



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

June 12, 2017

State Mining and Geology Board  
Attn: Annual Inspections  
801 K Street, MS 20-15  
Sacramento, CA 95814

**RE: Comments on Proposed Rulemaking Package #3 - Surface Mining  
Operation Annual Inspections**

To Whom It May Concern:

On behalf of the Rural County Representatives of California (RCRC), I write to submit comments on the proposed regulatory language associated with Surface Mining Operation Annual Inspections in the California Code of Regulations that the Division of Mine Reclamation (DMR) has put forward.

RCRC is an association of thirty-five rural California counties, and the RCRC Board of Directors is comprised of an elected supervisor from each of those member counties. Members of Boards of Supervisors, in conjunction with the County staff, are responsible for the proper permitting, oversight, and monitoring of mining and reclamation activities conducted within the county in compliance with the Surface Mining and Reclamation Act.

RCRC concurred and supported the revisions contained within Assembly Bill 1142 (Gray, 2016), and the lead agency annual inspection qualifications was a topic that received much discussion throughout legislative process. We believe the regulatory language should clearly state that the lead agency employee, if not a California state-licensed person as specified in Public Resources Code Section 2774 (b)(1), be required to take the training provided through the DMR as specified in Public Resources Code Section 2774 (e). We also would like to see more clarity as to when a California state-licensed professional is required to be engaged. For additional clarifications, RCRC respectfully asks that you consider the suggested amendments to the proposed language as shown on the attachment.

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RCRC appreciates this opportunity to comment on the proposal, and we hope our proposed language will be considered. If you have any questions or wish to have further discussions, please contact me at [mpitto@rcrcnet.org](mailto:mpitto@rcrcnet.org) or (916) 447-4806.

Sincerely,

A handwritten signature in black ink that reads "Mary Pitto". The signature is written in a cursive style with a large, looped initial "M".

MARY PITTO  
Regulatory Affairs Advocate

cc: Pat Perez, Division Supervisor, Division of Mine Reclamation  
RCRC Board of Directors

Attachment: Proposed Amendments