Section 6.0 Project Alternatives Comments

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6.1 INTRODUCTION

The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

Comments

• No explanation of what is being considered feasible has been included. For example, if a project alternative is located on private property without possibility for acquisition of necessary easements, rights, etc., is an alternative in that location considered feasible?
• Project alternatives that are not or were never feasible fail to constitute a reasonable range of alternatives.
• Far more thorough and detailed discussion of what measures have been taken to determine the feasibility of the project alternatives presented needs to occur.

pg. 6-1,2

6.2 BASIC PROJECT OBJECTIVES

Comments

• Project alternatives are required to meet project objectives.
• Basic project objectives are at odds with one another.
• While the desire to protect existing adjacent uses is stated in objective A, the desire to protect significant mineral resources from land uses that threaten their availability (objective B) is opposite.
• What strategy is being utilized to simultaneously achieve contradictory project objectives?
• Why is the fundamental and most basic project objective as summarized in the application for LLC by Las Pilitas Resources, *"to develop and produce rock products for investment and production of income"*, not included in the project objectives?

pg. 6-4

6.5 NO PROJECT ALTERNATIVE

Comments

• Although the No Project Alternative *would not fulfill the specific project objective related to producing 500,000 tons per year of aggregate material for use in the local development and road construction and maintenance sector,* the need for additional aggregate sources within the production-consumption region has not been adequately proven.

Evaluation of need for additional aggregate

1. Analysis used to predict future aggregate needs is based on projecting a peak construction period over a future period of time. This methodology fails to account for drastic economic downturns occurring since 2006. Predictions of economic recovery have proven to be inaccurate since that time. The economic downturn, possibly not yet fully realized, will likely result in even further decreases in aggregate demand for some years to come.
2. *"As with many forecasts of economic activity, those generated for this report should not be viewed as offering unqualified predictions of the future. The forecasts in this report are based on assumptions that the data used is accurate, and that the economic and urban development trends of the past three decades will continue for the next five decades."*[1]
3. Several existing large scale quarries currently operate at production levels below their permitted volumes.
4. The amount of available material existing is substantially underestimated by only taking inventory of currently permitted resources. Many existing quarries have resources far beyond their currently permitted levels and at least one large local quarry within this sector, Santa Margarita Quarry, has made application to expand production. Those levels are not accounted for in future supply forecasts.
5. The proposed Oster/Las Pilitas Quarry has stated they will only be taking business from existing suppliers. By their own admission, no new need exists: *"The project is contending that it's own operations will likely remove Hanson trucks while replacing those with project trucks, resulting in a net balance of current quarry related traffic."*[2]
6. Geographic inequity is an additional consideration in areas where potential for multiple mining operations to locate in close proximity to one another exists. The need for aggregate must be balanced against the cumulative environmental degradation and loss of rural character to industrial that multiple operations present to existing communities.

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[1] Ca. Dept. of Conservation , SR162-Mineral Land Classification (Russell V. Miller, Judy Wiendenheft Cole, John P. Clinkenbeard)

[2] Pg. 1 Traffic Impact Study for Las Pilitas Rock Quarry prepared by Walter Hutcheson, TPG Consulting

Suitability of Transportation Corridor

1. Mining is transportation based and depends upon access to safe and suitable industrial transportation corridors.
2. Pro-active network and corridor planning is essential to achieving safe pathways for commerce.
3. Formal corridors are planned and built specifically for expanding needs.
4. Functional corridors represent flows along an existing infrastructure. These often become operational reality by default before determination of suitability or functionality.
5. The safety of all users of the corridor MUST be considered prior to determining the suitability of a corridor.
6. The large scale mining operations (Hanson and Rocky Canyon) are much more favorably located in relation to accessing transportation corridors suitable for intensive industrial activity than would ever be possible to achieve in the location Las Pilitas Resources currently proposes.
7. The currently identified haul route (Hwy. 58) is a narrow, shoulder-less rural route with limited lines of sight related to topography, yet is being considered to serve as a busy industrial transportation corridor for up to the next 58 years.

