compliant.pdf>
- California Department of Conservation State Mining and Geology Board Financial Assurances guidelines:
<http://www.conservation.ca.gov/smgf/Guidelines/Pages/Appendices.aspx>

Resources Available to Lead Agencies (continued)

SURFACE MINING AND RECLAMATION ACT OF 1975 (SMARA)

Statute

- California Public Resources Code and California Code of Regulations for SMARA: <https://www.conservation.ca.gov/smgb/Regulations/Documents/DMR-SR-1-Jan-2019.pdf>

Rulemaking Updates

- To be alerted to proposed regulatory changes to SMARA, sign up through the Department's website at: <https://www.conservation.ca.gov/smgb/Pages/Rulemaking/Overview.aspx>

SMARA Inspection Workshops

- The Division's SMARA Inspector Training Workshops and the Inspection Guidance Document, as required under PRC Section 2774(e): https://www.conservation.ca.gov/dmr/workshops/Pages/current_schedule.aspx

Division Points of Contact

- The Division has staff available to assist lead agencies in the Reporting Unit, Engineering Geology Unit, and Environmental Services Unit. An organization chart can be found on the DMR website at: <https://www.conservation.ca.gov/dmr>

Reclamation Plan Review and Approval

- Additional resources can be found on the Division's website, including:
 - Checklist of Reclamation Plan Requirements
The checklist is organized by topic (i.e., geologic requirements, revegetation requirements, etc.
 - New online Annual Reporting System (including online Annual Report fee payment)
 - Annual Report form and instructions
 - Financial Assurance forms and instructions (FACE and FAMS)
 - Inspection Form and Notice of Completion of Inspection form

ATTACHMENT C

Lead Agency Review and Assistance (LARA) Program Recent Changes in Legislation (as of July 2018)

Senate Bill No. 854, Summary: *Published on June 27, 2018.*

- Establishes electric submittal of official copies of mining operational documents including reclamation plans, reclamation plan amendments, interim management plans, finance assurance documents, notices of violation, orders to comply, stipulated orders, orders imposing an administrative penalty, notices of completion of inspection, permits, vested rights determination and instructs DMR to post these documents on their website.

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB854

Senate Bill No. 809, Summary: *Published on October 5, 2017.*

- Transfers various duties assigned to the Director of Conservation to the Supervisor of Mine Reclamation, as specified, and transfers various duties assigned to the Department of Conservation to the Division of Mine Reclamation (DMR), as specified.

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB809

Senate Bill No. 209, Summary: *Published April 18, 2016.*

- Establishes the DMR within the Department of Conservation under the direction of the Supervisor of Mine Reclamation.
- Raises the amount of the annual reporting fee to \$10,000 per mining operation and raises the maximum amount of the total revenue generated from the reporting fee to \$8,000,000.
- Provides for an operator (after the State Mining and Geology Board (SMGB) has adopted specified regulation) to include a corporate financial test in a Financial Assurance Mechanism.

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB209

Assembly Bill No. 1142, Summary: *Published on April 18, 2016.*

- Requires reclamation plans filed by an operator of a mining operation with a lead agency include specified reclamation maps; requires a lead agency when submitting a proposed reclamation plan to DMR to incorporate specified items of information and documents in the submitted reclamation plan within certain timeframes; requires certain actions be taken by DMR upon receiving a proposed reclamation plan.

- Requires operator to replace an approved financial assurance only if the financial assurance cost estimate (FACE) identifies a need to increase the amount of the financial assurance; requires a lead agency to submit the FACE for a surface mining operation to DMR for review as specified and requires DMR to take certain actions upon receiving a FACE.
- Requires a lead agency or the SMGB to conduct a specified public hearing if the lead agency has evidence that an operator maybe financially incapable of performing reclamation in accordance with its approved reclamation plan or that the operator has abandoned a surface mining operation without completing reclamation and to take appropriate actions to forfeit the operator's financial assurances.
- Authorizes a lead agency employee conducting mine inspections to have met specified criteria, including having completed mine inspection workshop (by January 1, 2020).
- Imposes new requirements on the lead agency related to the timing of mine inspections.
- Authorizes DMR to establish a training program for lead agency employees who inspect surface mining operations no later than December 31, 2017.
- Lays out process for enforcement actions.

