

May 22, 2019

Jacqueline Onciano
Planning Director
Department of Planning and Development
County of Santa Clara
70 W. Hedding Street, 7th Floor
San Jose, CA 95110

Re: Permanente Quarry, Mine ID # 91-43-0004
Application for Reclamation Plan Amendment

Dear Ms. Onciano:

Lehigh Southwest Cement Company (Lehigh) is pleased to submit the attached application requesting Santa Clara County's approval of an amended reclamation plan. Our submittal provides the application information required by the County as well as supplemental information that was developed to assist in developing the best possible plans to the benefit of the site and the regional environment. We provide these technical and environmental evaluations as part of our nearly 2,500-page submittal to aid the County in its consideration of our application and in conducting environmental review.

The California Surface Mining and Reclamation Act (SMARA) encourages reclamation plans to be amended as mining progresses, conditions change, and better reclamation strategies are developed. Since 2012, Lehigh has invested considerable effort in assessing reserves and further planning for mining, reclamation, and closure. The results show that continued material extraction is available within the vested areas of Lehigh's property. Importantly, results of substantial hydrologic and geotechnical investigations that have occurred since 2012 are incorporated to this amendment and will result in more certainty with regard to water quality following closure and better slope stability of the North Quarry and ridgeline.

The primary purposes of the proposed amendment include:

Ongoing Materials Production with Economic and Environmental Benefits to the Region: The quarry is an important supply of cement-grade limestone and construction aggregates to local and regional markets. Permanente Quarry has been operating for more than a century and is one of only seven of the 1,100 active mines in California where the geologic resources occur in sufficient quality and quantity to produce high-quality Portland cement. Lehigh provides roughly 80 percent of the cement in the County and 50 percent in the San Francisco Bay Area. This unique local supply provides regional economic and environmental advantages by reducing travel time and vehicle miles traveled, which reduces air pollutants and greenhouse gas emissions.

Implementing the project will enable Lehigh to continue producing these important construction materials.

Improve North Quarry Highwall Stability and Ridgeline Appearance: The project will allow Lehigh to improve the aesthetic appearance and geotechnical stability of the Permanente Ridge and North Quarry. This will involve a marginal reduction in elevation along approximately 3,000 linear feet of the ridgeline to stabilize areas of erosion and improve the aesthetic quality of the existing unvegetated highwall. Without this component of the project, portions of the highwall would continue to locally erode and could destabilize portions of the ridgeline. In its existing condition, the highwall cannot be vegetated, and reconfiguring this portion of the highwall and ridgeline will enable Lehigh to revegetate the highwall benches and provide long-term protection of the ridgeline integrity. This component will require that the County Board of Supervisors consent to update the ridgeline easement agreement made between Lehigh's predecessor and the Board in 1972 to remedy the existing slide area and provide long-term stabilization of the ridgeline.

Ensuring Protection of Water Quality: The project is designed for water quality protection. The proposed reclamation plan amendment incorporates information from post-2012 studies and offers water quality-related improvements. Since 2012, additional studies have been conducted and a substantial amount of new data has been developed regarding material characteristics and hydrologic conditions at the quarry, including the underlying mechanisms for surface water and groundwater quality. Lehigh commissioned an expanded set of investigations to meet its sampling and reporting obligations under the County's 2012 conditions of approval and more-recent investigation requirements imposed by the San Francisco Bay Regional Water Quality Control Board (RWQCB) under Water Code Sections 13260 and 13267. The project provides greater protection to surface and groundwater quality by backfilling the North Quarry with non-limestone materials from on-site sources and using imported surplus construction soil from regional construction projects that meets site-specific acceptance criteria to protect water quality. Leaving the West Materials Storage Area largely in place rather than moving it in its entirety to backfill the North Quarry will prevent re-exposing limestone materials and placing these materials below future groundwater levels in the quarry. The amended reclamation strategy also incorporates guidance from the RWQCB that did not exist in 2012 and advances future closure plans required by the RWQCB under recent waste discharge requirements. Use of imported surplus construction soil is integral to the improved reclamation strategy and compliance with RWQCB requirements. Incidentally, this strategy will also provide a location for the beneficial reuse of surplus soil that will address a regional need for excess soil placement sites and reduce vehicle miles traveled, air pollutants, and greenhouse gas emissions on a regional scale.

The proposed reclamation plan amendment is a comprehensive update to the 2012 reclamation plan. The proposed reclamation plan incorporates current SMARA requirements, including those resulting from 2016 SMARA amendments, and modifies the approved reclamation plan consistent with the above purposes and objectives. The amended backfill plan would be superior to the approved plan and provide updated reclamation planning for continued mineral

production. None of the reclamation commitments made in the 2012 amended reclamation plan are lessened, and many aspects of reclamation, beyond those mentioned above, are improved.

Lehigh is committed to ensuring that our ongoing operations and the ultimate reclamation of this important site reflects our commitment to being a responsible operator and member of the community. Over the last several years, Lehigh has made substantial investments in water management, emissions controls, and sound monitoring and reduction. It is our intent to continue to be part of the fabric of Silicon Valley's development for years to come. We will continue our operations providing important construction materials to Northern California, and we will reclaim the Permanente Quarry site in an environmentally and socially responsible manner and continue listening to, and addressing, the concerns of our neighbors and community leaders.

Lehigh looks forward to coordination with County staff as staff processes this reclamation plan amendment. We are available to answer any questions and provide additional information if necessary. Please do not hesitate to contact me at 408-996-4269 ext. 106 if you have questions or comments during your review of our application.

Sincerely,



Erika Guerra
Environmental and Land Management Director
Lehigh Southwest Cement Company

Enclosures:

Environmental Information Form

Well Information Questionnaire

Hazardous Waste and Substance Sites List Questionnaire

Santa Clara County Planning Development Application

Binder 1: Permanente Quarry Amended Reclamation Plan

Binder 2: Project Description and Supplemental Environmental Information

Permanente Quarry Reclamation Plan Amendment Project Description

Supplemental Environmental Information:

Permanente Quarry Ridgeline Protection Easement Analysis

Suitable Surplus Soil Availability Study for Permanente Quarry

Permanente Quarry Reclamation Plan Amendment Aesthetics Technical Study

Air Quality Impact Assessment for the Permanente Quarry Reclamation Plan Amendment

Biological Resources Report Permanente Quarry Reclamation Amendment—Rock Plant Reserve Component

Biological Resources Report Permanente Quarry Reclamation Amendment—North Highwall Lay-Back Component

Archaeology Inventory Report Permanente Quarry Reclamation Plan Amendment—Rock Plant Reserve Component

Archaeology Inventory Report Permanente Quarry Reclamation Plan Amendment—North Highwall Lay-Back Component

Permanente Quarry Reclamation Plan Amendment Noise and Vibration Study

Permanente Quarry Soil Import Transportation Impact Analysis