

October 21, 2010

Mr. Jeff Oliveira, Project Manager
San Luis Obispo County
Department of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, California 93408-2040

SUBJECT | **REVISED PROPOSAL FOR THE LAS PILITAS QUARRY EIR**

Dear Mr. Oliveira:

Thank you for providing Benchmark Resources the opportunity to submit a Revised Proposal to prepare an Environmental Impact Report (EIR) for the proposed Las Pilitas Quarry Conditional Use Permit & Reclamation Plan. We have reviewed the comments in your October 15, 2010 memorandum and are providing the enclosed Revised Proposal for your consideration. Below is a summary of the key changes we made to the proposal to address your comments.

General Comments

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Regarding peer review, we agree with the County that a critical first step in the environmental review process is strenuous review of Applicant-prepared studies. Our experience is that while the studies are often prepared by experts and are well-intended, they are seldom satisfactory without revisions, and sometimes require either major revisions or need to be augmented by independent analysis. A tool we will use when conducting peer reviews of applicant-prepared studies is our Memorandum of Review form. We have provided an expanded discussion of our peer-review process in our Task 2 Scope of Work discussion. A copy of the form is included as Appendix D to the Revised Proposal. We have found that the use of the form gives our lead agency clients a clear understanding of the rigor with which the Benchmark Resources team has evaluated applicant-prepared technical studies. The use of the form for this project will enable us to communicate our review to the County, identify any deficiencies with Applicant technical studies and provide recommendations to the County with regard to the manner in which the information can be used or may need to be supplemented to complete the analysis necessary for the EIR. This format of peer review documentation also provides a useful tool for the County to subsequently convey the peer review findings to the project Applicant.

Aesthetics

We have revised our proposal to include a more detailed discussion of the approach to the aesthetic/visual resources analysis and to include the preparation and use of visual simulations for conducting the viewshed analysis. In summary, we will identify up to five representative viewpoints from which views toward the project occur and would have the greatest potential for visual impacts. We will photograph views from these locations and will prepare cross-sectional profile drawings to determine the vertical interface of project facilities within viewshed and will prepare photographic simulations to illustrate the visibility of project facilities and other project effects on the landscape as viewed from each of the representative viewpoints. The visual impact analysis will consider the existing quality of the views, the sensitivity of viewers and the degree of change to the view that will occur as a result of the project.

We agree that aesthetics is a key issue for this Project. Indeed, aesthetics is often a key issue with hard rock mining as the reserves are generally located on hills or mountains that increase the visual sensitivity of the Project area. High profile aesthetics impacts are a major component and concern for most of the hard rock mining projects we have worked on. We believe that accurate and detailed visual simulations, prepared with the assistance of advanced computer graphics, give the public and decision-makers an

excellent idea of how the Project will impact visual resources in the area from key public viewpoints. For instance, for the Jesse Morrow Mountain Project in Fresno County, we prepared photographic simulations forecasting the visual impacts of a 100-year phased mine on a mountainside along State Route 180. Aesthetics is the most controversial aspect of that project. In the Draft EIR, we required mitigation measures to reduce the impacts and worked with the County and Applicant to redesign the Project phasing and benching, which helped reduce the impacts as well. Nonetheless, we determined that the impacts were significant and unavoidable for that particular project. We have included the Jesse Morrow Mountain Draft EIR's Aesthetics Section for your review, which provides examples of photographic simulations from key view point locations, in Appendix C of the Revised Proposal, and can provide examples from other EIRs upon request.

Air Quality

Like Aesthetics, Air Quality is often a key issue for mining projects when it comes to adequately evaluating environmental impacts and addressing public concern. We have, therefore, associated ourselves with a preeminent expert in air quality evaluations. In preparing our air quality scope of work for this project, we reviewed all publicly available documents, particularly the August 3, 2010 San Luis Obispo APCD comment letter, the public scoping and NOP comments, and the recent guidance regarding applicable modeling in the December 2009 County of San Luis Obispo APCD CEQA Air Quality Handbook. We believe our scope of work ensures that the air quality analysis for this Project, which includes an evaluation of greenhouse gas emissions, will appropriately and thoroughly evaluate the Project's potential impacts to air quality, using defensible thresholds and methodologies, and taking into account specific regional considerations for air evaluations as discussed in the SLO APCD Air Quality Handbook. We have provided a detailed scope of work in the Revised Proposal's Air Quality subsection of Task 2 which further clarifies the budget associated with this section.

Agricultural Resources

Per the County's comments, we have revised the scope of work and cost estimate in this area to eliminate a detailed evaluation of impacts from the conversion of grazing lands. We also updated the cost estimate to reflect a reduced effort. We intend to evaluate potential impacts to agricultural and other land uses on surrounding properties based

on the Project's proposed water use and dust generation, as well as issues posed by invasive weed seed migration as mentioned in our original proposal.

Cultural Resources

We have reviewed our proposed scope of work regarding cultural resources and made a number of revisions. For instance, we inadvertently included a walkover survey in Table 3, which has been deleted. With respect to the National Historic Preservation Act (NHPA) reference, as part of the database search, our archeologist typically searches the National Register which is maintained under the NHPA. We noted that Heritage Discoveries, Inc. did not conduct this search; however, upon further review of the available documents we believe such a search would not be warranted unless new information indicates otherwise. The scope of work and cost estimate includes a peer review and preparation of technical peer review memorandum and does not assume a site visit.

Hydrology, Water Quality and Water Supply

Benchmark Resources and our key subconsultant, EMKO Environmental, have extensive experience evaluating both surface and groundwater hydrological impacts from hard rock mining projects. We have augmented the description of our approach to the Project's hydrology, water quality, and water supply issues in the Revised Proposal's Water Section of Task 2 to provide greater detail on the tasks and analysis we expect to perform, particularly with respect to groundwater supply. We have detailed our approach to include the following subtasks (described in detailed in the Revised Proposal): applicable significance threshold criteria; definition of baseline; description of water use; discharges of surface and groundwater; stormwater runoff; reclamation; and impact analysis and mitigation measure development.

Noise

As with the other resource issues, we have added a narrative explanation of how we plan on approaching this section, including rigorous peer-review of the Applicant's blasting plan and outlining all of the applicable regulations, to ensure that the public has a clear understanding of the Project's noise impacts from blasting as well as noise generated by mobile (on-site and off-site) and stationary equipment. Analysis of issues associated with the blasting will cross over into other resource areas such as Hazards

and Geology. We would like to note that our firm has extensive experience evaluating and mitigating impacts from blasting at a variety of quarries in several counties.

Traffic

Pursuant to the County's request, we have contacted Hatch Mott MacDonald and they have agreed to team with us as the traffic subcontractor for the project and they are included in our Revised Proposal. We previously worked with Hatch Mott MacDonald's Gilroy office when they were Higgins Associates and are confident that Keith Higgins and Jeff Waller will do an outstanding job in conducting the traffic impact analysis for the EIR. The Transportation/Circulation section of Task 2 of our Revised Proposal includes Hatch Mott MacDonald's recommended scope of work in light of the County's comments on our original proposal. The scope of work includes analysis of traffic generation from both the mining operations and the recycling component of the Project, as well as analysis of traffic impacts related to the railroad crossing.

Land Use

We have revised our scope of work to include an evaluation of land use compatibility impacts associated with granting a modification pursuant to Section 22.30.020(D) of the County Land Use Ordinance to allow an asphalt and concrete recycling facility on Rural Lands without an associated waste disposal facility. We also have updated the cost estimate to reflect this additional effort. Many of the mining projects that we have worked on include recycling components that would recycle aggregates from construction demolition work because mining operations already have crushing and processing equipment to process this material, and aggregate recycling is an efficient use of otherwise wasted materials that would consume landfill space. Nevertheless, such projects are often located in rural rather than industrial areas, and zoning and land use compatibility issues must be addressed. Thus, we are experienced in this issue area and are well-qualified to conduct the analysis.

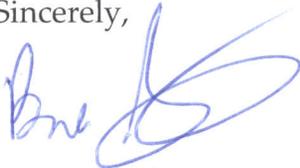
Benchmark Resources Staff Addition

Since our original proposal was submitted to the County, we have added Bob Delp to our staff. Bob is an environmental planner with over 15 years of CEQA and NEPA experience, and we are pleased to be able to offer his services to the County. We have modified the proposal to include Bob as a Senior Planner on the Project, and he will assist with various tasks associated with the environmental review and EIR preparation.

In the Revised Proposal, Bob's resume has been added to Appendix A-1 and we have updated Section 2.2.1 and the organization chart (Figure 2) to reflect his role.

In conclusion, we are excited about the opportunity to provide our EIR preparation services to San Luis Obispo County. As you can see from our proposal, we have worked on most of the hard rock mining EIRs that have been prepared in California during the past decade and we would like to continue our dedicated services to lead agencies with the preparation of the Las Pilitas EIR. We hope that this letter and our enclosed Revised Proposal answer the County's comments. We welcome an opportunity to sit down with the County to discuss this Project in further detail. Please call or e-mail me if you have any questions.

Sincerely,



Bruce Steubing
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RBS:gcd

Enclosures

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Sincerely,

Bruce Steubing
Principal

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Enclosures

PROPOSAL

1.0 INTRODUCTION

Benchmark Resources is a multi-disciplinary environmental planning firm specializing in environmental analysis and permitting services, specifically as they relate to mining and associated environmental resources and projects. Our primary areas of expertise include resource and land use planning, public participation and lead agency staffing services, environmental impact analysis, environmental monitoring and compliance, mitigation monitoring, and mining and reclamation planning. The manner in which we complete these services benefits the common interests of both agencies we serve and various industries. Our philosophy for this work is to reach permitting solutions through public-private collaboration and professional participation.

