

From: [Office Manager](#)
To: info@lci.ca.gov; [Fau, Jacquelynn@DOC](mailto:Fau.Jacquelynn@DOC); CEQA@wildlife.ca.gov; [Van Hattem, Michael@Wildlife](mailto:Van.Hattem.Michael@Wildlife); andrew.torres@noaa.gov; [Tracy Boze - NOAA Federal](#); [McClenagan, Laura](mailto:McClenagan.Laura); Jonathan.Hollis@wildlife.ca.gov; Bryan.McFadin@waterboards.ca.gov; Joel.Bisson@waterboards.ca.gov; [Seemann, Hank](#); claire.meehan@conservation.ca.gov; [Martin, Andrew D \(Drew\) CIV USARMY CESPN \(USA\)](mailto:Martin.Andrew.D.(Drew).CIV.USARMY.CESPN.(USA)); michael.hampton@wildlife.ca.gov
Cc: [LCI State Clearinghouse](#); askregion1@wildlife.ca.gov; hcpb@wildlife.ca.gov
Subject: Environmental Concern-Inadequate CEQA and MND for Bridgeville Quarry
Date: Friday, July 17, 2026 1:52:29 PM
Attachments: [BridgevilleQuarryCEQA_7.17.26](#)

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To Whom It May Concern,

Chalk Mt Ranch LLC submits the attached letter regarding the Bridgeville Quarry, State Mine ID 91-12-0081, located at 47400 Alderpoint Road in Bridgeville, California. Chalk Mt Ranch LLC believes the Mitigated Negative Declaration adopted for the project is inadequate under the California Environmental Quality Act because it relies on an incomplete project description, deficient environmental impact analysis, and insufficient mitigation measures.

The MND does not adequately identify or evaluate all areas used for quarry operations, including adjacent lands that have been used without authorization. It also fails to analyze land use impacts on those adjacent parcels and does not address expanded operational use beyond what existed at the time of the lead agency's 2005 determination.

- Humboldt County Assessor's Parcel Numbers: 207-181-016 and 207-182-009
- State Clearinghouse Number: 2005042031
- Bridgeville Quarry State Mine Id: 91-12-0081
- County of Humboldt Conditional Use Permit of Surface Mining: CUP-02-19X

Please see attached letter and related documentation.

I appreciate your time and attention to this matter.

Thank You,
Lauri Barnwell

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Chalk Mt Ranch LLC
PO Box 68
45000 Alderpoint Road
Bridgeville, CA 95526
[*chalkmtranchllc@gmail.com*](mailto:chalkmtranchllc@gmail.com)
(707)777-3616 Office

To: Land Use and Environmental Agencies

From: Chalk Mt Ranch LLC
PO Box 68
Bridgeville, CA 95526

Date: July 17, 2026

Subject: Environmental Concern-Inadequate CEQA and MND for the Bridgeville Quarry
Humboldt County APNs: 207-181-016 and 207-182-009
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Project Background and CEQA History

In 2005, the Bridgeville Quarry, operated by LADD Associates, was subject to CEQA review, and the County of Humboldt adopted a Mitigated Negative Declaration in support of the project. In 2008, the County approved a modification to the 2005 approval that increased the annual amount of rock authorized for mining. No other changes were made to the 2005 approval, and the modification did not alter the 15-year permit term. The County readopted the prior MND in support of that modification.

In 2021, Mercer Fraser Company, which had been the operator of record since October 2010, applied to renew the Conditional Use Permit for Surface Mining and Reclamation Plan for an additional 15-year term. At renewal, Mercer Fraser did not request or identify changes to the approved operations or permit elements.

Adjacent Property Impacts and Notices of Violation

Chalk Mt Ranch LLC owns property adjacent to the Bridgeville Quarry and operates a family-owned cattle and timber ranch. In October and December 2024, during a commercial timber pre-harvest inspection, representatives from multiple state agencies, including CalFire, the Department of Fish and Wildlife, and the State Water Board, were on site.

During that inspection, agency representatives observed an access road used by quarry operator Mercer Fraser Company on Chalk Mt Ranch LLC property. The road showed evidence of discharges, and threatened discharges, to watercourses. On December 31, 2024, Chalk Mt Ranch LLC, Mercer Fraser Company, and quarry owner Goat Rock Ranch LLC received a Notice of Violation concerning Chalk Mt Ranch LLC APNs 207-186-033, 207-186-013, and 207-182-010.

Chalk Mt Ranch LLC worked with the State Water Board and CalFire to implement interim measures to prevent further damage until the required corrective actions could be completed under the Notice of Violation and Ash Flat THP 1-24-00141-HUM. Chalk Mt Ranch LLC completed all required mitigation, stabilization, and decommissioning measures to the recommendations of the governing agencies by October 15, 2025.

After the December 2024 violation, Mercer Fraser Company conducted significant construction activities on Chalk Mt Ranch LLC APN 207-182-010 without authorization from Chalk Mt Ranch LLC and without required permits. The August 2, 2025 activities included:

- Removal of approximately 480 cubic yards of native soil;
- Removal of a white oak tree;
- Exposure of roots on multiple additional trees; and
- Work within a County Streamside Management Area and Class I Watercourse Lake Protection Zone.

