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Mr. Murry Wilson, Environmental Resource Specialist  
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(Submitted by email.)

**URS Corporation March 2013 "Draft Environmental Impact Report, Las Pilitas Quarry, Conditional Use Permit and Reclamation Plan" (DEIR)**

Dear Mr. Wilson:

Thank you for the opportunity to submit the following comments on the proposed Las Pilitas Quarry DEIR for consideration and appropriate response, pursuant to the California Environmental Quality Act (CEQA) and other applicable laws. As a California Professional Geologist and Certified Hydrogeologist, I am particularly familiar with some issues raised below. References herein are to the DEIR unless indicated otherwise.

#### ASPHALT AND CONCRETE DEBRIS RECYCLING

- Procedures for determining if imported asphalt/concrete debris is inert are not specified by the DEIR. Section 2.3.1, page 2-6 states asphalt and concrete debris is prohibited unless it is inert, and inert is partly defined as not containing soluble pollutants in excess of water quality objectives.

Asphalt and concrete debris potentially contains a wide variety of pollutants generated during its many years of service, in addition to pollutants originating from the material itself. For example, asphalt debris from former roads might contain fuels, pesticides, solvents, metals and other pollutants released from trucks. Those pollutants are potentially soluble, and their solubility is potentially increased by crushing.

Pollutant concentrations comprising water quality objectives are generally low, and soluble fractions of pollutants in crushed asphalt/concrete debris potentially exceed those objectives. Testing procedures, methods, frequencies and locations to determine compliance with the inert classification should be specified by the DEIR.

- Environmental impacts of rejecting loads of imported asphalt/concrete debris because they do not qualify as inert, or for other reasons, are not addressed by the DEIR. For example, this might result in additional transport miles to haul the debris to another location.
- Asphalt debris is reportedly prohibited from recycling at the site if it contains oil (Section 2.3.1, page 2-6 and elsewhere), yet virgin asphalt is comprised partly of petroleum hydrocarbons. This apparent discrepancy is not addressed by the DEIR.

- Potential groundwater impacts from soluble pollutants percolating from imported asphalt/concrete debris are not addressed by the DEIR. For example, such soluble pollutants might be present in, and released from, onsite debris because inadequate sampling procedures failed to detect them.
- Regarding asphalt/concrete debris recycling, compliance with laws other than the DEIR referenced California Code of Regulations Title 14 (CCR 14) is not thoroughly addressed. For example, the California Water Code and CCR 27 are potentially applicable to storage, handling and treatment of imported asphalt/concrete debris, particularly if the debris does not qualify as inert.
- The potential for onsite asphalt/concrete debris to contain pollutants at concentrations qualifying it as CCR 22 Hazardous Waste is not addressed. This might result from inadequate profiling.

#### WATER SUPPLY (Sections 2.3.5 and 4.13, and Appendix F)

- Adequacy of the proposed water supply is not demonstrated, and potential environmental impacts from its use for the project are not thoroughly evaluated.
- Section 2.3.5, page 2-10 and elsewhere state project water needs (dust control, irrigation and potable use) will be supplied by Well A. Well A is reportedly about 80 feet from the Salinas River, is reportedly shallow, and reportedly pumps from Salinas River underflow, however, no data verifying these statements are presented. For example, no well logs or other data verifying or even stating actual well depth, screen interval, rock type at the screen interval, or other specifics, are presented.

Therefore it is not possible to determine whether Well A actually pumps from Salinas River underflow, from underlying fractured granite, or from both. Partly because the source of water produced by Well A is not demonstrated, environmental impacts of Well A pumping cannot be fully evaluated. For example, if Well A produces from fractured granite, potential impacts to nearby domestic wells also producing from potentially hydraulically interconnected fractured granite should be addressed.