As a specialized planning and environmental consulting firm that is focused on mineral resources, the environmental consequences of mining, and compliance with the SMARA and other applicable statutes and regulations, Benchmark Resources has a proven history of preparing successful environmental impact evaluations, preparing and reviewing permitting applications and reclamation plans, and assisting agency staff in application processing for all types of mining applications throughout California. We have prepared environmental impact evaluations under the CEQA on precious metal, industrial minerals, and aggregate mines, including some of California's largest and most controversial mining projects.

Benchmark Resources staff have been assisting public agencies at the federal, state, county, city, and local levels fulfill their EIR documentation and processing needs for

over 30 years. Our relationships span over 60 agencies statewide, with ongoing service in nearly 40 counties (see Figure 1, Representative Statewide Mining Experience). Our staff is led by senior-level individuals with long-term experience in mine and reclamation permitting, environmental resources, regulatory compliance, and project development. We thoroughly understand the objectives of agency staff and decision-makers and our role in assisting them. The Benchmark Resources staff has an extensive record of success for the preparation of environmental documentation on mining projects, which are typically “high profile” projects that are often challenged by opponents. We pride ourselves in providing agency confidence in the permitting process through the consistency and reliability of our work. In addition, our experience supporting Lead Agencies in completing as many as 150 SMARA inspections annually provides insight into the feasibility of conditions of approval and mitigation measures.

Benchmark Resources is comprised of staff that are highly regarded experts in CEQA compliance and mineral resource planning. The Key EIR Project Director and Principal, Bruce Steubing and David Brown, have over 40 years of cumulative experience working in the environmental planning business. Bruce Steubing, who will serve as the Project Director on this EIR, is an environmental land use attorney with over 16 years of experience. Resumes are provided in Appendix A-1, Benchmark Resources Resumes.

2.0 PERSONNEL AND EXPERIENCE

2.1 Benchmark Resources Team Overview

The preparation of an EIR for a hardrock aggregate mining operation of this magnitude is a complex task. Consequently, the EIR must address a broad range of concerns, each at a level of analysis commensurate with the anticipated severity of impacts and the likelihood of occurrence. Benchmark Resources has extensive experience with the environmental issues involved in mining projects, environmental review documentation, and compliance with the California Surface Mining and Reclamation Act (SMARA). Our experience with the anticipated “hot button” issues of greenhouse gases and air quality in general, hydrology, traffic, aesthetics, and biology resulting from the Project will facilitate our ability to “hit the ground running” if selected as the EIR consultant. Benchmark Resources is committed to assisting County staff throughout the EIR process to ensure consistency with the requirements of all applicable state law, specifically CEQA and SMARA, and preparing legally defensible environmental documents to the Planning Commission and Board of Supervisors.

Benchmark Resources’ objective is to assist San Luis Obispo County (County) with the preparation of an Environmental Impact Report (EIR) that complies with the California

Environmental Quality Act (CEQA), and meets local and regional planning policy requirements. Benchmark Resources seeks to prepare, by contract with the County, an EIR that meets the legal requirements of a complete, adequate, unbiased, and objective document that evaluates the proposed Las Pilitas Quarry Project (Project). The function of the EIR will be to serve as an informational document for the Project proponent, for the public, and for County decision-makers.

Benchmark Resources has organized a team of managers and technical support to conduct the range of tasks necessary for the Las Pilitas Quarry Project. Given that our specialty and practice focus are mining projects, we use the services of subcontractors experienced in mining issues and with whom we have long-term established relationships. With a few exceptions, we have maintained this approach for the Las Pilitas Quarry Project and utilized predominately the same subcontractors that performed technical evaluations for most of the environmental documents prepared by our Benchmark Resources team.

We are confident in the ability and experience level of our staff and subcontractor technical experts to prepare industry standard technical studies and provide peer reviews of studies and plans submitted by the Applicant that will withstand the test of public scrutiny that typically accompanies mining EIRs. Table 1, Key EIR Team Personnel, provides the name of the firm and primary contact for the Project.

**TABLE 1
KEY EIR TEAM PERSONNEL**

Firm	Primary Contact
Benchmark Resources	Bruce Steubing
EMKO Environmental (Hydrology)	Andrew Kopania
Golder Associates (Geotechnical and Air Quality)	Ken Haskell (Geotechnical) Brian Patterson (Air Quality)
Bollard Acoustical Consultants (Noise)	Paul Bollard
Hatch Mott MacDonald (Traffic/Public Safety)	Jeff Waller
Berryman Ecological (Biological Resources)	Ellen Berryman
Analytical Environmental Services (Cultural Resources)	Melinda McCrary

2.2 Key EIR Team Members

Benchmark Resources will provide the lead role in EIR preparation, and will assure CEQA compliance and technical adequacy of the EIR. Our staff members have worked

together in the same or similar roles for other mining EIRs and EISs. Figure 2, EIR Team Roles and Duties, is an organization chart showing key team members and their responsibilities. The organization chart provides the specific responsibilities of the key personnel along with the anticipated total effort, expressed in percentages of effort to be provided by each member of the Project team. A summary on each of the Benchmark Resources key team members is provided below.

2.2.1 Benchmark Resources Team Members

Bruce Steubing – Project Director

Mr. Steubing, a Principal of Benchmark Resources, has over 16 years of experience as an attorney and Project Director, specializing in the preparation and processing of environmental documents and lead agency staff services. He is responsible for the preparation and approval of countless environmental documents (EISs and EIRs) for large, complex, and controversial projects. These projects have resulted in experience in a wide range of development projects including mining, oil pipelines, industrial, commercial and residential developments. Mr. Steubing manage projects requiring preparation of technical documents, development of mine plans, and formulation of strategies for legal, environmental, and permitting compliance. He is Benchmark Resources' specialist in regulatory compliance and permitting for mineral resource development acting as contracted lead agency planning staff.

As Project Director for the preparation of the EIR, Mr. Steubing will oversee every aspect of the Project with his typical tasks and duties including, but are not limited to:

- Main County contact and overall director of EIR program and strategy development
- Review and become familiar with planning and environmental documentation, maps, and other aspects of the Las Pilitas Quarry Project;
- Coordinate with County Staff in the organization of field trips and workshops for public and decision-makers;
- Contact and coordinate with subcontractors and County Staff for necessary environmental baseline and peer review of Applicant prepared technical evaluations;
- Primary contributing author/editor of the Administrative Draft and Draft EIR, consistent with State law, San Luis Obispo County requirements, and any other governing law;

- Development and refining of mitigation measures for the Project as provided by County Departments and other agencies;
- Review agency and public comments received on Draft EIR and primary author/editor of the Administrative Final EIR and Final EIR Response to Comment;
- Participate in meetings with County Staff and Applicant; and
- Attend and present EIR at public meetings.

Andrew White – Project Manager

Mr. White has prepared and reviewed numerous environmental documents on a variety of complex and difficult mining projects. He has managed projects requiring preparation of technical documents, mine and reclamation plans, permitting and environmental documentation, and performed Lead Agency permitting, as well as environmental and land use assistance throughout the state. He has also developed expertise in CEQA issues through previous employment at the California State Resources Agency where his regulatory knowledge was applied to updates of the CEQA Guidelines.

As Project Manager for the preparation of the EIR, Mr. White will be involved in all aspects of the Project assisting the Project Director, including:

- Review of and familiarity with Applicant-supplied technical documents, Project Description, Reclamation Plan and applicable County policies;
- Review and agency and public comments on Draft EIR and assist in drafting of response to comments for Final EIR;
- Assist in preparing for and attending meetings and hearings; and
- Quality control and manager for word processing and document production/preparation.

Bob Delp – Senior Planner

Mr. Delp has seventeen years of experience conducting resources analyses, preparing environmental documents and managing environmental planning and review processes. He prepares environmental documents for compliance with CEQA and NEPA for water resources, transportation, energy infrastructure and industrial projects. Mr. Delp also manages and conducts environmental review for advance planning activities including those associated with water resources, transportation, land use and recreation.

Mr. Delp will be involved in several aspects of the Project assisting the Project Director and Project Manager, including:

- Assist in coordination with technical subconsultants and County staff in preparation of technical evaluations;
- Contributing author/ editor of the Administrative Draft and Draft EIR and review of subcontractor-prepared EIR sections; and
- Review and agency and public comments on Draft EIR and assist in drafting of response to comments for Final EIR.

David Brown – Principal

Mr. Brown, a Principal of Benchmark Resources, is recognized as a statewide leader in mining consulting, with extensive experience in SMARA, CEQA and NEPA, including almost every type of mining operation (e.g., hardrock quarry, off-channel, surface, in-stream, etc.) in the state. Mr. Brown has been involved with mining projects for more than 25 years and with land use planning for nearly 30 years. He has worked on more than 300 mining projects and has prepared mining documents for more than 40 jurisdictions in California.

As Principal, Mr. Brown will oversee work to be completed by our senior in-house team and technical specialists. He will review the Project Description and Reclamation Plan, take an advisory role in the preparation of the Administrative Draft and Draft EIR, participate in meetings with County staff, and assist County staff with other project management support, as needed by the County.

2.2.2 Subconsultants

Environmental support work for this Project would be prepared by a team of individuals that is highly experienced in the preparation of CEQA environmental impact documentation for mining projects. Subcontractors with which we choose to work are experienced professionals familiar with local environmental conditions. Our team is actively involved in preparing environmental evaluations for other lead agencies and is familiar with working together in preparing such work in an efficient, timely, and technically supportive manner. Subcontractor resumes are provided in Appendix A-2, Subcontractor Resumes.

Traffic

Hatch Mott MacDonald (HMM), is a leading consulting engineering firm with a century of worldwide experience. We offer public and private clients a complete range of services from planning, feasibility studies, environmental assessments, and conceptual design through preliminary and detailed design, to procurement, construction inspection, construction management, and full project and program management services, as well as operations and maintenance support.