These activities also occurred in violation of the active Ash Flat THP and on lands subject to a conservation easement.

Permit Review and Compliance Concerns

In response to the unauthorized road widening, Chalk Mt Ranch LLC obtained a copy of the Humboldt County Conditional Use Permit for Surface Mining issued to Mercer Fraser Company for Bridgeville Quarry operations. Upon review, Chalk Mt Ranch LLC found that Mercer Fraser Company appeared to be operating in noncompliance with multiple permit restrictions.

Further review indicated that Mercer Fraser Company did not possess, and does not currently possess, permits required by the CUP for quarry operations, including:

- Section 401 Water Quality Certification;
- U.S. Army Corps of Engineers Section 404 authorization;
- Lake and Streambed Alteration Agreement; and
- County of Humboldt North Coast Unified Air Quality Management District Permit to Operate.

Failure to Include Chalk Mt Ranch LLC Parcels in Environmental Review

The foremost concern is that Chalk Mt Ranch LLC APNs affected by quarry operations, and used without agreement, were not included in the CEQA review. The CUP, original Plan of Operation, and agency recommendations reference roads and access on Chalk Mt Ranch LLC property, and the MND includes extensive discussion of road construction and maintenance required for quarry operations.

The MND also identifies environmental concerns related to stream crossings, biological resources, and wildlife habitat. However, because Chalk Mt Ranch LLC APNs were not included in the review, there is no clear basis to conclude that quarry activities on those parcels were properly disclosed, reviewed, authorized, or mitigated.

The Conditional Use Permit maps lack sufficient detail and show only the immediate project site. They include limited reference to the lower quarry road used to access the quarry base and processing area, but do not depict the full road as it crosses Chalk Mt Ranch property, including its multiple stream crossings and habitat areas. The upper quarry road, which is also located on Chalk Mt Ranch LLC property and used by Mercer Fraser Company to access the top outcrop of the quarry is omitted entirely from the associated quarry documentation.

The upper quarry road was added to Mercer Fraser Company's Storm Water Pollution Prevention Plan only after the December 2024 Notice of Violation. The failure to review these critical operational components is not a minor oversight; it is a fundamental compliance failure affecting environmental protection, land use designations, adjacent property rights, and liability.

Conservation Easement Conflict

In 2009, Chalk Mt Ranch LLC entered into a CalFire Forest Legacy Conservation Easement, which was recorded with the Humboldt County Recorder's Office in January 2010. The conservation easement encompasses all Chalk Mt Ranch LLC APNs adjacent to Goat Rock Ranch LLC and the Bridgeville Quarry.

The failure to include Chalk Mt Ranch LLC APNs in the CEQA and MND review has created a conflict between compatible and approved land uses. If the Chalk Mt Ranch LLC APNs had been included in the CUP review process, the conditional limitations affecting surrounding and adjacent lands would have been apparent. Instead, Chalk Mt Ranch LLC has been left subject to a Chalk Mountain Phase 1 Conservation Easement Notice of Violation.

County Follow-Up

In February 2026, representatives of Chalk Mt Ranch LLC met with the County of Humboldt Planning Department Director and staff to discuss concerns regarding the Bridgeville Quarry Conditional Use Permit. Director Ford requested three weeks to review the matter and follow up with Chalk Mt Ranch LLC. To date, Director Ford has not provided a response or meaningful follow-up.

Request for Review and Interim Suspension

The County of Humboldt's failure to properly review the Conditional Use Permit and ensure that all operational activities and affected areas were included has left Chalk Mt Ranch LLC with environmental damage, notices of violation, and multiple legal disputes directly arising from actions by Bridgeville Quarry operator Mercer Fraser Company.

Chalk Mt Ranch LLC requests a formal and comprehensive review of the CEQA Categorical Exemption and associated Mitigated Negative Declaration for the Bridgeville Quarry. Chalk Mt Ranch LLC also requests that activities conducted by Mercer Fraser Company on APNs not included in the Conditional Use Permit be suspended pending the outcome of that review.

Conclusion

Thank you for the opportunity to present these concerns. Chalk Mt Ranch LLC respectfully requests that your agency review the deficiencies identified above. Your time and attention to this matter are appreciated.

Sincerely,



Lauri Barnwell
Chalk Mt Ranch LLC
chalkmtranchllc@gmail.com

Attachments:

Due to the file size of the associated documents, they are being provided via Dropbox.

https://www.dropbox.com/scl/fo/eej0ebdx260e29of1ao41/AECnSQoZHo_2K_yh2gl3EJc?rlkey=27zp4aximqoeb5fo4d6sduhb8&st=jr5d22lk&dl=0

1. Property Location Map
2. Bridgeville Quarry Site Maps
3. Humboldt County Conditional Use Permit for Surface Mining CUP-02-19X
4. 2005 State Clearinghouse and MND documentation
5. 2021 County of Humboldt Project Transmittal Documentation
6. State Water Board December 31, 2024 Notice of Violation
7. CalFire September 3, 2025 Conservation Easement Violation Notification
8. State Water Board April 1, 2026 Notice of Violation

Please feel free to contact me directly for any file assistance.