- Hwy. 58 is a California Legal Yellow Advisory Route beginning at J Street in Santa Margarita.[3]
- Hwy. 58 from Santa Margarita urban reserve line to the Kern County line is listed under Suggested Scenic Corridors for the candidate roads and highways.[4]
- Structure 49 0237, the 323' long Salinas River Bridge, classified as a minor arterial (rural) route, has an operating rating of 59.8 tons. Given the constraints of the haul route and proposed access into the project, it is reasonably foreseeable that this rating would be routinely exceeded by industrial activity requiring large numbers of trip cycles utilizing trucks 65-72' in length loaded to the legal capacity of 80,000 lbs.

• The geographic inequities and cumulative impacts associated with operating yet more quarries in this area far outweigh any benefits to the local economy. The material produced will not stay local because there is already a surplus in the local market.
• The No Project Alternative is the only truly effective mitigation measure.
• We strongly support the No Project Alternative for the specific location of this project proposal and agree with the conclusion within 6.6.1 that *expansion of the existing quarries may be considered in conjunction with the No Project alternative at the Oster family property, and would thus avoid the impacts associated with this project. It may also be reasonable to consider expansion of existing quarries as a way of delaying the proposed project and its accompanying effects for some time.*

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[3] State Truck Networks Map, California Department of Transportation

[4] SLO County Open Space Element, Visual Resources Table VR-2

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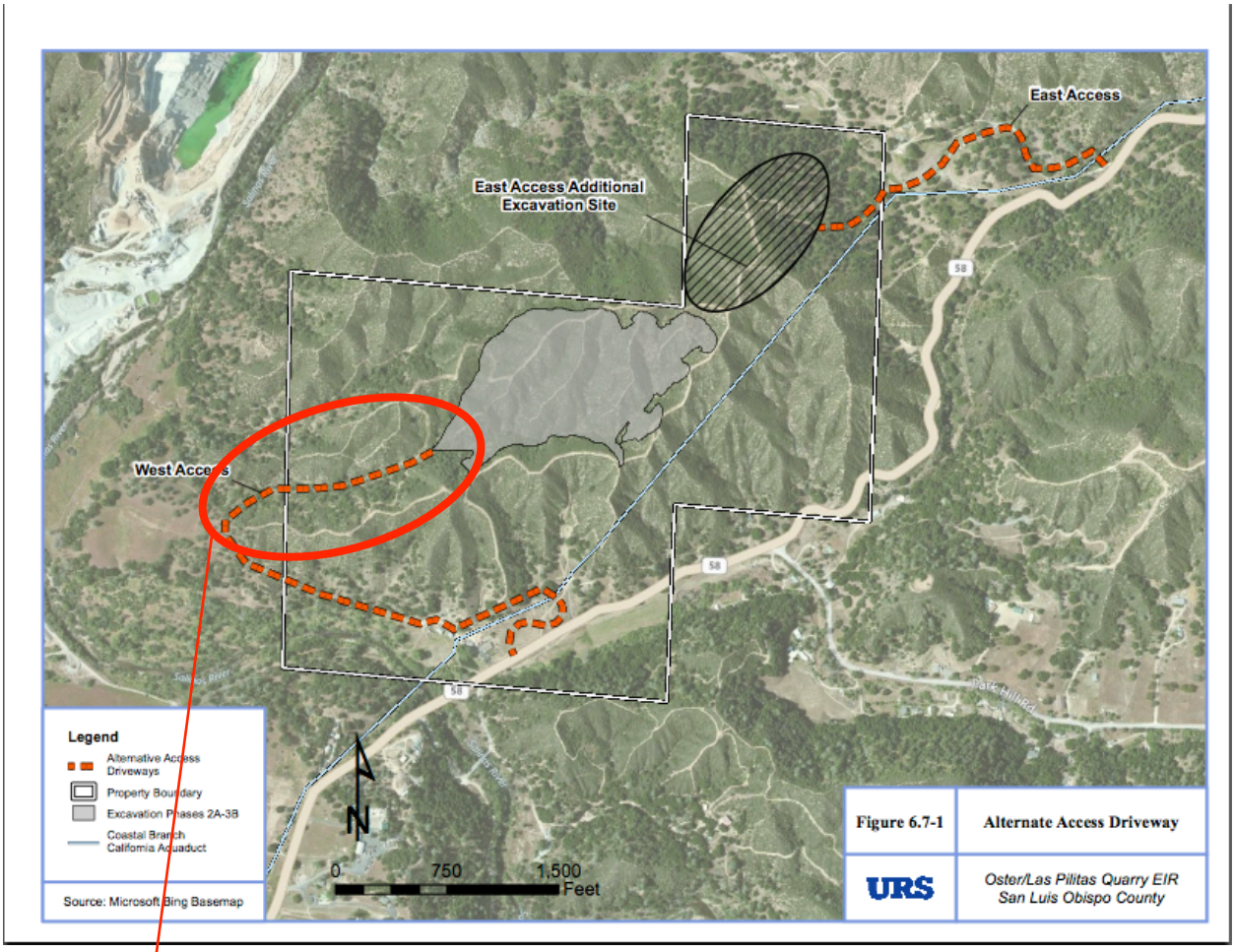
6.8 ALTERNATIVE ACCESS ROUTE TO SR 58 VIA HANSON QUARRY