https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201520160AB1142

ATTACHMENT D

City of Palmdale Staff Comments on Initial Report and Division of Mine Reclamation Staff Responses

D1 — City of Palmdale Staff Comments on Initial Report

D2 — Division of Mine Reclamation Staff Responses to City of Palmdale Staff
Letter

ATTACHMENT D1

City of Palmdale Staff Comments on Initial Report



PALMDALE
a place to call home

April 6, 2020

STEVEN D. HOFBAUER
Mayor

RICHARD J. LOA
Mayor Pro Tem

LAURA BETTENCOURT
Councilmember

AUSTIN BISHOP
Councilmember

JUAN CARRILLO
Councilmember

38300 Sierra Highway

Palmdale, CA 93550-4798

Tel: 661/267-5200

Fax: 661/267-5233

TDD: 661/267-5167

Auxiliary aids provided for

communication accessibility

upon 72 hours notice and request.

Ms. Carol Atkins
Division of Mine Reclamation
801 K Street, MS 09-09
Sacramento, CA 95814

RE: REVIEW OF THE DRAFT LEAD AGENCY REVIEW AND ASSISTANCE PROGRAM INITIAL REPORT PREPARED FOR THE CITY OF PALMDALE

Dear Ms. Atkins:

Thank you for submitting the above-referenced document. The City of Palmdale appreciates the opportunity to review the document and provide comments. After review, staff has minor comments on the Draft Lead Agency Review and Assistance (LARA) document which have been attached.

If you have any questions, please contact Associate Planner Justin Sauder at jsauder@cityofpalmdale.org or (661) 267-5372.

Sincerely,

Carlene Saxton
Acting Planning Manager

Enclosure

cc: Acting Director of Economic and
Community Development Michael 'Mike' Behen
Economic Development Manager Luis Garibay

Attachment:

1. CD with FACE Documents

www.cityofpalmdale.org

Letter to Ms. Atkins
 LARA Review
 April 6, 2020
 Page 2

PAGE/EXHIBIT	COMMENT	1
General	"Littlerock Quarry" (19-0008) should be changed to "Granite Construction Company" throughout "Palmdale Quarry" (19-0020) should be changed to "Vulcan Materials Company" throughout "75th Street Quarry" (19-0049) should be changed to "JV Aggregate" throughout	
Surface Mining Administrative Review Procedures		
Page 7	What is SMARA asking for here? Administrative review of new RP's? The PMC has a section on reclamation plans, is that sufficient?	2
General	It should be noted that AV Quarry and Plant is now operated by Holiday Rock.	3
Table 3: Financial Assurances (20104-2018)		
Page 11	We have provided the FACE documents for a lot of these missing dates (see attached CD). We are unsure if the documents we do have are complete or have been approved but it may help to at least fill in the blanks for some of these missing numbers.	4
Page 11	The FACE documents for Holiday Rock and AV Quarry and Plant for 2018 are attached (see CD).	5
	The FACE documents for Granite Construction (Littlerock Quarry) for 2015 and 2018 are attached (see CD). The 2017 FACE document was submitted in excel format but the total estimated cost of reclamation was \$394,364.15 (see CD).	6
	The FACE documents for Vulcan Materials (Palmdale) for 2014-2016 are attached (see CD).	7
Page12	The FACE documents for Hi-Grade for 2014 and 2018 are attached (see CD).	8
	The FACE document for 2016 for Robertson's is attached (see CD), but we do not have the 2018 FACE document.	9
	The FACE document for 2018 for Lane Quarry is attached (see CD).	10

