

SANTA MARGARITA COUNTY SERVICE AREA NO 23 ADVISORY GROUP
P. O. BOX 397, Santa Margarita, CA 93453
Smcsa23@yahoo.com

2013 JUN - 4 AM 10: 36
SLO COUNTY
PLANNING/BUILDING
DEPT

June 3, 2013

TO: San Luis Obispo County Board of Supervisors
Debbie Arnold, District 5
Frank Mecham, District 1
Bruce Gibson, District 2
Adam Hill, District 3
Paul Teixeira, District 4
Murray Wilson, County Planning Department

Subject: CSA 23 Advisory Group response to Draft Environmental Impact Report (EIR) for the Oster/Las Pilitas Rock Quarry.

The CSA Advisory Group's General Statement and Procedures states: "While the group is not directly concerned with the land use planning function, or public health safety and welfare, it may be involved in such activities to the extent that it considers the adequacy of proposed public services to any proposed development in the Community".

The Santa Margarita CSA 23 Advisory Group is submitting the attached response to the Draft EIR for the Oster/Las Pilitas Rock Quarry. The Advisory Group has reviewed the Draft EIR and believes the proposed rock quarry is not necessary and will create a substantially negative impact and safety hazard for the community of Santa Margarita.

The CSA 23 Board has unanimously voted to request a "no vote" on this project.

Thank you for your consideration on this project.

Sincerely,



Sharon Marini
Chairperson

SANTA MARGARITA COUNTY SERVICE AREA NO. 23 ADVISORY GROUP
P.O. Box 397, Santa Margarita CA 93453
Smcsa23@yahoo.com

June 3, 2013

**CSA 23 Review of Draft Environmental Impact Report (DEIR)
For the Oster/Las Pilitas Rock Quarry**

In the opinion of the CSA 23 Advisory Board, The Oster/Las Pilitas Rock Quarry DEIR falls short in providing accurate information and or identifying specific details in the Community of Santa Margarita.

General Concerns:

- The need for an additional quarry in this area is overstated. With the proposed Hanson Aggregates Santa Margarita Quarry Expansion submitted April 26, 2013, to extend the current rock quarry in Santa Margarita by 369 acres over a period of 59 years, any reduction or elimination of current truck traffic utilization is highly questionable.
- **4.11.pg 29** The DEIR fails to reference the proposal of the Santa Margarita Ranch to develop in excess of 100 homes, which will use the same roadways as the Las Pilitas Quarry Project. It is short sighted to not include this future projection, just because the Board has not approved such project.
- Cumulative impacts of a proposed church to be built near the school on H Street have not been addressed or evaluated.
- **It is the opinion of the Advisory Board this project will negatively affect the quality of life in the Community of Santa Margarita.**

4.11 Transportation and Circulation (Traffic) Concerns:

- **4.11. pg4, pg5 and 4.11. pg6:** The standard of measurement of levels of service is not appropriate for the small rural community of Santa Margarita.
- **4.11.3:** The stated school hours for crosswalk use are incorrect. Kindergarten dismissal is 11:20, so increased school traffic will be present at mid day not just early and late as stated. The DEIR may be correct based on a time weighed traffic pattern, however, the intersection of H Street and Estrada (State Road 58) where school traffic enters a dead end street has major traffic congestion several times per day and during RR crossings. The Santa Margarita School is of major importance to the community as our children are our primary concern.
- Traffic shortcutting through the residential areas of Santa Margarita is grossly under estimated. The DEIR fails to mention the intersection of I Street and Estrada (SR 58). I Street is the only through roadway in Santa Margarita if vehicles are to avoid the "scenario" intersections. Additional traffic will have a

major impact on the residential community. It is anticipated many vehicles will pass the “scenario” intersection to avoid delay. There is not a complete analysis of traffic (short cutting) patterns in the community either by volume or speed. There are no mitigation measures proposed for I Street. We feel additional investigation is needed to determine the impacts and solutions.

4.11. pg4: The SR 58 curve at J Street is under designed to handle two large trucks, bike riders or pedestrians at the same time. This is a significant issue and would require road improvements to mitigate. The roadway must be designed to accommodate simultaneous use at this section of the road.

- There is a CalTrans sign posted El Camino Real and H Street on SR 58, stating “Trucks not recommended” on SR58
- **4.11. pg8:** The project must contribute their fair share for any improvements needed to the SR 58/ Hwy 101 interchange. SLOCOG must be consulted for all interchange or overpass improvements required.
- **4.11. pg10:** The DEIR incorrectly states that there is one RTA bus stop in Santa Margarita at El Camino Real and Encina Street. There is a second stop near Ancient Peaks Winery on El Camino Real near Maria Street. Each bus stop has a north and south loading location. Since the traffic impact cannot be mitigated to a level of insignificance, the Santa Margarita community should receive some improvements in the traffic areas, such as:
 1. Bus shelters at both bus stops (north and south)
 2. Improvements and expansion to the SR 58/101 Park and Ride lot
 3. Bike lanes through Santa Margarita from Hwy 101 to the SR58 cutoff to California Valley
- **4.11. pg13:** Policy 7: This project is not consistent as it’s corrections cannot be mitigated to a level of insignificance.
Policy 4: This project does nothing to address multi-use trails, bicycle lanes and pedestrian walkways, and therefore is potentially inconsistent with County Policy.
- **4.11.pg19:** The mitigation measures under estimate impacts in the following areas:
 1. North bound elevation gain at SR 58 and El Camino Real
 2. Affect of the Railroad grade crossing
 3. PUC input has not been addressed
 4. Traffic short cutting through residential areas of Santa Margarita
 5. Traffic congestion at school crossings
 6. El Camino Real south bound traffic at SR 58 as to volume and speed during critical school hours and other special events
 7. Acceleration ability of loaded trucks on to El Camino Real from a stopped position creates a major traffic safety hazard
 8. CalTrans sign posting of trucks not recommended on SR 58 roadway to be used by project.

