

Seventh Day Adventist Reform Movement

Northern California Conference



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June 24, 2020

Amador County Planning Department
810 Court Street,
Jackson, CA 95642

RE: Pilgrim Rock Quarry Proposal
ATTN: Chuck Beatty

To Whom It May Concern,

We are writing in regards to the proposed Pilgrim Rock Quarry at 200 Highway 16, Plymouth. The SDARM Northern California Conference (NCC) is a non-profit religious organization and also the parent organization of Hope Foundation. As such, we own the church property neighboring the proposed quarry at 240 Highway 16. As you may be aware, our property contains residences, a church, a school, and a media recording studio.

When we were first informed of the proposed Pilgrim Rock Quarry project by R.A. Home Investments, we were assured that there would be no quarry or trucking activity on Saturdays, and therefore there would be no direct impact on the public church services held on our property every Saturday from around 9am until 2pm, sometimes later. However, as is stated on Page 4 of the *Air Quality and Greenhouse Gas Assessment*, "the mine would operate from 6:00 a.m. to 6:00 p.m., Monday through Saturday." Page 31 of the same document also states that "the hours of emissions for modeled sources were set to 6:00 a.m. to 6:00 p.m. Monday through Saturday for all sources except for blasting." There are a number of concerns we have with this proposal, especially considering that our church congregants regularly include population groups that are highly sensitive to air pollution as listed on Page 11 of the *Air Quality and Greenhouse Gas Assessment*: "the elderly over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis." Besides the weekly Saturday services, our property regularly hosts summer camps and other events where high risk population groups are present. In light of this, we are requesting that the Amador County Planning Department require an **Environmental Impact Report (EIR)** for the proposed Pilgrim Rock Quarry. We need to further understand the various impacts that this project will have on our church and community and how these impacts can be mitigated to protect our vulnerable population groups.

Besides the concerns related to air pollution, our church members and residents have voiced serious concerns related to the potential impact to our water supply. Currently our well, which provides the sole source of water to our property, is 60 feet deep and produces 100 gallons of water per minute. Page 6 of the *Reclamation Plan for Pilgrim Rock Quarry* states that "groundwater

varies between 90 and 350 feet bgs” (below ground surface), and also that “exploratory holes drilled in the Gopher Ridge Volcanics geologic unit within the quarry footprint did not encounter any groundwater at elevations of 222 feet AMSL. We do not anticipate significant quantities of groundwater above the planned quarry depth of 220 feet AMSL.” This anticipation is highly concerning considering that our well is 60 feet bgs (below ground surface) and its base is at an elevation of approximately 228 feet AMSL (above mean sea level) where we have found a significantly high amount of groundwater. Attached to the *Use Permit Application* the checklist for compliance with the *Surface Mining and Reclamation Act of 1975* and the *California Code of Regulations* under CCR 3710(a) related to “Hydrology and Water Quality” affirms that “water quality, recharge, and groundwater storage that is accessed by others shall not be diminished, except as allowed by plan.” Due to this inconsistency and the potential diminishing of our groundwater supply and quality, we feel the need to again stress the importance of a full **Environmental Impact Report (EIR)**. This would ensure that all possible steps were taken to mitigate against the loss of our water supply due to this project. We cannot overstate the importance of this aspect of the project and the potential financial burden it will place on our community and the various institutions that operate on the property.

We are also concerned with the impact this project will have on the value of our property. We have used this property for church services and many other activities for over 50 years, and it is our most valuable asset within this northern California region of our denomination. We feel that it is important that the Amador County Planning Department works together with us and R.A. Home Investments to mitigate against the potential negative impacts to our property and the functions for which it is used.

We thank you for your consideration in this matter. If you would like to discuss further, you may contact me directly via email at secretary@sdarmncc.org or by phone at (916) 538-4438.

On behalf of the NCC Executive Committee,



Jordan Chapman | Secretary
secretary@sdarmncc.org

CC:

Ruslan Bratan
California Air Resources Board
California Environmental Protection Agency
California State Water Resources Control Board
SDARM NCC Executive Committee