Letter to Ms. Atkins
 LARA Review
 April 6, 2020
 Page 3

	The FACE document for 2018 for JV Aggregate (75th Street Quarry) is attached (see CD), but we do not have the FACE documents for 2014, 2016 or 2017.	11
	Table 4: Lead Agency Documented Submittal Performance Summary (214-2018)	
Page 13	Some numbers in the table may change based on the FACE documents to be provided	12
	Annual Report (AR)³	
Page 14	Staff does not know how many annual reports DMR received during the review period. Wouldn't DMR have access to this information?	13
	Finding #1	
Page 15	We have CUP's and Reclamation Plans for each of these mines as shown in Table 2 on Page 10, but if you do not have copies let us know and we can provide.	14
	Finding #7	
Page 18	Would DMR have access to the percentage of annual reports submitted during the review period? From Table 3 it appears that all but three annual reports were submitted. It appears that the reports from 2018 for Robertson's (19-0033), Lane Quarry (19-0040) and 75th Street (19-049) are missing.	15
	Finding #8	
Page 18	We have limited information about mining operations, but it can be found in Palmdale Municipal Code (PMC) Section 17.102 at www.cityofpalmdale.org .	16
	Finding #9	
Page 18	We are processing zoning ordinance amendments throughout the year and we are hoping to update the mining and reclamation section to be in compliance with SMARA.	17

ATTACHMENT D2

Division of Mine Reclamation Staff Responses to the City of Palmdale Staff Letter

(Numbers correspond to the lined text in the City of Palmdale's letter.)

- 1. The City suggested that the following name changes should be made throughout the Report: (1) "Littlerock Quarry" (19-0008) to "Granite Construction Company;" (2) "Palmdale Quarry" (19-0020) to "Vulcan Materials Company;" and "75th Street Quarry" (19-0049) to "JV Aggregate"**

While performing this LARA Program review, DMR staff found that the names of the surface mining operations on SMARA documents included the name of the operator along with the name of the operation, or just the name of the operation, or just the name of the operator. As also noted in the City's comments, the operator for Antelope Valley Quarry and Plant (19-0002) has changed. Given this, DMR staff uses only the name for the mining operation for consistency in this Final Report.

- 2. The City noted that the Palmdale Municipal Code (PMC) covers Reclamation Plans.**

In general, the "Surface Mining Administrative Review Procedures" section of the Initial Report presents information on the lead agency's general plan, surface mining ordinance, and any additional surface mining administrative review procedures that the lead agency may have developed. Additional written administrative review procedures are not required, but when a lead agency has developed written procedures, they are presented in this section of the Report. The "Surface Mining Administrative Review Procedures" section of the Final Report has been updated to include the PMC along with the City's General Plan and Surface Mining Ordinance. The PMC contains written administrative procedures specific to implementation of their SMARA review process.

- 3. The City noted that Holliday Rock now operates the Antelope Valley Quarry and Plant (19-0002).**

Thank you for providing this information.

- 4. Financial Assurance Cost Estimate (FACE) documents were submitted that the Initial Report noted as missing. The City was unsure if the documents submitted were complete or if they had been approved.**

Thank you for providing this information. DMR staff considered all newly-submitted documents while preparing this Final Report.

- 5. FACE documents for Holliday Rock (19-0001) and Antelope Valley Quarry and Plant (19-0002) for 2018 were submitted.**

Thank you. DMR staff considered these documents while preparing the Final Report.

- 6. FACE documents for Littlerock Quarry (19-0008) for 2015 and 2018 were submitted. Additionally, the 2017 FACE document was submitted as an Excel spreadsheet.**

Thank you. DMR staff considered these documents while preparing the Final Report.

- 7. FACE documents for Palmdale Quarry (19-0020) for 2014-2016 were submitted.**

Thank you. DMR staff considered these documents while preparing the Final Report.

- 8. FACE documents for Hi-Grade Materials Co. (19-0026) for 2014 and 2018 were submitted.**

Thank you. DMR staff considered these documents while preparing the Final Report.

- 9. The FACE document for Robertson's Ready Mix (19-0033) for 2016 was submitted. The City was unable to provide the 2018 FACE.**

Thank you. DMR staff considered the document while preparing the Final Report.

- 10. The FACE document for Lane Quarry (19-0040) for 2018 was submitted.**

Thank you. DMR staff considered the document while preparing the Final Report.

- 11. The FACE document for 75th Street Quarry (19-0049) for 2018 was submitted. The City has no record of FACE documents for 2014, 2016, and 2017 for this mine.**

Thank you. DMR staff considered the documents while preparing the Final Report.