Comments

• While it may be true that *some of the identified noise impacts of the project associated with truck traffic through residential neighborhoods and the school zone along SR 58* would be mitigated by using this alternative, far more impacts are introduced in other areas.
• This alternative compounds the safety impacts that are the major concern with the use of Hwy. 58 through one of the many dangerous sections of the roadway (PM 4.6 thru PM 5.08) and likely beyond.
• The need for a left-turn lane would remain present at the proposed project entrance while the need for a right hand turn shoulder would be created at the private road providing access to a residence and jeep access into the back of Hanson Quarry.
• The Coastal Branch of the California Aqueduct would need to be crossed at this location.
• Noise, air quality, and aesthetic impacts are significantly increased for the concentration of residences, most all of which are at higher elevations on Digger Pine Rd.
• We are not supportive of any alternative route that utilizes Hwy. 58.
• Figure MP6.0-1 as an example of an alternative route worthy of community review if properly designed and subjected to an environmental review process that ensured public comment was incorporated into any final outcome.

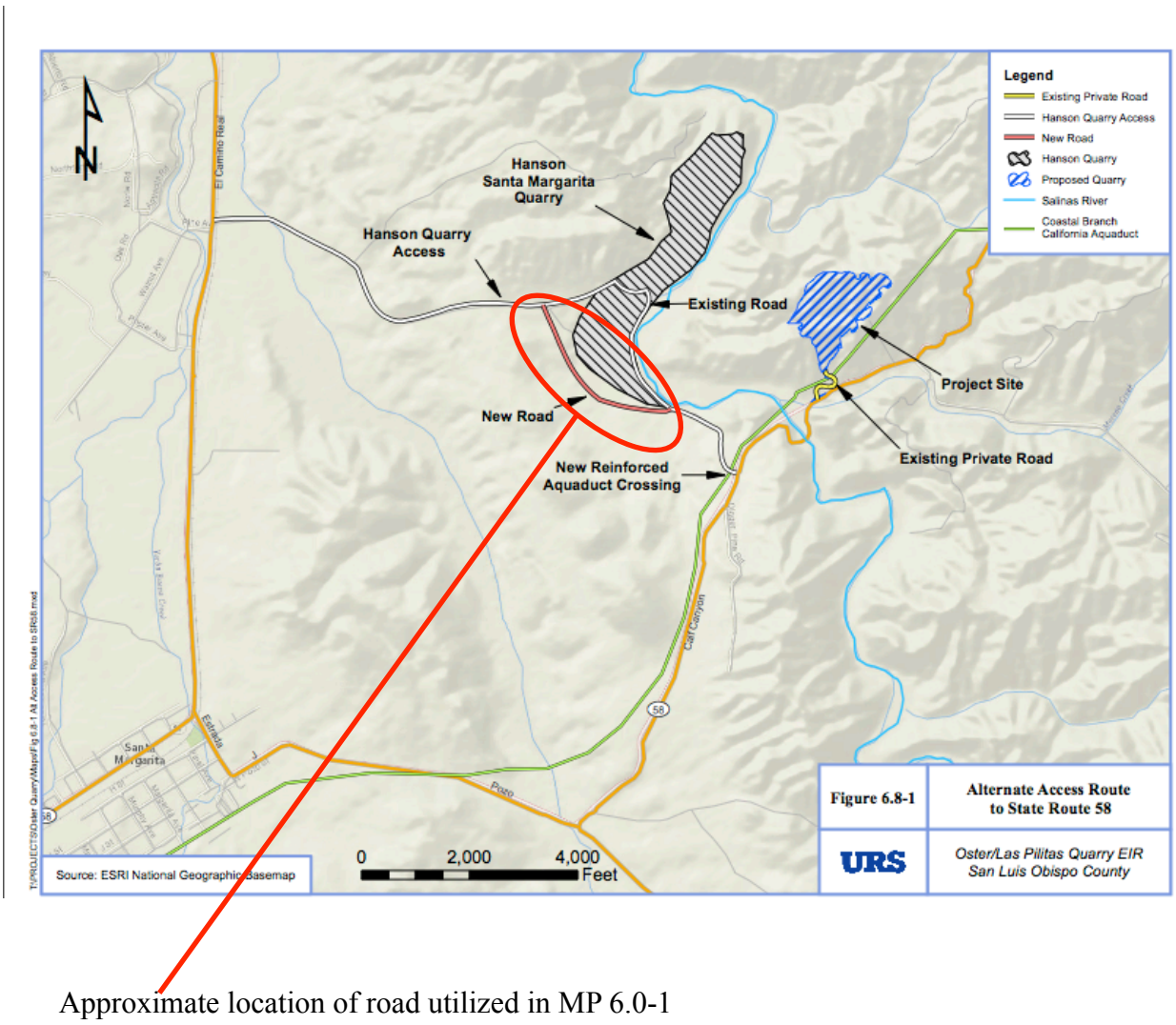


Portion of 6.7-1 utilized in MP6.0-1

<u>Comments</u> *Figure 6.7-1*

• This alternative may possibly mitigate some of the more severe noise impacts associated with the currently proposed access into the quarried area depending on how deep the road were cut in. If the existing benching were maintained, the road would enter the quarried area at the bench elevation of 1150', 50' higher than currently proposed. This likely increases the steepness (grade) of the road.

