Section 4.3 Air Quality Comments

The accuracy of Section 4.3 is affected by numerous deficiencies originating in other sections of the DEIR.

<u>The following are among the deficient assumption values that will affect the ability to accurately calculate air quality impacts:</u>

<u>Trip Generation and Truck Traffic (2.3.3)</u>

• As discussed in Section 2.0 and others, the 50 percent backhauling assumption used to calculate additional trucks associated with the importation of PCC and AC pavement for recycling is not supported by data from comparable operations in the DEIR.

• Although the applicant "believes" that all trucks associated with the "recycling" facility, being sought through a waiver to Land Use Ordinance 22.30.380, will arrive with concrete and asphalt and will leave with aggregate, the sequencing of construction projects would not seem to support that assertion.

• Accurate assumptions (quantification) of the amount of material being hauled into the facility for crushing is fundamental data necessary for generating reliable trip counts.

• Accurate air quality impacts associated with project generated truck traffic cannot be determined until fundamental background data has been accurately identified and provided.

<u>Average or reasonable worst case truck trips</u>

• The average number of trips has been the value applied for study.

• It is generally agreed that there may be very few trucks on certain days or weeks, but that an average will yield certain times when many more trucks than average will be present.

• Pg. 2-9 of the DEIR states that up to 800 truck trips per day may be anticipated for a large project.

• Will air quality conclusions be affected by whether the truck trips come in large concentrations or are averaged?

<u>Total Site Disturbance</u>

• Total site disturbance assumptions associated with mining operations, processing areas, storage piles, facility maintenance, and other needs appear to be understated if other quarry operations visited provide any indication.

• The concern is that utilizing unverified assumption values has potential to undermine accurate and meaningful review of a variety of impacts.
• Provide comparable field data from other similar quarrying operations to substantiate the site disturbance assumptions being utilized.
• Not identifying all components of an entire project constitutes piecemealing under CEQA.

Portable Crushing Equipment

• The use of portable crushing equipment (pg. 2-5) is not typical for large scale (500,000 annual tons proposed) fixed quarry operations. Among the questions this raises:

1. Is the Portable Equipment Registration Program of the California Air Resources Board more or less restrictive than what would be required under SLO County APCD guidelines?
2. Will the "anticipated" maximum use periods be fixed quantities or will they be determined by "market demand"?
3. Will it be possible to accurately predict the AQ impacts of a loosely defined fluctuating use period?
4. Will it be possible to enforce mitigation measures without vaguely defined use periods anticipated?

2.3.2 Equipment Inventory

• The estimate of the heavy equipment that will be used in the project (2.3.2 Equipment Inventory) does not appear to be consistent with the objective of extracting 500,000 tons per year.
• No methodology or background for how the equipment list was developed has been provided.
• Meaningful review depends on the use of reasonably foreseeable assumption values.
• Provide comprehensive inventory lists from other similar quarrying operations.

•A number of or reflect commonality with other maps found in other areas of the DEIR. While Residences in the Project Vicinity (Figure 4.8-1) and Changes in Sound Level showing the closest residences (Figure 12 within Noise Analysis prepared by Dubbink Associates) identify the same five receptors as each other, they similarly downplay the existence of residences. Our DEIR comments will include corrected mapping illustrating more than 25 additional residences that should have been identified. We maintain that whether or not a parcel owner has publicly voiced concerns should have no relationship to their sensitive receptor status.

Air Quality Receptors (AQRs Figure 4.3-1)

• Accurate mapping of sensitive receptors has not been provided in the DEIR.
• 4.3-1 suffers many of the same deficiencies found in Figure 12 of Section 4.8.
• 4.3-1 does appear to identify the receptors located adjacent to proposed quarry but fails to recognize additional receptors. Parcel 070-142-016 is likely the closest receptor for AQ impacts.