- 12. On page 13, Table 4, FACE totals may change based on FACE documents provided.**

Table 4 has been updated to include the information submitted.

- 13. The City staff is unsure how many annual reports DMR received during the review period (2014-2018) and asked if DMR had access to the information.**

The Initial Report included placeholder language (highlighted in yellow) for the percentage of annual report submittals from the surface mine operators (under SMARA, annual reports are submitted by operators, not lead agencies) during the review period, as some annual reports were under review. DMR staff has completed its review and the Final Report confirms the placeholder language, namely 100 percent submittal of annual reports during the review period.

- 14. Conditional use permits and reclamation plans for each for the mines as shown on page 10, Table 2, can be provided by the City upon request.**

Thank you for your comment. DMR staff has requested copies of the conditional use permits and reclamation plans outlined in Finding #1. DMR staff looks forward to receiving this information to complete its files. Section 3504 of 14 CCR requires that

the lead agency "forward a copy of each permit and approved reclamation plan ... to the Department of Conservation."

15. Would DMR staff have access to the percentage of annual reports submitted during the review period? From Page 18, Table 3 it appears that all but three annual reports were submitted. It appears that the reports from 2018 for Robertson's (19-0033), Lane Quarry (19-0040), and 75th Street (19-0049) are missing.

When the Initial Report was transmitted to the City, DMR staff was in the process of reviewing annual report submittals and updating DMR's administrative files, including the status of the 2018 Annual Report for the City. Review of this information is complete and DMR files have been updated. Additionally, Table 3 of the Final Report has been updated to include this information.

16. Limited information about mining operations can be found in PMC Section 17.102 at www.cityofpalmdale.org.

Thank you for the information. DMR staff has considered this information in preparation of this Final Report. The City should consider providing resources on their website regarding how to obtain a mining permit, discretionary review process of surface mining and reclamation, and program compliance.

17. The City is processing zoning ordinance amendments throughout the year and is hoping to update the mining and reclamation section for compliance with SMARA.

PRC Section 2774(a) states that the surface mining ordinance be "periodically reviewed by the lead agency and revised, as necessary, to ensure that the ordinances continue to be in accordance with state policy." Given the City's ordinance was adopted in 1994, it likely became outdated in 2006, when procedural changes to the approval of reclamation plans and financial assurances were made to SMARA.

DMR staff looks forward to the City updating its existing surface mining ordinance to include all amendments to SMARA and submitting the updated ordinance to the State Mining and Geology Board for certification to comply with SMARA.

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ATTACHMENT E

Lead Agency Review and Assistance Program Contacts (as of May 2020)

DIVISION OF MINE RECLAMATION

Main Phone Number: (916) 323-9198

Document Submittal Email: DMR-Submittals@conservation.ca.gov ³

Carina Grove
Environmental Scientist, Environmental Services Unit
(916) 324-0718
Carina.Grove@conservation.ca.gov

Carol E. Atkins
Manager, Environmental Services Unit
(916) 445-6175
Carol.Atkins@conservation.ca.gov

Cy R. Oggins
Manager, Reclamation and Remediation Unit
(916) 322-2229
Cy.Oggins@conservation.ca.gov

LEAD AGENCY

Main Phone Number: (661) 267-5100

Beginning December 2019
Megan Taggart
Senior Planner
(661) 267-5213
mtaggart@cityofpalmdale.org

Through November 2019
Matthew Alcuran
Assistant Planner

³ **UPDATED DOCUMENT SUBMITTAL PROCESS:** Documents normally submitted to the DMR through specific individuals shall be emailed to: DMR-Submittals@conservation.ca.gov starting December 2, 2019. Examples of documents commonly submitted by lead agencies to the DMR typically include: Notices of Completion of Inspection, Inspection Reports, Notices of Violation, Stipulated Orders to Comply, Orders to Comply, Financial Assurance Cost Estimates, Financial Assurance Mechanisms, Statements of Responsibility, Reclamation Plans, Responses to Comments, Notices of Intent to Approve Reclamation Plans, and Notices of Intent to Approve Financial Assurances.