• The remainder (not circled) portion does nothing to lessen impacts present in the original proposal and still relies on Hwy. 58 to function as a suitable industrial transportation corridor, a solution we find unacceptable as previously stated.



Approximate location of road utilized in MP 6.0-1

<u>Comments</u> *Figure 6.8-1*

• Existing Private Road appears to be the currently proposed access driveway.

Figure MP 6.0-1
An Alternative Access Route

- - -New road 1. Private bridge over Salinas River 2. Junction to existing Hanson access.
Suggested alternative *Figure MP6.0-1*

- Utilizes elements of already considered pathways.
- Makes same feasibility assumptions as URS has regarding access easements.
- Requires private bridge over Salinas River.
- Figures MP6.0-2 thru 4 provide examples of some river crossings.

Figure MP 6.0-2 on access route to Rocky Canyon Quarry

Figure MP 6.0-3 on access route to Rocky Canyon Quarry

Figure MP 6.0-4 Private bridge over Salinas River at Santa Clara Rd. in South Atascadero

Additional Comments Section 6.0

• Alternative transportation options must be carefully considered if the environmentally superior option, the No Project Alternative is not chosen.
• The feasibility of alternative transportation options must not be measured in dollars.
• It is unacceptable to apply any metric to "feasibility" other than the public health, safety, and welfare.
• The community does not support subsidizing a private business enterprise proposing a use of publicly maintained, taxpayer funded roadways that compromises the structural integrity of public infrastructure and the future safety of all other users of the roadway.