Water Resources Advisory Committee

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Russ Thompson *Atascadero*
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John Neil *Atascadero MWC*
Tisdel Thomas *California Men's Colony*
John Reid *Camp SLO*
Edralin Maduli *Cuesta College*
Mark Zimmer *Golden State Water*

May 2, 2013

Honorable Paul Teixeira
Chairperson, Board of Supervisors
County of San Luis Obispo
1050 Monterey Street
San Luis Obispo, CA 93408

Subject: WRAC Comments on the Water Resources Components of the Oster/Las Pilitas Quarry Project Draft Environmental Impact Report

Dear Chairperson Teixeira:

On June 21, 2011, your Honorable Board approved a contract with URS Corporation to prepare an Environmental Impact Report for the proposed Oster/ Las Pilitas Quarry Conditional Use Permit/ Reclamation Plan. The Draft Environmental Impact Report (DEIR) involved an analysis of the applicant's (Las Pilitas Resources LLC) request for a Conditional Use Permit/ Development Plan and Reclamation Plan to allow for an aggregate quarry and asphalt and concrete recycling facility. On October 3, 2012, the Water Resource Advisory Committee (WRAC) formed an ad hoc subcommittee whose purpose was to review and comment on the water resources components of the subject DEIR.

Subcommittee members included Member John Hollenbeck (District 5), Member Eric Greening (Environmental At-Large), Member John Neil (Atascadero Mutual Water Company), Member John Reid (Camp San Luis Obispo), and Member Jim Toomey (District 2). Member Hollenbeck served as chair to the ad hoc subcommittee. The subcommittee met on June 20, 2012, and subsequently developed a subcommittee report (attached).

On May 1, 2013, the WRAC reviewed and approved the ad hoc subcommittee's report and voted (10-0-0) to submit the attached comments to your Honorable Board for further consideration.

Respectfully,

SUE LUFT
Chairperson, Water Resources Advisory Committee

cc: SLO County Board of Supervisors
SLO County Planning Commission
Murry Wilson, County Department of Planning and Building

Purpose of the Committee:

To advise the County Board of Supervisors concerning all policy decisions relating to the water resources of the SLO County Flood Control & Water Conservation District. To recommend to the Board specific water resource programs. To recommend methods of financing water resource programs.

Excerpts from WRAC Bylaws dated 8/28/2012

Attachments[1]: Subcommittee Report on Water Resources Comments on the Draft Environmental Impact Report (DEIR) for the Oster/ Las Pilitas Quarry

[1] Related correspondence submitted to the WRAC can be found at:
http://www.slocountywater.org/site/Water%20Resources/Advisory%20Committee/Submittals/

MEMORANDUM

April 22, 2013

TO: Water Resources Advisory Committee (WRAC)
c/o Ms. Sue Luft, WRAC Chairman

FROM: John R. Hollenbeck, WRAC Member, District 5
Chairman, Ad Hoc Subcommittee, Oster/Las Pilitas Quarry Project

SUBJECT: Suggested Water Resource Comments on the Draft Environmental Impact Report (DEIR) for the Oster/Las Pilitas Quarry

At its meeting on October 3, 2012, the WRAC formed an Ad Hoc Subcommittee (Subcommittee) to review the water resources components of the DEIR of the Oster/Las Pilitas Quarry Project (Project). The DEIR was released on or about April 2, 2013. The Subcommittee met at 3:00 p.m. on Thursday, April 18, 2013, at the offices of the Atascadero Mutual Water Company. Membership of the Subcommittee includes:

Member John Hollenbeck (volunteered February 6, 2013)
Member Eric Greening (volunteered October 3, 2012)
Member John Neil (volunteered October 3, 2012)
Member John Reid (volunteered October 3, 2012)
Member Jim Toomey (volunteered December 5, 2012)

The purpose of this memorandum is to propose comments regarding water resources discussed within the DEIR. These proposed comments are offered by the Subcommittee for the WRAC to consider at its May 1, 2013, meeting.