- Page F-8 states a four hour pump test of Well A produced 25 gallons per minute (gpm) with one foot drawdown, however no further information on the pump test is provided. The statements alone do not provide assurance that Well A can sustain 25 gpm production. For example, the most rudimentary information such as pump test date is lacking. If Well A produces from Salinas River underflow, and the pump test was conducted during the rain season when Salinas River flow was high, the pump test results likely do not apply to summer months when Salinas River flow is low or possibly lacking. Also, pump rate/drawdown/time curves are not provided, which might indicate 25 gpm production is not sustainable, might indicate a single well four hour pump test is insufficient to confidently determine sustainable production rates, and other. It is not possible to draw confident conclusions regarding Well A sustainable production rates from the very limited information provided.
- The last paragraph of page F-6 states no water shortages are known for the project vicinity. That is not accurate, as the very limited production capability from subject

fractured granite is known throughout the industry, and is essentially common knowledge among local residents and other lay people.

- Assuming Well A produces from Salinas River underflow, annual average river flow rates are provided by the DEIR. However, daily flow rates, which are possibly more important, are not presented. Annual river flow might appear adequate for the project, but if much of the annual flow is during rain season months, with little or no flow during dry months when dust suppression water is most needed, the water supply will likely be insufficient. Detailed Salinas Dam release records on a daily basis are not presented or summarized, and they potentially document low or no water release during particularly dry periods.

#### AIR QUALITY

- Section 4.3 and Appendix D do not address environmental impacts from potentially increased radon generation during proposed mining. Radon is a radioactive, carcinogenic gas sometime associated with granitic rocks and soils. It can potentially be mobilized to the surface and to human receptors by mining or other activities that increase gas permeability of the rock. Subject granite potentially generates radon, and mining activities could increase that radon generation. Environmental impacts from potentially increased radon generation should be addressed by the DEIR.

#### WATER QUALITY (Section 4.13)

- Many water quality standards not listed in Table 4.13-1 also apply to surface water and groundwater potentially impacted by the project.
- The DEIR only minimally addresses potential groundwater quality impacts, focusing on impacts from the proposed septic system. The DEIR focuses on impacts to surface water by suspended particulate pollutants, but neglects dissolved pollutants such as oils and others potentially released from asphalt debris. Dissolved pollutants generally have greater potential to migrate through the unsaturated zone to groundwater than do suspended particulate pollutants. Such potential groundwater impact should be addressed by the DEIR.
- The possibility of Salinas River sediment pollution at the site by mercury and other metals from the upstream Rinconada Mine is not addressed. Potential environmental impacts of producing water from such potentially polluted sediments are not addressed.

The Rinconada Mine is an inactive mercury mine roughly 10 or 15 miles upstream of the site. It was founded roughly 100 years ago or more and was worked for decades thereafter. The Rinconada Mine drains to so-called Mine Creek, which flows to a Rinconada Creek tributary, which flows to Rinconada Creek, which flows to the Salinas River. Inspections and sampling over the last 20 years revealed mine waste rock up to possibly 6 feet thick forming primary surface receiving water channel up to possibly 1 mile or more downstream of the mine. Samples of the Rinconada Creek tributary bank contained excessive mercury and other metals.

There is a reasonable potential for such polluted sediments to have been transported downstream to the proposed Las Pilitas Quarry section of the Salinas River by natural

river flow over the many decades of sediment residence in the riparian system. This potential environmental impact should be addressed by the DEIR.

GEOLOGY (Section 4.6)

- The potential for significant clay content within more weathered portions of the granite resource is not addressed by the DEIR. The presence of appreciable clay could impact economic viability of the resource, and could contribute to surface water pollution by suspended fine clay particles that might not be retained by typical stormwater filtering devices.
- The potential for site blasting creating instability and motion along potential discontinuities within site granite is not addressed by the DEIR. Site granite is expected to be fractured to varying extents. The potentially active Rinconada Fault is in the site vicinity, and unmapped small subsidiary faults potentially extend onto the site. Such discontinuities could contribute to slope failure and other ground motion potentially triggered by site blasting.

CONCLUSION

The above issues indicate the DEIR does not thoroughly evaluate all potential environmental impacts of the proposed Las Pilitas Quarry.

Please contact me at the letterhead address for additional information and with responses to these issues.

Sincerely,



David Schwartzbart