HMM offers innovative approaches to servicing the nation's ever-growing transportation infrastructure needs while ensuring preservation of environmental and historic resources. The company has strong expertise in traffic engineering, transportation planning, and project management. They have served in key roles on a wide variety of project sizes, from small subdivisions to many of the largest transportation projects in California.

The firm's experienced transportation, civil engineering and transportation planning staff has provided planning, design, inspection, and construction support services for the construction of new and rehabilitation/replacement of bridges, highways and local roadways. Structures include movable and fixed bridges that carry or cross railroads, highways or waterways. Highway and roadway projects include restricted and non-restricted access highways, highway and local roadway widening and intersection improvements.

Keith Higgins has directed and performed numerous planning and design projects during his 35-year career. He has extensive operational experience, including serving as a city traffic engineer. Specific experience includes traffic impact analyses; conceptual and final highway, street system, and subdivision design; traffic signal design; signing and striping design; transit system planning and design; traffic volume and speed surveys; safety analysis; traffic control device warrant studies; traffic control device inventory; capacity analysis; circulation studies; parking studies; parking facility design; conceptual interchange design; pedestrian and bicycle studies; transportation systems management; transportation demand management; project representation; community traffic committee organization; railroad design coordination; grading and drainage design; structural design; project management; construction inspection; contract administration; and expert witnessing in personal injury and wrongful death litigation.

Jeff Waller has performed numerous traffic analyses for a wide array of projects, including housing subdivisions and shopping centers, project study reports, quarries

and batch plants, and master plans and general plan updates. Mr. Waller has experience performing traffic analyses throughout the greater Monterey Bay Area, plus San Luis Obispo and Southern Santa Clara Counties. He has also performed full traffic signal warrant evaluations, intersection sight distance evaluations, collision history reviews, and parking supply and demand studies. Mr. Waller's specific areas of expertise include traffic impact analyses and project impact evaluation. Mr. Waller is experienced in various traffic analysis software packages, including Synchro and HCS.

Hydrology and Water Quality

EMKO Environmental, lead by Dr. Andrew Kopania and principal of EMKO Environmental, will be the lead Hydrologist for the Las Pilitas Quarry EIR. Dr. Kopania has over 20 years of experience in project management, regulatory agency interaction, and hydrology studies. He holds a doctorate degree in Environmental Science and Engineering, specializing in groundwater. Dr. Kopania is also a California Professional Geologist and a California Certified Hydrogeologist. His project experience includes detailed groundwater studies for aggregate mining projects and for contaminant studies. Mining-related studies included water resource evaluations, monitoring of site groundwater conditions, compliance with waste discharge requirements and other regulatory permit conditions, and evaluation of potential impacts for CEQA analyses. These mining-related studies include existing and proposed hardrock quarries in Madera, Fresno, Lake, Sacramento, Santa Cruz, San Benito, Monterey, and Imperial Counties. Dr. Kopania has worked with the Central Coast RWQCB and was the lead Hydrologist for the Chevron San Ardo Pipeline EIR, located north of the Las Pilitas project.

Geology and Soils and Air Quality

Golder Associates is a global leader in the fields of geotechnical and environmental impacts studies, conducting hundreds of studies, bankable documents, designs, community consultation, construction supervision and major geotechnical and environmental impact investigations in mining conditions around the world. Golder Associates strives to bring innovative solutions with service that is seamless and extends over the life of the mine. Golder focuses on a team approach and provides continuity with long-standing, experienced staff. By building an understanding of their clients' needs and of the specific environments in which they operate, Golder developed integrated global teams with unique expertise offering Ore Evaluation Services, Sustainable Development Practices, Mine Waste and Environmental Management, Rock Mechanics, and Waste Technology Solutions. In particular to California, Golder Associates has prepared geotechnical and environmental evaluations, blasting practice

reviews, soil and seismic analysis for some of California largest or most complex mining sites.

Golder has extensive experience managing and conducting environmental impact assessments in support of EIRs and EISs, including air quality assessments, air dispersion modeling, human health risk assessments, emissions inventories, permitting, data management, regulatory review, and visibility analyses. Golder has recently worked on mine-related EIR air quality impact assessments in California include existing and greenfield projects in Fresno, Nevada, Merced, Lake, and Shasta counties.

Biological Resources

Berryman Ecological is a small, woman-owned business owned by Ellen Berryman, a biologist and project manager. She has 25 years of professional biological experience in California. Her expertise is in identifying biological resource issues and developing and implementing conservation solutions. She has a well-rounded background in both the public and private sector with projects involving biological surveys and investigations, designing mitigation strategies, technical writing, NEPA and CEQA compliance, state and federal permitting, and habitat conservation planning.

As an independent consultant, Ms. Berryman has performed biological resource surveys and assessments for projects in many environmental settings throughout California. She has also prepared biological resource sections of CEQA documents for housing development, mining, and recreational projects.

Noise

Bollard Acoustical Consultants specialize in the preparation of noise analyses for the mining industry. In recent years, Paul Bollard has conducted noise and/or vibration analyses for over 50 mining-related projects. Many of these projects included CEQA level of analysis of impacts associated with new mining areas, or expansion of existing areas. Bollard Acoustical Consultants utilize state of the art noise and vibration-measurement equipment and software to quantify and assess impacts related to mining noise and/or vibration.

Cultural Resources

Analytical Environmental Services is a multidisciplinary consulting firm that specializes in environmental impact analysis and the preparation of compliance documentation. The AES cultural resources unit is comprised of specialists who meet

the *Secretary of the Interior's Professional Qualification Standards* for archaeology, history, and architectural history. Our staff has an in-depth working knowledge of cultural resources standards, guidance, and regulations, including Section 106 of the National Historic Preservation Act (NHPA), the National Register of Historic Places (NRHP), the California Register of Historic Resources (CRHR), the California Public Resources Code (PRC), the Archaeological Resources Protection Act (ARPA), and the Native Graves Protection and Repatriation Act (NAGPRA).

Services provided by AES include background and archival research, cultural resource inventories, evaluation of cultural resources, archaeological site testing and data recovery, consultation with Native Americans, governmental agencies, and other interested parties, development of mitigation measures and treatment plans, laboratory processing and artifact analysis, and preparation of research designs, data recovery plans, and inadvertent discovery plans. AES has worked with Benchmark Resources on numerous cultural resource compliance projects for mining and mineral resource extraction projects, including the Power House Mine Project EIR, Lincoln Mine Permitting Project, and Empire Mine State Park Site Characterization and Remediation Project.

2.2.3 Other Staff and Office Facilities

In addition to the key individuals identified above, Benchmark Resources draws from a wealth of other on-staff experience. Staff members available to provide as-needed support for the Las Pilitas Quarry EIR include individuals with mine land reclamation planning and implementation experience, experienced CEQA and NEPA specialists, and a technical writer and editor.

Benchmark Resources' El Dorado Hills office facilities were designed to meet all of the needs of project coordination and management. We employ state-of-the-art computers and maintain up-to-date software (Microsoft Office Suite, Microsoft Project, Adobe Acrobat, AutoCAD, ESRI ARC, Adobe Photoshop, and Adobe Illustrator). We send and receive Microsoft Word, PDF, tagged PDF, and other document formats daily. We are also fully AutoCAD- and GIS-capable.

Our support staff includes highly experienced professional Word Processing Specialists, an AutoCAD/GIS manager, graphic designer, and a Documents Manager, all with exceptional skill levels. This team takes pride in producing professionally written, edited, and organized documents with high-quality graphics.

2.3 Example Projects/Work Samples

Benchmark Resources staff has completed scores of environmental evaluations on mining projects over the past several years. Appendix B, Representative Mine EIRs Summary Descriptions, provides a summary of those Projects, key issues encountered/resolved, key staff (including subcontractors), and status of those projects. This should provide the County the confidence in Benchmark Resources’ wide range of mining and resulting environmental issues and analysis by utilizing problem solving approaches and consistent team members and subcontractors who are experts in their field and mining situations.

Lead Agency contacts familiar with our relevant EIR work are provided in Table 2, Benchmark Resources Lead Agency References. Benchmark Resources understands well our role in providing an impartial, technically accurate and comprehensive EIR work products. Our professional understanding, ability to effectively coordinate with staff in a manner that does not unduly burden them and conflict with their other responsibilities, is essential. In addition, please contact any or all of our references, and inquire about our methods of operation in successfully negotiating the technical, political and other obstacles to keep the EIR process moving to completion in as cost effective and expedient manner as possible.

**TABLE 2
BENCHMARK RESOURCES LEAD AGENCY REFERENCES**

Lead Agency References		
<p>Briza Grace Sholars <i>Planner III</i> 559-262-4454 Fresno County Dept. of Public Works & Planning Development Services Division 2220 Tulare Street, Sixth Floor Fresno, California 93721</p>	<p>Matthew Treber <i>Planner III</i> 559-675-7821 Madera County Resource Management Agency - Planning Dept. 2037 West Cleveland Avenue Madera, California 93637</p>	<p>Taven Kinison Brown <i>Senior Planner</i> 831-755-5173 Monterey County Planning Department 168 West Alisal, Second Floor Salinas, California 93901</p>

3.0 COORDINATION

Benchmark Resources takes an active managerial approach to our EIR projects. This means that we make effective use of meetings, conference calls and email to get direction, resolve issues and report progress. We have budgeted for the meetings

anticipated by the County for this Project. Such meetings and conference calls are typically preceded by an agenda from us, and a follow-up list of action items, responsibilities and timelines. Benchmark Resources, through its experience on similar mining projects, recommends monthly status conference calls or meetings to provide the County an update on current developments, information needs, and document development status.

