

DECLARATION OF JOHN McKEOWN

I, John S. McKeown, declare as follows:

1. I am a Senior Geologist, employed by Terracon Consultants, Inc. I have personal knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those, I am informed and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein. I make this declaration in support of Robertson's Ready Mix's ("RRM") Request for Determination of Vested Rights ("RFD").

2. I am a licensed Engineering Geologist, California license number E.G. 2396.

3. My professional experience includes, but is not limited to, examination of natural and man-altered terrain, geologic mapping, and rock mine slope mapping for the purposes of mine reclamation planning. My expertise includes identification of man-placed fills and disturbed ground.

4. On behalf of RRM, I undertook geologic field reconnaissance; reviewed available historical documents, aerial photos, and pertinent maps; and reviewed Light Detection and Ranging ("LiDAR") information and maps of the HH VRA.

5. I field checked areas within the HH VRA identified as potential mining disturbances during multiple field visits in 2021.

6. Following completion of the above described scope of work, I prepared a report detailing findings of historic surface mining activity within the HH VRA. A true and correct copy of that report is attached hereto as **Exhibit 1**.

7. As part of those findings, I determined that twelve (12) of fourteen (14) areas I examined exhibited features consistent with historical surface mining activity.

8. Based on my review of the HH VRA as documented on **Figure B-3.9** located in **Appendix B** of the RFD, and considering the distribution of documented disturbances and areas

of mining activity influence within the HH VRA, it is my opinion that approximately 61% of the 792 acre property (or approximately 486 acres) have been subject to surface mining activity, including surface mining operations (quarrying, excavation, etc.); surface mining activity (haul roads, stockpiling, etc.); and exploration (drill holes, prospecting, etc.).

9. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 14th day of December, 2021, at Colton, California.

John S. McKeown
E.G. 2396