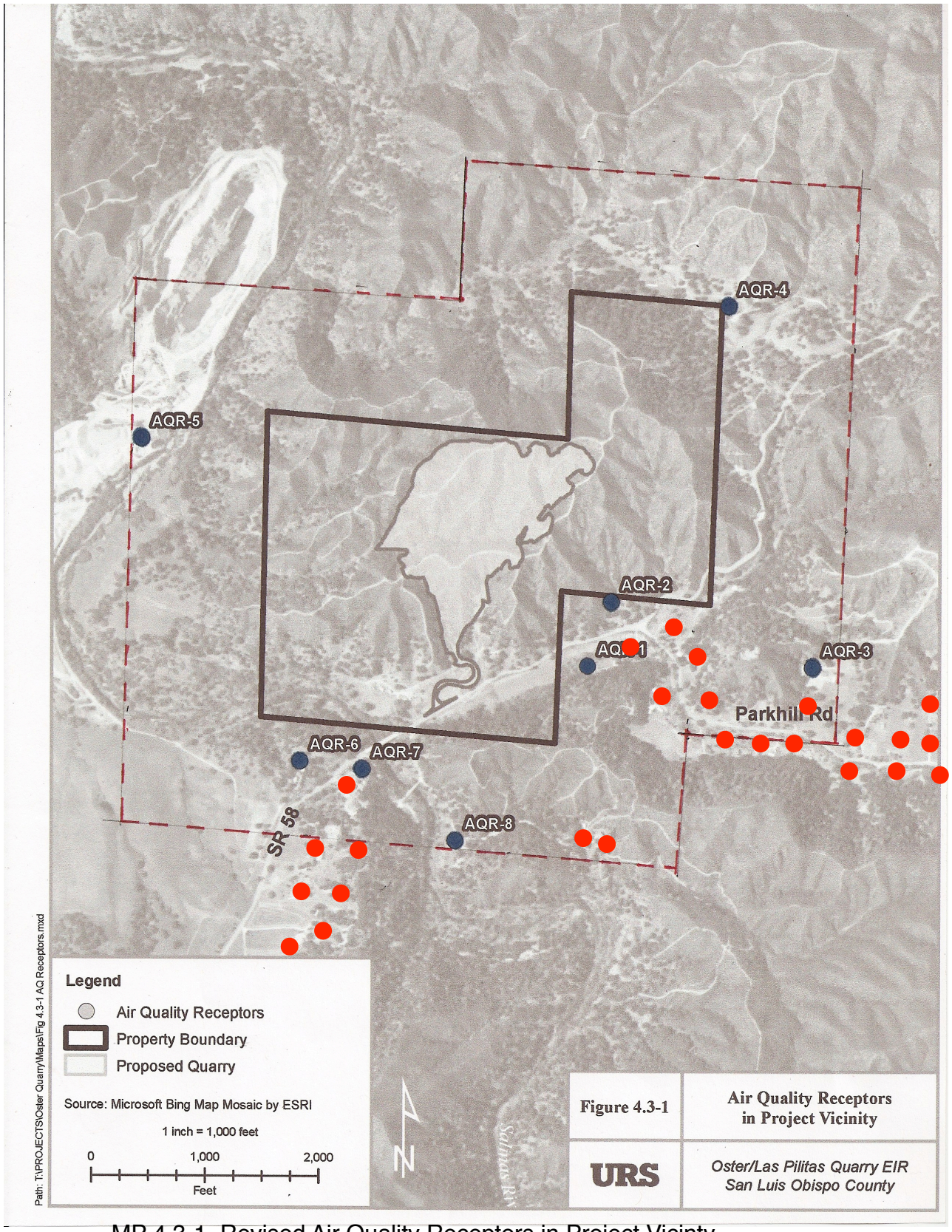
• Mapping showing the the boundaries of parcels 070-141-070 and 070-141-071 with a line around the perimeters at 1000' out has not been provided.
• Preliminary revised mapping suggests a far greater number of sensitive receptors.
• Unless 1000' represents a boundary that meteorological and atmospheric conditions are unable to penetrate, the number of sensitive receptors continues to grow in the RR areas of Parkhill Rd. and Digger Pine Road.
• Additionally, many of the receptor parcels have ministerial entitlements for secondary dwellings not yet exercised. This eventuality further increases the number of nearby homes.
• The health of many families is at risk. This should not be considered insignificant.

Valley Fever Mitigation Measures are inadequate
• Potential exposure to valley fever (Impact HAZ-7) appears to rely on MM AQ-1b.
• While an AQ MM could potentially simultaneously mitigate for a Hazard, the measures must be defined separately to be effective and enforceable independent of one another.
• MM AQ-1a is not sufficient to achieve either goal.

Silica Dust
• The presence of silica dust and potential risks of silicosis appear to have been left un-addressed in the DEIR despite being raised by several residents nearby to the proposal in scoping letters.
• How has the presence of silica dust been addressed and mitigated in the DEIR?

Cancer Risk
• Figure 4.3-1 and Table 4.3-3 describe the increased cancer risks for receptors near the project.
• Exactly how will the proposed mitigation measures reduce the cancer risk to less than significant.
• The presence of increased cancer risks poses serious long term health risks to nearby residents.
• Further clarification, development, and complete mitigation of this impact must occur.

Mitigation Measures Proposed
• The air quality impacts are understated due to flawed or inaccurate input data and need to be revised accordingly.
• The mitigation measures throughout this section are inadequate relative to the severity of impacts associated with air quality as currently described. Their inadequacy increases without revisions reflective of the actual impacts yet to be identified.



MP 4.3-1 Revised Air Quality Receptors in Project Vicinty