Effective communication and coordination are key to management of an efficient EIR process. The team typically can involve many people (consultant team, planning staff and management, County Counsel, and sometimes applicant staff and counsel). Email, while immediate and relatively efficient, has limitations, primarily file size, and effective management of multiple versions of documents by numerous reviewers. As a result, Benchmark Resources has begun using Microsoft Sharepoint for EIR projects, as it is a program that provides a single-source website for transfer of all data, communication and document version control, at a single location. An example Sharepoint site for this project can be accessed with the information below:

Address: <https://goto.resourcedesign.biz/sample>

Login: resourcedesign/visitor

Password: new visitor (*please note the space between words*)

4.0 TASKS, TIMETABLE, AND COST ESTIMATES

4.1 Tasks

Based on the scope of work outlined in the Las Pilitas RFP and Benchmark Resources' experience on similar mining projects, we have developed a set of tasks that would provide the Las Pilitas Quarry Project with an environmental document that has analyzed all local and regional environmental issues in a consistent approach with other documents in the area. This approach, through the tasks outlined below, would illustrate the particular environmental impacts of the Las Pilitas Quarry Project while providing a baseline scenario, environmental analysis, and mitigation measures equivalent to the Project's identified potential and significant impacts. In the end, this will provide for a legally defensible environmental document that clearly identifies and addresses County policies, regulatory agency comments, and public concerns.

Given our firm's extensive mining project experience, the following tasks have been incorporated to outline Benchmark Resources' approach to the Las Pilitas Quarry Project:

- Task 1: Project Description, EIR Outline, and Style Guide;
- Task 2: Prepare Administrative Draft EIR;
- Task 3: Prepare Draft EIR;
- Task 4: Prepare Administrative Draft Final EIR;
- Task 5: Prepare Final EIR;
- Task 6: Meeting Attendance, Management, and Coordination;
- Task 7: Mitigation, Monitoring, and Reporting Program (MMRP); and
- Task 8: Findings.

Task 1 - Project Description, EIR Outline, and Style Guide

Draft Project Description

The purpose of this subtask is to prepare the draft project description based on the Applicant submitted CUP and Reclamation Plan Application adequate to meet CEQA requirements. Benchmark Resources will develop the following information for description:

- Regional and site specific location (including maps);
- Statement of Project need and objectives;
- Description of Project's technical and economic characteristics (including Project concept, phasing, facilities characteristics, construction, operation and closure); and
- Required permits and approvals.

EIR Outline and Style Guide

The EIR Outline and Style Guide will demonstrate Benchmark Resources' proposed organization of environmental topics and applicable appendices to the County, as well as its style/format recommendations for the EIR.

Benchmark Resources will closely review all comments and responses received in relation to the NOP previously circulated by County, as well as the public scoping meeting.

In addition to development of a draft Project Description, these comments will further assist Benchmark Resources in determining the necessary scope for the

Administrative Draft EIR. The draft EIR outline will include the following information:

- Environmental resource sections to be included for analysis;
- Thresholds of significance;
- Impact statements for issues identified for analysis;
- Cumulative project lists; and
- Alternatives identified for analysis.

Task 2 - Prepare Administrative Draft EIR

Benchmark Resources will prepare an Administrative Draft EIR that complies with CEQA Guidelines and local land use procedures. Benchmark Resources will analyze the Project objectively and address all significant environmental issues in the EIR. The EIR will specifically address scoping concerns identified by Responsible and Trustee agencies, San Luis Obispo County Department of Planning and Building (and other applicable County departments), and the public. The EIR analysis will focus on establishing the existing Project baseline and degree of change that would occur if the Project were approved.

The objective of this task is to conduct all required assessments and prepare an administrative draft version of the Draft EIR for the County's review that is in conformance with the CEQA statute and CEQA Guidelines, as well as applicable County ordinances, and conventional protocols of the County and various agencies consistent with professional standards. Areas of investigation will include review of all CEQA-required subject matters, and potential impacts identified by the County and raised in comments responding to the NOP.

Review Public and Agency Comments

Benchmark Resources has reviewed agency and public comments submitted in response to the NOP and comments provided at the public scoping meeting. The analysis and issues to be addressed in the EIR (as outlined below) will address these issues to ensure that agency and public comments and concerns are documented and evaluated appropriately. Key issues raised during scoping include concerns with project-related vehicle trips and associated traffic and safety issues, project water consumption and impacts to water availability, air pollutant emissions including exhaust and fugitive dust emissions, loss of biological resources habitat, impacts to the scenic and visual quality of the area

and important viewsheds, effects on storm water runoff and potential flooding or other drainage issues, potential effects on archaeological resources, and Native American tribal consultation. Additional issues raised during scoping, such as effects on neighboring property values and quality of life, may also warrant consideration in the EIR or may warrant consideration by the County through separate evaluations or through the public hearing process. Our scope of work intends to address all relevant environmental issues raised during scoping. We will work with the County to determine whether it will be appropriate for the EIR to address economic and social concerns that may not cause actual environmental impacts.

Environmental Analysis Approach

The environmental analysis will draw from information available from the Revised Initial Study prepared for the project, applicant-prepared technical studies and resource evaluations to be conducted by the Benchmark Resources team. We will address each resource area typically considered in an EIR evaluation (based on Appendix G of CEQA Guidelines as amended in 2010) and additional issues identified in the County's Revised Initial Study for the Project. We will consider individual impact issues based on the CEQA Guidelines Appendix G Guidelines, agency and public comments received during EIR scoping and other issues as necessary to fully evaluate and disclose the environmental effects of the Project.

Our general approach to conducting evaluations associated with each resource topic will include assembling information regarding existing conditions at the Project Site and the regional setting; assembling regulatory information including federal, state and local regulations, ordinances and standards; developing and documenting the specific analytical methods used for evaluating each environmental impact issue including identification of the criteria and thresholds used for determining the significance of each impact; evaluating and documenting each Project-specific impact; identifying available mitigation measures for each significant or potentially significant impact; and, finally, evaluating and documenting the potential for each Project-specific impact to contribute to cumulative impacts.

Resource Topics

Based on CEQA Guidelines Appendix G and the Revised Initial Study prepared for the Project, and in consideration of reasonably anticipated impacts that could

occur as a result of the Project, Benchmark Resources will evaluate the following overarching resource topics for the EIR:

- Aesthetics;
- Agriculture and Forest Resources;
- Air Quality and Greenhouse Gas Emissions;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Hazards and Hazardous Materials;
- Noise;
- Recreation;
- Land Use and Planning;
- Transportation/Traffic;
- Water; and
- Energy Conservation and Fuel Consumption.

Peer Review of Applicant-Prepared Technical Studies

As an initial step in the resource evaluation process, the Benchmark Resources team will conduct a rigorous review of Applicant-prepared technical studies to determine whether the information and analysis is appropriate for use in preparing the EIR or whether supplemental or new analysis is required. The Benchmark Resources team commonly conducts peer reviews of technical evaluations and we understand the pitfalls of relying on information that is incomplete, inaccurate or otherwise not suitable for supporting the analysis necessary for an EIR. We utilize a Memorandum of Review template to provide a consistent method for our team members to peer review technical studies prepared by others and to document that review. Appendix D, Sample Memorandum of Review Template, provides an example of our Memorandum of Review template.

Benchmark Resources will prepare detailed memoranda of review for each Applicant-prepared technical study containing information considered for use in the EIR. The memoranda will be submitted to the County for consideration of our recommendations. Generally, our recommendations will include a combination of determinations finding that 1) the resource analysis and technical report is adequate and contains all necessary information to address the relevant

issue in the EIR; 2) the resource analysis and technical report is adequate and contains some of the information necessary to address the relevant issue in the EIR, but supplemental information/analysis will be required; or 3) the resource analysis and/or technical report does not provide adequate information and new or substantial supplemental information and analysis will be required. Commonly, Applicant-prepared technical reports contain a substantial amount of accurate and useful information, but often require supplemental analysis. Our approach in these instances will be to provide a recommendation to the County with regard to an approach for developing the additional information or analysis necessary for the EIR to facilitate the County's decision of whether to request additional information from the Applicant or whether to assign Benchmark Resources (or other County consultant) with the task of developing the additional information.

Other Sources of Data

In addition to utilizing information from the Revised Initial Study and Applicant-prepared technical studies, when appropriate, Benchmark Resources will make the maximum use of existing data, whether in certified EIRs or existing agency, engineering or scientific studies.

Resource Analyses

Direct, indirect, short-term, and long-term impacts will be identified for each resource. Mitigation measures will be developed to avoid, minimize, rectify, reduce or compensate for significant and potentially significant impacts. Our approach to data gathering, assumptions used in developing the scope and our proposed approach to the analysis for each specific resource analysis is summarized in the sections below.

Aesthetics

Data Gathering: Information necessary for the aesthetics/visual resources analysis will be developed through a combination of a site visit, photographic documentation of the site from representative locations on- and off-site, including any particularly sensitive view locations, review of the County General Plan and Zoning Ordinances for pertinent policies and ordinances pertaining to the Project. View site-line drawings submitted by the Applicant will be reviewed.

Assumptions: Design of mining and reclamation areas and facilities will be available in a digital format (Civil 3D 2010) to facilitate preparation of photographic simulations. Project lighting will be limited to safety and security lighting and no nighttime operations with significant lighting requirements will occur. Supplemental site-line profiles and photographic simulations will be required.

Approach: Benchmark Resources will be responsible for the aesthetics resource section (including a visual inventory map, an assessment of existing visual character, assessment of visual quality criteria, site photographs), and an impacts and mitigation section (including photographic simulations, assessment of the Project's effect on the existing visual character of the area, and consistency with General Plan and Zoning ordinances).