1. The Las Pilitas Resources LLC (Applicant) issued the revised Conditional Use Permit (CUP) Application Packet for File No. DRC2009-00025 on March 22, 2010, via memorandum to the County. The paragraph atop page 6 of 18 of the revised application states *"A portion of high quality aggregate will be washed and sorted for use in the manufacturing of Portland Concrete Cement and Hot Mix Asphaltic Concrete as well as being sold to customers for specialty applications."* which appears to be inconsistent with the following statements from the DEIR:
    a. first sentence of the second paragraph of Section ES.3 of the DEIR, which states "The project will produce up to 500,000 tons per year of aggregate for use in Portland cement concrete (PCC) and asphaltic

concrete (AC). (the inconsistency is the lack of the description of washing the aggregate)

b. first sentence of the first paragraph of Section 2.3.5 of the DEIR, which states "Due to the type of rock product proposed, and the nature of the granitic material to be mined, the applicant was not proposing to wash any of the material that is processed."

The inconsistencies are:

- The revised CUP Application states that a *"portion of high quality rock"* without providing any quantity or estimate on what constitutes "a portion" whereas the sentence referenced in ES.3 would indicate that all 500,000 tons per year would be aggregate used for PCC; therefore, the CUP application would indicate that some level of washing of concrete aggregate is an expected operation of the quarry and as such the impacts to water resources of washing aggregate is not fully addressed within the DEIR. Please identify, address, and correct this inconsistency.
- The revised CUP Application clearly states that washing quarried material in the production of concrete aggregates will occur, whereas the sentenced referenced in Section 2.3.5 says the applicant was not proposing to wash any of the processed material. Please identify, address, and correct this inconsistency.

2. The DEIR states that the Project will produce aggregate for PCC and AC. Industry standards typically require the aggregate for the PCC to be a washed product. Where (geographically) will the washing of the coarse aggregate occur? Please identify which watershed(s) in San Luis Obispo County within which the offsite impacts of washing of PCC aggregates will occur, and impacts thereon to water supply and water quality.

3. In addition to the high quality aggregates, what other products, if any, are going to be produced from the Project? Please identify all of them.

4. The estimated 4,000 gallons per day for dust control appears low, and the DEIR does not provide a clear understanding of the annual distribution of water usage, nor is it clear how much land area is expected to be actively disturbed and requiring dust control. What are the dust control water supply and usage hydrographs (water volume vs. months) and what is the maximum actively disturbed area that will engage a water application procedure to control dust?

5. What are the best management practices for the application of water as dust control? Please describe in detail.

6. The DEIR mentions the use of dust suppressants, but the DEIR does not contain the Material Safety Data Sheet (MSDS) information on the chemicals. What are the water quality implications of the application of these suppressants?

7. Regarding the section in Chapter 4 on Air Quality, on page 4-3.28, the second air quality mitigation states *"Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency would be required whenever wind speeds exceed 15mph. Reclaimed (non-potable) water should be used whenever possible."* The phrase *"in sufficient quantities to prevent airborne dust from leaving the site"* is an open-ended and immeasurable criterion; therefore, the two questions are:

    a. What is the objective criterion for measuring the fugitive dust that leaves the site?

    b. What quantity of water is needed to accommodate this mitigation measure?

8. Regarding the section in Chapter 4 on Air Quality, on page 4-3.28, the third air quality mitigation states *"All soil or product stockpile areas should be sprayed daily as needed, or be covered or treated to minimize windblown dust."* Which of the above air quality control methods are expected to be used and what are the water quantity and quality implications?

9. The WRAC has reviewed the domestic water quantity and quality discussions (both water and wastewater) and currently does not have any comments.

The following is a list of additional materials that the Subcommittee reviewed during the course of the DEIR review. We understand that these documents will be placed on the WRAC's portion of the County's web site (www.slocountywater.org).

Item No.	Description
1.	Letter from Mr. Roy Reeves to CalRecycle, March 16, 2012.
2.	Letter from Mr. Roy Reeves to Water Quality Control Board, Central Coast Region, July 6, 2012.
3.	Letter from Margarita Proud to the Water Resources Advisory Committee, November 27, 2012.
4.	Letter from Margarita Proud to the Water Resources Advisory Committee, April 14, 2013