Without additional mitigation this cannot be considered “less than significant”.

- **4.11. pg20:** State of California’s “Level of Service” criteria is not appropriate for a small rural community like Santa Margarita. The residential impacts would be significant if using State standards as used in the DEIR, however, a rural community standard should be applied to a small residential community such as Santa Margarita.
- **4.11. pg21: Traffic and Pedestrian Safety:** The Traffic Study by TPG consultants which is cited and used as a traffic and pedestrian count in the DEIR was for only one day, 4/7/09 (appendix Table A-1). It is not nearly enough to conclude what actually happens at these intersections during inclement weather and special events.

School Crossing: The crossing guard has incurred several near catastrophic incidents in the past year, where vehicles have failed to slow down or stop for pedestrians in the crosswalk . Also the CalTrans light installed at this location has failed on several occasions as reported by Santa Margarita Fire Department. There is a sight distance issue at the intersection of I Street and Estrada (SR 58) due to a small hill for vehicles north bound. This rise in the roadway greatly reduces the visual distance for approaching vehicles to the H Street School crossing intersection. The statement that quarry truck drivers sitting in a higher position can see the crosswalk from 350 feet away is questionable, as the ability to see a “stragglng” pedestrian. Futher investigation of the ability of said drivers to stop in a safe and reasonable distance should be conducted.

Pedestrian Crossing of El Camino Real: No mitigation is being recommended for the business district of Santa Margarita, where all the residents in the community must obtain their mail as there is no home delivery mail service. Most business services are located in this area thus creating an additional traffic hazard.
- **Park and Ride:** Stopping distances of trucks heading north on Hwy 101 are a serious safety concern as they are rapidly approaching the exiting Park and Ride lot located on El Camino Real.
- **4.11. pg23: Mitigating Measures:**
 1. **Traffic 2a.** Where are the Applicant Proposed Measures LU-1A mentioned in the DEIR and how do they actually mitigate problems at the school crossing to a “less than significant” status?
 2. **Traffic 2b.** Regarding section Pedestrian Crossing at Encina Avenue quoted as “or related pedestrian safety improvements considered with Design Plan”: These improvements should be mentioned as mitigations so the public and decision makers are aware of mitigations to make the determination that the impact is “less than significant”.
- **4.11. pg24:**

Traffic 3b. Add the following mitigation: No quarry related traffic will be allowed to stage or park within the boundaries of community of Santa Margarita due to air quality and noise issues.

- Recommendations:
 1. A third party enforcer should be hired by the County and paid for by the Quarry to monitor safety concerns and implementation of traffic mitigations, including but not limited to speeding, parking, noise and air quality issues which should not be the sole responsibility of the Quarry management.
 2. Consequences should be in place for violations of these infractions.

4.8 Noise

- **4.8. pg16:** The DEIR should only state that the noise impact is “significant and not mitigateable” after all remediation strategies have been implemented and investigated. Such things as sound proofing residence in areas of significant impact should be considered, i.e. triple paned windows and any other recommended sound mitigation available
- The level of severity for noise does not accurately reflect the community values for noise pollution in the rural community of Santa Margarita.
- Noise is created and dispersed through various factors such as empty vs. loaded trucks, speed, road surface, topography and existing structures. These types of issues for noise need to be addressed. This is particularly important for critical noise levels along SR 58 and the east and west entrances to Santa Margarita.
- Quality of Life issues have been grossly underestimated in the DEIR.
- **More attention should be directed to an alternative project which would route traffic around the community of Santa Margarita and through the Santa Margarita Ranch or connecting to the Hanson Road route through the Santa Margarita Ranch currently used by Hanson Aggregates.**
- Traffic on SR 58 through the town of Santa Margarita has not been adequately addressed.
- Measures such as:
 1. Sculptured and landscape center dividers
 2. Sidewalks built along roadways
 3. Additional crosswalks, more clearly marked

These measures may assist in slowing traffic.

- Noise and traffic are impacts that must be brought to a level of insignificance to address the community’s concerns for traffic, noise and safety.
- Please add additional noise mitigation: Quarry owners should look into creating a railroad “quiet zone” to offset the noise impact that cannot be mitigated. Providing some improvements to the train crossings to reduce whistle/horn blowing with-in the town of Santa Margarita.