We will identify up to five representative viewpoints from which views toward the Project site occur and would have the greatest potential for visual impacts. We will photograph views from these locations and will prepare site-line profile drawings to determine and illustrate the vertical interface of Project facilities within viewshed. We will prepare photographic simulations from each selected viewpoint to illustrate the visibility of Project facilities and alterations to the existing landscape as viewed from each of the representative viewpoints. The visual impact analysis will consider the existing quality of the views, the sensitivity of viewers and the degree of change to the view that will occur as a result of the Project. Potential impacts associated with light and glare will be evaluated based on the Project night and security lighting proposed by the Applicant (to be described in the Project Description).

We will develop mitigation measures for significant and potentially significant visual and lighting impacts. We anticipate that appropriate mitigation will focus primarily on minimizing impacts during operations through concurrent reclamation and visual screening of the Project site from public view locations and through lighting design that minimizes light spill and corona effects. (An example of our approach to aesthetic impact evaluation, including examples of photographic simulations, is provided in Appendix C, Jesse Morrow Mountain Draft EIR Aesthetics Section.)

Agriculture and Forest Resources

Data Gathering: Information necessary for the agricultural resources evaluation will be assembled through review of the County General Plan and Zoning Ordinances pertaining to agricultural resources, review of the California Department of Conservation maps of important farmlands in San Luis Obispo County, review of information from and discussions with the County Agriculture Department and review of landowner information regarding current and historical use of lands for agricultural purposes and Williamson Act contracts, as may be applicable to the Project site and surrounding areas.

Assumptions: Information regarding land uses on surrounding properties will be readily available. The site does not readily support agricultural uses and impacts associated with conversion from agricultural to other uses will not require detailed evaluation. The County's Agricultural Commissioner will be available to work closely with us regarding this analysis.

Approach: Benchmark Resources will be responsible for the agricultural resources evaluation that addresses state and local standards relative to the loss of farmlands. Impacts will be identified and quantified including existing agricultural uses, potential conflicts or adverse effects on adjacent agricultural lands, and consistency with County ordinances and policies. Mitigation for this Project will be focused primarily on dust and invasive weed control, as well as reclamation and reseeding requirements to facilitate return to existing land uses post-reclamation.

Air Quality

Data Gathering: The San Luis Obispo (SLO) County Air Pollution Control District (APCD) has developed the 2009 CEQA Air Quality Handbook to evaluate project-specific impacts and help determine if air quality mitigation measures are needed, or if potentially significant impacts could result. To evaluate long-term emissions, cumulative effects, and establish county-wide programs to reach acceptable air quality levels, a Clean Air Plan has been adopted (prepared by the APCD). Data gathering will consist of the review of meteorological and air quality data from regional stations, acquisition of specific, equipment-level information from the Applicant concerning project construction and

operation, and consultation with the SLO County APCD. All deliverables produced for this project will be reviewed by both Benchmark Resources and Golder Associates (subcontractor) staff, as well as obtaining general buy-in on the methodologies used by the SLO County APCD.

Assumptions: The Applicant will provide sufficient equipment and operations data to prepare baseline data for the EIR air quality analysis. Processing operations flow and mobile equipment inventory information will be available from the Applicant. Quantitative assessment of alternatives will not be required, and a qualitative comparison of the alternatives to the No Project and Project will be sufficient for the alternatives air quality analysis. Information regarding Valley Fever and with the SLO County APCD regarding criteria pollutants, toxic air contaminants, and the County's position on greenhouse gas issues will be readily available from the San Luis Obispo County Public Health Department.

Approach: Air quality impacts and greenhouse gas emissions associated with the Project will be carefully and completely assessed to meet the requirements contained in the SLO County APCD CEQA Air Quality Handbook (December 2009). Benchmark Resources will retain the services of Golder Associates, Inc. to perform the Air Quality and Greenhouse Gas Emissions analysis. The analysis will address both construction and operation activities, including stationary and mobile source emissions.

The air quality assessment will involve the following:

Air Quality Subtask 1: Develop Emissions Inventory

Proper assessment of the air quality impacts from the project includes development of comprehensive emissions estimates for construction and operation activities.

For construction, primary air emission sources include fugitive dust and tailpipe emissions from off-road equipment, road dust and tailpipe emissions from employee and material delivery trucks. The majority of these emissions can be estimated using the URBEMIS emissions estimation program.

For operations, primary air emission sources include fugitive dust and tailpipe emissions from off-road equipment used to mine and transport

aggregate material onsite; fugitive dust from material processing equipment (crushers, screens, etc.); road dust and tailpipe emissions from product pick-up trucks, recycled material trucks, and employee vehicles, and emissions associated with drilling and blasting activities. These emissions can be estimated using the URBEMIS and EMFAC2007 emissions estimation programs, U.S. EPA AP-42 emission factors, and emission factors from California air quality districts.

For all of the activities listed above, emissions of criteria pollutants, greenhouse gases, and toxic air contaminants (TACs) will be estimated. Diesel particulate matter (DPM) is expected to be a TAC of particular concern.

Emissions of reactive organic gases (ROG), nitrogen oxides (NO_x), DPM, and fugitive particulate matter (PM) from construction activities will be compared to significance thresholds provided in the CEQA Air Quality Handbook. Similarly, emissions of ROG, NO_x, DPM, fugitive PM, and carbon monoxide from operation activities will be compared to significance thresholds.

Air Quality Subtask 2: Assessment of Ambient Air Quality Standards

In accordance with guidance in the CEQA Air Quality Handbook, the SLO County APCD will be consulted to determine if a dispersion modeling assessment of compliance with ambient air quality standards will be required for this Project. If so, the cost estimate in this proposal provides for the inclusion of this task in the air quality impact assessment.

This task would be performed using either the U.S. EPA ISCST3 dispersion model with screening meteorological data or the U.S. EPA AERMOD dispersion model if actual monitored meteorological data acceptable to the SLO County APCD are available in a model-ready format. The use of screening models (e.g. SCREEN3) will not be appropriate for this project due to the number and location of DPM emission sources involved. Emissions estimates of criteria pollutants developed in Air Quality Subtask 1 above would be input to the dispersion model using appropriate model source representations. Maximum off-site modeled concentrations (including background concentrations if provided by the SLO County APCD) would be compared to appropriate California and federal ambient air quality standards.

Air Quality Subtask 3: Human Health Risk Assessment

Because there will be sensitive receptors (i.e. residences) within 1,000 feet of the Project, it is anticipated in accordance with the CEQA Air Quality Handbook that a human health risk assessment will be required for this Project. In addition, the need for this assessment was noted in the August 3, 2010 project comment letter from the SLO County APCD. The primary focus of this risk assessment will be cancer risk due to DPM emissions during operations.

DPM emissions will be modeled using either the U.S. EPA ISCST3 dispersion model with screening meteorological data or the U.S. EPA AERMOD dispersion model if actual monitored meteorological data acceptable to the SLO County APCD are available in a model-ready format. The use of screening models (e.g. SCREEN3) will not be appropriate for this project due to the number and location of DPM emission sources involved. Lifetime excess cancer risk will be estimated at locations with occupational worker or residential receptors using methods recommended by the California Office of Environmental Health Hazard Assessment (Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, October 2003).

Air Quality Subtask 4: Propose Mitigation Measures

Based on the results of Air Quality Subtasks 1 through 3 above, appropriate mitigation measures to reduce air quality impacts to the extent possible, and to less than significant levels where possible, will be developed. The air pollutant emission reductions anticipated as a result of recommended mitigation measures will be determined and incorporated in the final assessments conducted for Air Quality Subtasks 1 through 3.

In addition, it is within this task that the project will be reviewed for consistency with the SLO County APCD Clean Air Plan.

Air Quality Subtask 5: Assess Cumulative Impacts/ Greenhouse Gas Impacts

This assessment will include a qualitative discussion of the potential cumulative impacts of the project with other nearby projects (for criteria pollutants and TACs) and for greenhouse gases within the context of the requirements under AB32 and available CEQA guidance. Recently,

several California air quality districts have started providing quantitative CEQA review guidance for determining the potential significance of greenhouse gas emissions from proposed project. Unless the SLO County APCD or the County has developed specific quantitative methods for evaluating the potential significance of greenhouse gas emissions by the time this assessment is conducted, methodologies from other air quality districts may be used.

Air Quality Subtask 6: Prepare Technical Report Document

The results of the emissions inventory development, ambient air quality standard assessment (if required) and the human health risk assessment will be documented in a stand-alone technical report. This documentation will include data gathered as input to the process, as well as the calculated emission rates, dispersion model output, and risk assessment results.

The report will also include a discussion of potential impacts from Valley Fever and Naturally Occurring Asbestos to the extent that they are determined to be potential issues for the Project.

Air Quality Subtask 7: Review and Incorporate Air Quality/Greenhouse Gas Emissions to EIR Air Quality Section

Benchmark Resources will be responsible for oversight of the Golder Associates air quality analysis and will prepare the EIR Air Quality and Greenhouse Gas Emissions section of the EIR based on the final technical report prepared by Golder Associates.

Biological Resources

Data Gathering: The initial component of the Biological Resources evaluation data gathering phase will consist of peer review of the Applicant-submitted *Sensitive Species and Habitat Survey* (LFR 2009). In addition, data gathering will consist of review of CNDDDB and other state databases, previous EIRs or biological assessments, regional conservation plans, and other existing pertinent literature and studies. Field review will be conducted that will emphasize type and quality of vegetation communities and wetlands, and habitat suitability for and potential for occurrence of sensitive species.

Assumptions: Available data, including the LFR Sensitive Species and Habitat Survey, will be sufficient to determine baseline conditions for the EIR analysis. Electronically-mapped geographic information prepared by LFR (2009) and Project base maps, boundaries, and design will be available to Benchmark Resources in ArcGIS format. No additional field surveys (with the exception of ground truthing during peer review) will be required for the analysis.

