



San Luis Obispo County

Department of Planning and Building Environmental Division

TO: Bruce Steubing, Principal and Project Manager, Benchmark Resources

FROM: Jeff Oliveira, Environmental Resource Specialist

DATE: October 15, 2010

SUBJECT: Oster/Las Pilitas Quarry EIR Proposal

The purpose of this memo is to provide comments on the proposal submitted by Benchmark Resources for the Oster/Las Pilitas EIR (August 2010) in response to the Request for Proposal sent by the County of San Luis Obispo. In particular, I'd like to thank you for the proposal that you submitted and to provide comments and questions to be addressed in a revised or supplemental proposal. The following comments and questions should be addressed by Benchmark Resources within one week to facilitate final proposal reviews and to schedule interviews.

- **General Comments:** Please provide greater detail on the scope proposed for each area of analysis and for each subcontractor. It should be clear as to exactly what is being proposed. Although the proposal used a spreadsheet/matrix approach to showing the impact analysis approach, the County requires greater detail on exactly what is being proposed. Each impact area proposed for analysis should clearly state what the consultant is proposing to do, how the applicant's studies will be scrutinized, how the analysis will be approached, who will be working on it and what exactly subcontractors are proposing. Also, please include peer reviews of all of the applicant-prepared studies. This is a critical step in an independent EIR analysis. Many assumptions made on the adequacy of the applicant's studies need to be revisited.
- **Aesthetics:** Visual impacts will be a key issue, along with other land use compatibility issues. The public is very concerned about how the site will look during operations, especially the more visible upper elevations. The proposal seems to leave out the need for accurate visual simulations for use in the viewshed analysis. The proposal did include "annotated photographs", are these synonymous with photo simulations? Photo simulations will be critical to accurately characterize how the landscape will look from public vantage points. Please revise the aesthetic scope to include a more detailed set of photo simulations, including simulations from key vantage points.
- **Air Quality:** This section is a good example of the need for more detail. This is an important issue from a neighborhood compatibility/agricultural/APCD standpoint. The proposal includes a cost of \$30,850 for this section but we don't have any detail on what this price will get us in the way of analysis and subcontractor work. We need to be able to break down exactly what each impact area is proposing in greater detail.
- **Agricultural Resources:** In retrospect, the subject site does not support grazing operations. The site is incredibly folded with little to no flat areas and does not support agricultural soils or uses. Impacts from conversion of grazing land will not likely be a

concern. Please revise the proposal and scope (and cost) to reflect this. The primary concerns for agricultural resources are impacts related to dust generation and water use.

- **Cultural Resources:** This section and corresponding cost don't seem to match the level of effort required. Although this site is located near the Salinas River, the area of site disturbance is very steep and not conducive to Native American use. Peer review of the applicant's archaeological report is needed, but it seems unlikely that new surveys will be needed outside of a possible ground truthing. Please describe why the proposal includes an analysis of federal (NHPA) issues.
- **Hydrology, Water Quality and Water Supply:** Please provide more detail on exactly what the subcontractor is proposing for this section. Although the proposal includes an analysis of potential changes in the quantity of groundwater, the proposal should focus more on this issue, with increased detail, based on the high level of public concern with this issue. The EIR will need to accurately depict impacts to water availability and neighboring water uses.
- **Noise:** Please include, specifically, the peer review of the applicant's Blasting Plan, including a review of applicable local/state/federal regulations and oversight (County Sheriff?). The EIR will really need to be clear on exactly what the public can expect from the proposed blasting and the applicant's plans need to be scrutinized.
- **Traffic:** After review of the proposed traffic analysis by our Public Works Department, we would like to ask for a revision in the traffic subcontractor choice. Specifically, Public Works recommended using the firm of Hatch Mott MacDonald as the traffic subcontractor. They were included in a different proposal and their approach and history on County projects works best. Please contact them for inclusion in your proposal. In addition, it will be critical to make sure that traffic analysis includes traffic generation from the recycling component of this project (in addition to the mining operation) and to be sure that traffic impacts related to the railroad crossing are analyzed (the applicant's studies did not address these issues). This is another section that has a high price tag but little detail on exactly what the methodology will be for the analysis.
- **Land Use:** The proposed project includes a concrete/asphalt recycling component. The County Land Use Ordinance identifies the Recycling and Scrap land use in the Rural Land zone as permitted only in association with an existing waste disposal facility (i.e., land fill). The applicant is requesting a County Land Use Ordinance modification, as stipulated in Section 22.30.020(D) to allow recycling in Rural Lands without the association with an existing waste disposal facility. Please include a detailed discussion of Land Use compatibility with respect to this modification request for inclusion in the EIR.

Please feel free to contact me (805-781-4167, joliveira@co.slo.ca.us) if you have any questions on our comments above. We are requesting that you provide the Revised Proposal by next Friday, October 22, at the latest. Thank you again for your proposal and I look forward to reviewing your responses.