Approach: Benchmark Resources will retain Berryman Ecological to conduct peer review of the Applicant-submitted Sensitive Species and Habitat Survey and to assist with the biological resources evaluation. Upon peer review verification of the adequacy of the LFR report (or completion of additional data collection if necessary due to deficiencies in the LFR report), Benchmark Resources will prepare biological resources setting section including a description and quantification of habitat types on site and sensitive plant and wildlife species known or potentially occurring on site and their likelihood of occurrence. We will also prepare site vegetation/habitat mapping and special-status species occurrence mapping for the EIR (based on GIS data from the LFR report, revised if necessary based on information from field review). We will determine and quantify impacts associated with habitat disturbance and will document impacts that may be associated with Project activities, including noise, vibration and lighting. The impact analysis will include a summary of impacts table displaying acreage of vegetation loss by type. We will identify mitigation when available to avoid or minimize significant or potentially significant impacts. Any geographic information prepared for the impact/mitigation section will be provided in appropriate format as a SHP file, with all appropriate metadata as specified in the RFP.

Cultural Resources

Data Gathering: The initial component of the Cultural Resources evaluation data gathering phase will consist of peer review of the Applicant-submitted *Archaeological Surface Survey* (Heritage Discoveries 2009). Benchmark Resources will retain AES to conduct the peer review.

Assumptions: Available data will be sufficient to document the existing cultural resources setting for the EIR. Supplemental surface or subsurface investigations will not be required. No known cultural resources, human graves, paleontological resources or Native American sacred sites are

present at the Project site. Consultation with Native American tribes will not be required or will be conducted by County staff who will provide any relevant findings and communication to Benchmark Resources for incorporation to the EIR, if necessary. There will be no federal involvement/approvals associated with the Project and NHPA compliance will not be required.

Approach: Benchmark Resources will retain AES to conduct peer review of the Applicant-submitted *Archaeological Surface Survey* and to assist with the cultural resources evaluation. Upon peer review verification of the adequacy of the *Archaeological Surface Survey* report (or completion of additional data collection if necessary due to deficiencies in the survey report), Benchmark Resources will prepare the cultural resources section of the EIR. No known cultural resources sites have been identified on the Project site. As such, our work plan anticipates that a summary of the cultural resources survey and findings will provide the appropriate setting discussion for the EIR. Although no known cultural resources sites have been identified on the Project site, we will prepare the Cultural Resources section of the EIR to discuss potential impacts associated with the potential for discovery of currently unknown cultural or paleontological resources and human remains during survey disturbance activities associated with the Project. We will identify recommended mitigation measures that will provide for the appropriate monitoring, work stoppages and treatment of any potentially significant cultural or paleontological resources during Project construction and operation.

Geology and Soils

Data Gathering: Data gathering will consist of a review of previous EIRs and other existing pertinent literature and studies. Golder Associates (Benchmark Resources' subconsultant regarding slope stability and geotechnical issues) will also conduct peer-reviews of the Applicant-submitted Engineering Geology Investigation (GeoSolutions 2009) and General Blasting Plan (Gasch & Associates 2009).

Assumptions: Sampling of geology or soils will not be required. Slope stability analysis and drilling logs/data will be available for review.

Approach: The mining and reclamation plan will be utilized to assess potential slope stability, blasting, or vibration hazards. Assessment and

mapping of the potential for upset conditions and contamination will be performed. Benchmark Resources will be responsible for the geology and soils baseline section (identifying the geology, soils, and humidity), and the impacts and mitigation section (including identification of potential hazards as a result of ground disturbance and/or upset conditions, surface drainage analysis, intelligent placement of stockpiles to minimize impacts and to protect water/biological resources, and utilization of soil erosion and topsoil reserves).

Hazards and Hazardous Materials

Data Gathering: Data gathering will consist of a one-day site reconnaissance to assess the site, and a thorough inventory of hazardous materials used in existing processing and equipment, storage tanks, and the transportation of hazardous materials.

Assumptions: The analysis will rely on the County's identified mitigation measures that will be incorporated into the Project. These will address hazardous impacts from mining and processing operations. Collection of site-specific soil or groundwater samples or analytical laboratory testing will not be required.

Approach: Information from hydrology assessments will be utilized in conjunction with storage/handling/disposal information to evaluate likelihood of project-related environmental impairment of soil, surface water, or groundwater. Storage, handling, and disposal methods will also be identified. The hazardous materials impacts/mitigation section will discuss hazardous materials/wastes as they apply to physical environmental impacts. Benchmark Resources will be responsible for the hazards and hazardous materials baseline section (including a summary table of information obtained, site map, and location of known hazardous materials), and the impacts and mitigation section (including a discussion of types of impacts and likelihood of occurrence, daily inspections for leakage, blasting analysis and mitigation, and best management practices). The Revised Initial Study (pages 18 and 19) notes that the following measures will be incorporated into the Project:

- To reduce impacts from spillage of petroleum products, the operators shall inspect roads, equipment and trucks daily for leakage and take immediate corrective action to eliminate any discovered leakage.
- A log of facility, equipment and road inspections shall be kept at the site office and shall be available for inspection by County staff.
- On-site servicing and fueling of vehicles shall be accomplished with the use of the following best management practices:
 - Servicing and fueling shall take place only in designated fueling areas outside of on-site drainages.
 - When fueling, tanks shall not be “topped off.”
 - A secondary containment, such as a drain pan or drain cloth, shall be used when fueling to catch spills or leaks.
 - Employees and subcontractors shall be trained in proper fueling, servicing, and clean-up procedures.
 - All fluid spills shall be reported immediately to the facility log.
 - Storage of hazardous materials shall be as far as practical from the on-site drainages.
 - A contingency plan for possible leaks and spills of hazardous materials shall be developed and implemented.

In addition, to reduce impacts related to proposed blasting, the Revised Initial Study (page 19) requires the Project to implement the recommendations of the blasting contractor; including but not limited to:

- Controlled blasting techniques;
- Blast site inspections;
- Employee safety meetings;
- Loading of explosives only under direction of a blaster-in-charge;
- Limiting blasting hours to between 7:00am and 6:00pm weekdays (no blasting after sunset);
- Established drilling operations;
- Post blast safety procedures;
- Pre-blast notification and survey;
- Preparation of a conceptual blasting plan;

- Blasting safety plan;
- Blast site security;
- Safety requirements for ignition systems;
- Safe blasting site preparation;
- Blast warning signs/signals; and
- Safe blasting procedures in accordance with regulatory agencies.

Land Use

Data Gathering: Data gathering for the land use analysis will include a detailed review of the County General Plan to identify goals and policies of potential applicability to the Project or Project site. We will review the County Land Use Ordinance and zoning and land use designation maps to determine applicable zoning restrictions and land use designations within the Project vicinity. Benchmark Resources staff will interview staff from the County Planning Department to identify specific land use and zoning issues deemed by staff to be relevant to the land use plan consistency analysis. If requested by staff and if available upon initiation of this task, we will also review a final or proposed final version of the County's Climate Action Plan for potentially applicable goals, objectives and policies.

Approach: The actual proposed intensity of development with development allowed will be assessed, as will the proposed use for consistency with policies of the County General Plan and Zoning Ordinance.

The project description/mapping will be utilized in conjunction with Land Use baseline inventory information to qualitatively assess whether the operation could impact other area operations or land owners.

Benchmark Resources will evaluate whether the Applicant's request for a County Land Use Ordinance modification to authorize an aggregate recycling facility without an existing waste disposal facility is compatible with the applicable County requirements specified at Section 22.30.020(D) of the San Luis Obispo County Code. While the Planning Commission or Board of Supervisors will make the ultimate findings regarding whether to grant the modification based on the above standards, the Land Use section of the EIR will provide the necessary analysis and information on

which the Commission or Board can base its decision. Further, as the County's consultant, Benchmark Resources will provide its recommendation regarding whether the standards have been met and can note in the EIR that the ultimate determination will be made by the County decision-makers when they consider approval of the Project.

Benchmark Resources will be responsible for the land use baseline section (including a discussion of designated area land uses, a summary of actual type and intensity of area development, and a map of land use designations in the site vicinity), and the impacts/mitigation section (including a discussion of development type, intensity, and consistency).

Noise

Data Gathering: Data gathering will consist of a review of previous EIRs and other pertinent literature and studies. Additionally, Benchmark Resources will retain Bollard Acoustical Consultants (BAC) to conduct peer review of the Applicant-submitted David Dubbink Associates (2010) to determine if the report adequately evaluates baseline conditions on Project impacts.

Assumptions: Access will be available to nearby sensitive receptors and noise sources. No nighttime operations are proposed.

Approach: Baseline inventory information and project description process information will be utilized in conjunction with professional judgment to qualitatively assess noise effects on receptors, and compliance with regulations will be assessed. Benchmark Resources will also ensure that the peer-review described above evaluates the Blasting Plan's compliance with applicable local, state, and federal requirements. The Project will be analyzed to ensure that applicable requirements are achieved through Project revisions or compliance with mitigation measures. Benchmark Resources will be responsible for the noise baseline section (including a summary of existing conditions and ambient noise levels on-site), and the impacts and mitigation section (including compliance status information).

Energy Conservation

Data Gathering: Data regarding Project energy consumption and any proposed energy efficiency elements of the Project will be developed as a component reviewing the Project application and preparing the Project description.

Assumptions: Energy efficiency evaluation will be limited to documentation of fuel use and energy requirements of the Project.

Approach: Benchmark Resources will conduct the evaluation of fuel use and energy use. We will review compare of the Project's estimated energy consumption to the ability of the energy provider to deliver that power. We will also document any Applicant-proposed energy efficiency measures, We will also identify and discussion methods, if any, for reducing and minimizing fuel use and other energy consumption which could be included in the Project to reduce energy consumption and promote energy conservation to the extent feasible. Energy conservation measures that may be appropriate for consideration include energy efficient buildings, trip reduction measures, measures to encourage alternative modes of transportation, measures to minimize vehicle and equipment idling, and recycling opportunities. We will also provide a discussion of applicable energy conservation regulations, including those contained in UBC Title 21 and County General Plan policies.

Recreation

Data Gathering: Data gathering will consist of a review of County trails maps, and coordination with the County Parks Department.

Assumptions: Maps and data will be readily available. The County Parks Department will be available to provide input regarding the Salinas River Trail.

Approach: Benchmark Resources will evaluate the Project's potential effect on the Salinas River Trail alignment. The analysis will evaluate potential effects on the development and use of this segment of the Salinas River Trail in relationship to the Project's footprint and lifespan and anticipated development, use and access of the Project area segment of the Salinas River Trial.

Transportation/Circulation

Data Gathering: Benchmark Resources will retain Hatch Mott MacDonald (HMM) to peer-review the Applicant-submitted Traffic Impact Study (TPG Consulting 2009) and Sight Distance Evaluation (TPG Consulting 2009).

Assumptions: The TPG sight-distance analysis is adequate for use in the updated traffic study. This work plan assumes that HMM will be provided with various electronic files from the Applicant's traffic consultant, including level of service calculation files. (If these files are not provided, HMM will require additional budget to recreate files in order to be incorporated into the revised analysis.) Any necessary additional traffic volumes will be readily available in the event that additional study intersection or roadway segments are added to the scope. (If such data is not available, HMM will require addition budget to collect this data).

Approach: Benchmark Resources will retain HMM to prepare an updated/revised Traffic Impacts Study for the Project which will provide the information necessary for the Transportation and Circulation section of the EIR. The following subtasks will be performed for this effort.

Traffic Subtask 1: Initial Peer Review

A peer review will be prepared of the 2009 traffic impact analysis for the project and all relevant supplementary letter reports. This review will focus on level of service calculation methodologies and assumptions. However, all elements of the study will be reviewed including:

1. Study scope;
2. Existing traffic volume data;
3. Trip generation, distribution and assignment assumptions;
4. Level of service calculation methodologies and assumptions;
5. Potential impacts to railroad crossings, particularly the one located near the intersection of Estrada Avenue and El Camino Real;
6. Existing, Project and Cumulative impacts; and
7. Recommended mitigation measures.

HMM will prepare a peer review memorandum summarizing all of the comments and issues identified through the peer review. This memorandum will be reviewed by Benchmark Resources and provided to the County. The memorandum will include recommendations regarding the need for revised or additional traffic analysis necessary to support the EIR.

Traffic Subtask 2: Peer Review Conference Call

Benchmark Resources and HMM staff will participate in a conference call with the County (and Applicant at the County's discretion) to discuss the peer review memorandum and recommendations. The purpose of this conference call will be to discuss issues raised in the memorandum, answer questions, clarify points and identify which aspects of the traffic study and supplemental letters, if any, would need to be revised prior to completion of the Draft EIR.

Traffic Subtask 3: Revisions to Traffic Report

Based on decisions made in Subtask 2, above, HMM will make the necessary revisions to the Applicant's traffic report. These revisions are anticipated to include analysis revisions, text edits, and exhibit revisions, amongst other items. Analysis of additional study intersections or roadway segments may also be incorporated into the revised report.

Traffic Subtask 4: Rail Crossing Analysis

We are aware that the California Public Utilities Commission (PUC) has submitted a letter to the County regarding the railroad crossing near the Estrada Avenue/El Camino Real intersection. This letter asks for a review of Project impacts to the crossing. The current traffic report does not address this issue. HMM will perform an evaluation of the new railroad crossing signal warrant contained within the new 2009 Manual on Uniform Traffic Control Devices, in order to determine if the project would trigger signalization of this intersection. Interactions between vehicle queues at the Estrada/El Camino Real intersection and the adjacent railroad crossing will be discussed. We will also evaluate the physical condition of the crossing, including the pavement condition and presence of standard crossing gates and advanced signing and pavement striping.

Traffic Subtask 5: Documentation

HMM will update the applicant's traffic report text, exhibits, and appendix to reflect the revised analysis, including appropriate graphics. The revised traffic report will initially be prepared as an administrative draft report for review by Benchmark Resources and San Luis Obispo County staff. The County's comments will be incorporated into a final report for incorporation into the environmental impact report for the project.

Traffic Subtask 6: Assistance with Environmental Report

HMM staff will be available to assist Benchmark Resources with the incorporation of the traffic study and supplemental letters into the Draft Environmental Impact Report for the project. This will include both 1) interpretations of the report contents; and 2) review and feedback regarding the draft circulation section of the traffic report, including mitigation descriptions.

Benchmark Resources will utilize the information contained in the final Traffic Impact Study to prepare the Administrative Draft EIR Transportation and Circulation section. Additional information and analysis that may be required for that section, including evaluation of potential effects on bicycle and pedestrian circulation (e.g., Salinas River Trail impacts) and the Project's consistency with applicable transportation-related policies of the County General Plan Circulation and other elements will also be evaluated by Benchmark Resources with input as needed from HMM.

Water

Data Gathering and Peer Review: Data gathering will consist of a review of additional available State, local agency and Applicant data; acquisition and review of logs and completion reports for on-site wells; identification of wells within a 1-mile radius; measurement of water levels in on-site wells; the collection of water quality samples from two on-site wells, springs/ponds, and rivers for analysis of metals and general minerals; and contact with local area knowledge base (RWQCB hydrologists). A peer-review of the Applicant-submitted Drainage Calculations (Tartaglia

Engineering 2009) will be completed by EMKO Environmental, Benchmark Resources' hydrology subconsultant.

Assumptions: The County will assist in obtaining DWR well log reports for wells within 1 mile of the site. Collection of surface water and groundwater samples and analytical laboratory testing are required to define baseline conditions and the Applicant will provide data on well construction (including well logs), pumping rates, and current usage. The Applicant will provide documentation of estimated project water demand. The Applicant stormwater and drainage studies are consistent with standards of practice and provide results consistent with regulatory guidance (e.g. 25-yr and 100-yr storm events).

Approach: With input from EMKO Environmental, Benchmark Resources will prepare the hydrology/groundwater quality setting section (including existing meteorological conditions, surface water occurrence and water quality, groundwater occurrence and water quality, available water supply and project water demand, groundwater potentiometric map (if applicable), surface water drainage map, well and spring map, and hydrogeologic cross-sections. The identification of data gaps (including water quality/quantity issues not discussed and/or considered significant by existing studies) will also be performed.

The evaluation of Hydrology and Water Quality will be based on a combination of the criteria presented in the County's Initial Study Checklist. Definition of baseline conditions will be accomplished using information contained in studies submitted by the Applicant (after conducting peer review and deemed adequate for use), summarizing data presented in other relevant documents (e.g. other EIRs, monitoring reports for nearby mining operations, County Public Works and State Department of Water Resources documents) and collection of site-specific data. The drainage study submitted by the applicant will be reviewed and the results compared with local meteorological data and the peak flow and volumes numbers produced from standard rainfall-runoff methodologies (e.g. NRCS TR-55). A site reconnaissance visit will be conducted and measurements will be made of groundwater elevations in available wells. Groundwater and surface-water samples will be collected and analyzed for general minerals and related parameters to establish baseline water quality.

A partial listing of the data and information necessary for the CEQA analysis of Hydrology and Water Quality include:

- Baseline meteorological information on rainfall and evaporation, available from public sources;
- Identification of the location and completion details for groundwater wells within 1 mile of the project, available from the California Department of Water Resources;
- Surface-water runoff characteristics of the site under baseline and proposed project conditions, including flow volumes and rates for key storm events (e.g. 25-yr 24-hr storm; 100-yr 24-hr storm), determined using standard rainfall-runoff methodologies;
- Surface-water quality, including parameters identified in the Water Quality Control Plan (Basin Plan) for the California Regional Water Quality Control Board Central Coast Region, to be analyzed in samples collected during the site reconnaissance;
- Groundwater conditions, including seasonal changes in water levels, mapping of the hydraulic gradient, identification of flow conditions, testing to identify the transmissivity of the water-bearing units, and identification of recharge areas, available from site-specific data and information from adjacent facilities; and
- Groundwater quality, including parameters identified in the Basin Plan, plus parameters of potential concern in the region, including iron, and manganese.

Water Use and Supply

An independent assessment the project water demand will be made based on data and information available from similar mining projects and information provided by the applicant. The availability of water to meet this demand will be evaluated based on the baseline water use at the project site and the measurements made at the site as part of the site reconnaissance. This evaluation will identify the potential for impacts to occur related to the quantity and availability of groundwater and, partly, to groundwater quality.

Discharges to Surface Water and Groundwater

The Project will include the discharge of process water and waste fines to settling ponds. The potential for this water to enter surface-water courses or to percolate to groundwater will be assessed, along with the effect on water quality. The potential regulatory requirements related to such discharges (e.g. federal Clean Water Act, state Non-Degradation Policy and Waste Discharge Requirements, County policies and ordinances) will also be evaluated and used to define compliance and potential mitigation requirements. The use of petroleum products, chemicals for vehicle repair and maintenance, and potential blasting agents may degrade water quality if not managed appropriately. Evaluation of the use of such substances will be coordinated with the Hazards and Hazardous Materials section of the EIR to be sure that the potential impacts to surface water and groundwater are appropriately evaluated and identified.

Stormwater Runoff

The Project will result in major changes to the ground surface and topography. The resulting changes to stormwater runoff, in terms of both peak flow rates and volumes, will be assessed and compared with the proposed stormwater control systems. The ability of the proposed systems to retain appropriate storm flows, depending on the regulatory requirements of SMARA, the Regional Water Quality Control Board, or the County (e.g. 20-yr storm, 25-yr storm, 100-yr storm), will also be evaluated. The potential to use the stormwater system as part of the project water supply, to recharge groundwater, and/or to maintain surface flows in critical areas, will also be considered to offset potential impacts. In addition, the ability of the proposed control systems to meet stormwater quality requirements (e.g. SWPPP, general construction or industrial NPDES permits) and the potential to violate any water quality standards will be addressed as part of the analysis in the EIR.

Reclamation

The proposed conditions after mining is completed, 30 or more years in the future, will be different than both current conditions and the conditions that are present during the active mining phase of the proposed project. Potential water demand for dust control or maintenance of vegetation, discharge of water from or to the site, and

stormwater runoff rates and volumes will be compared to baseline conditions to evaluate whether the proposed reclamation plan is sustainable or creates any potential impacts related to the criteria listed above.

Impacts and Mitigation Measures

Appropriate mitigation measures will be developed for any potentially significant impacts identified in the Hydrology and Water Quality section of the EIR. Mitigation monitoring programs, reporting requirements, and compliance schedules will also be prepared, as appropriate, to ensure that the mitigation measures are enforceable and that County staff can effectively evaluate compliance. The impacts/ mitigation section will include a discussion of surface and groundwater monitoring requirements, and mitigation will be focused on Project design and process technologies.

Thresholds of Significance, Impacts, and Mitigation Measures

Benchmark Resources will work with San Luis Obispo County regarding appropriate evaluation criteria and thresholds of significance. Typical sources for criteria include:

- Appendix G of the CEQA Guidelines;
- San Luis Obispo County General Plan and County Ordinances;
- Previously prepared EIRs, particularly recent EIRs and mining-related EIRs (e.g., the Pankey Sand and Gravel Project); and
- Thresholds established by Responsible and Trustee Agencies.

All impacts and mitigation measures will be clearly identified, and address all applicable environmental issues and thresholds of significance. All proposed mitigation measures will be drafted in the form of permit conditions that can be inserted into the County's standard Conditions of Approval. Additionally, a Summary of Impacts and Mitigation Measures will be prepared and included as part of the Administrative Draft EIR.

Cumulative Impacts, Mandatory Findings, and Project Alternatives

Benchmark Resources will prepare sections on cumulative impacts, mandatory findings of significance, and assess Project alternatives. Benchmark Resources prefers to evaluate at least four alternatives, as we believe that four alternatives present a reasonable range of alternatives for a mining project. While the specific alternatives will depend on the results of significant impacts that are identified in the resource evaluations, the alternatives may include:

- The No Project Alternative (mandated by CEQA);
- The Alternative Site Location(s)(reduces site-specific impacts on a range of issues and may include alternative alluvial site and alternative hard rock alternative);
- The Reduced Production Alternative (reduces traffic, air quality and noise impacts); or
- The Reduced Footprint Alternative (reduces the length of time of the Project and may avoid certain resource identified in the resource evaluations).

Actual alternatives evaluated will be developed based on the significant environmental impacts identified and alternatives that would reduce or avoid those impacts.

Complete and Submit Administrative Draft EIR

The purpose of this task is to assemble the information developed during baseline inventories and impact analyses/mitigation described above into an Administrative Draft for review by County staff. Benchmark Resources will submit 10 copies of the Administrative Draft EIR to County staff for review.

Deliverables

Benchmark Resources will provide the County with:

- Administrative Draft EIR:
 - Four (4) hardcopies in three-ring binders; and
 - One (1) CD-ROM copy in original format.

LAS PILITAS QUARRY PROJECT
COST ESTIMATE

COST CATEGORY TASK AND SUBTASK	LABOR					LABOR SUBTOTAL		EXPENSES		TOTAL ESTIMATED COSTS (\$)
	Principal \$200/hr (hrs)	Project Director \$195/hr (hrs)	Project Manager/ Sr. Planner \$175/hr (hrs)	Technical Staff \$95/hr (hrs)	Support Staff \$85/hr (hrs)	Hours	Costs	Direct Expenses ⁽³⁾ (\$)	Subcontractors (\$)	
	TASK 1: PROJECT DESCRIPTION AND EIR OUTLINE									
1.1 Prepare Draft Project Description		24	12	12	16	64	\$9,280	\$930		\$10,210
1.2 Prepare EIR Outline and Style Guide		4	4		8	16	\$2,160	\$220		\$2,380
TASK 1 SUBTOTAL	0	28	16	12	24	80	\$11,440	\$1,150	\$0	\$12,590
TASK 2: PREPARE ADMINISTRATIVE DRAFT EIR⁽¹⁾										
2.1 Introduction and Summary		2	4	2	8	16	\$1,960	\$200		\$2,160
2.2 Finalize Project Description	4	8	8	10	6	36	\$5,220	\$520		\$5,740
2.3 Aesthetics		8	16	32	8	64	\$8,080	\$810		\$8,890
2.4 Agricultural Resources		2	4	2	4	12	\$1,620	\$160		\$1,780
2.5 Air Quality		6	4	4	4	18	\$2,590	\$260	\$28,000	\$30,850
2.6 Biological Resources		8	16	8	8	40	\$5,800	\$580	\$10,475	\$16,855
2.7 Cultural Resources		4	4	2	8	18	\$2,350	\$240	\$1,758	\$4,348
2.8 Geology and Soils		4	8	4	4	20	\$2,900	\$290	\$20,000	\$23,190
2.9 Hazards and Hazardous Materials		4	8	2	4	18	\$2,710	\$270		\$2,980
2.10 Land Use		18	12	4	4	38	\$6,330	\$630		\$6,960
2.11 Noise		12	8	4	4	28	\$4,460	\$450	\$3,000	\$7,910
2.12 Traffic and Circulation ⁽²⁾		16	18	16	16	66	\$9,150	\$920	\$15,145	\$25,215
2.13 Water		6	6	6	6	24	\$3,300	\$330	\$15,000	\$18,630
2.14 Alternatives		16	8	4	8	36	\$5,580	\$560		\$6,140
2.15 Other CEQA Sections		8	16	8	8	40	\$5,800	\$580		\$6,380
2.16 Print and Assemble Administrative Draft EIR (5 copies)		0	4	4	16	24	\$2,440	\$1,100		\$3,540
TASK 3 SUBTOTAL	4	122	144	112	116	498	\$70,290	\$7,900	\$93,378	\$171,568
TASK 3: PREPARE DRAFT EIR										
3.1 Modify Based on Applicant and County Comments		24	36	4	16	80	\$12,720	\$1,270		\$13,990
3.2 Print and Assemble Document (45 copies)		4	8	8	32	52	\$5,660	\$5,100		\$10,760
TASK 3 SUBTOTAL	0	28	44	12	48	132	\$18,380	\$6,370	\$0	\$24,750
DRAFT EIR SUBTOTAL										\$208,908
TASK 4: PREPARE ADMINISTRATIVE FINAL EIR										
4.1 Review/Prepare Responses to DEIR Comments		40	40	16	40	136	\$19,720	\$1,970		\$21,690
4.2 Print and Assemble Administrative Final EIR (5 copies)			4	4	16	24	\$2,440	\$1,100		\$3,540
TASK 4 SUBTOTAL	0	40	44	20	56	160	\$22,160	\$3,070	\$0	\$25,230
TASK 5: PREPARE FINAL EIR										
5.1 Review Comments and Incorporate Changes		16	24	8	32	80	\$10,800	\$1,080		\$11,880
5.2 Print and Assemble Document (55 copies)			8	8	32	48	\$4,880	\$5,100		\$9,980
TASK 5 SUBTOTAL	0	16	32	16	64	128	\$15,680	\$6,180	\$0	\$21,860
TASK 6: MEETING ATTENDANCE, MANAGEMENT, AND COORDINATION⁽⁴⁾										
6.1 Kick-Off Meeting		15	15	4	16	50	\$7,290	\$730		\$8,020
6.2 Staff Meetings (5 meetings)		75	30	4	24	133	\$22,300	\$2,230		\$24,530
6.3 Management and Coordination		40	40		24	104	\$16,840	\$1,680		\$18,520
6.4 Public Hearings (Planning Commission/Board of Supervisors) (4 meetings)		60	30	8	32	130	\$20,430	\$2,040		\$22,470
TASK 6 SUBTOTAL	0	190	115	16	96	417	\$66,860	\$6,680	\$0	\$73,540
FINAL EIR SUBTOTAL										\$120,630
TASK 7: MITIGATION, MONITORING, AND REPORTING PROGRAM										
7.1 Prepare Administrative Draft MMRP		4	8		16	28	\$3,540	\$350		\$3,890
7.2 Prepare MMRP		4	4		4	12	\$1,820	\$180		\$2,000
TASK 7 SUBTOTAL	0	8	12	0	20	40	\$5,360	\$530	\$0	\$5,890
TASK 8: PREPARE FINDINGS⁽⁴⁾										
8.1 Prepare Findings of Fact		16	16		18	50	\$7,450	\$750		\$8,200
TASK 8 SUBTOTAL	0	16	16	0	18	50	\$7,450	\$750	\$0	\$8,200
FINDINGS AND HEARINGS SUBTOTAL										\$8,200
SUBTOTALS							\$217,620	\$32,630	\$93,378	\$343,628
GRAND TOTAL										\$343,628

⁽¹⁾ See Table 2 of the Proposal, submitted under separate cover, for specific approach and assumptions related to environmental resource evaluations.
⁽²⁾ Actual traffic costs dependent on number of intersections and road segments required by County.
⁽³⁾ Based on 10% of labor costs, rounded to the nearest \$10. EIR reproduction costs are estimated based on number of copies. Assumption: 1 volume for Draft EIR and Final EIR (Volume 2 on disks).
⁽⁴⁾ This Cost Estimate provides an estimate as required by Section 3.4 of the Request for Proposal. Benchmark Resources understands, however, that staff meetings, public hearings, and preparation of findings shall be invoiced on a time and materials basis.