



To: Marti Fisher/Planning/COSLO@Wings,
Cc:
Bcc:
Subject: Fw: Oster Quarry Scoping Comments-July 17, 2010
From: Jeffrey Oliveira/Planning/COSLO - Thursday 07/29/2010 04:36 PM

July 17, 2010

Dear Mr. Oliveira and County Staff,

The following comments are being submitted by SMART with regards to the Oster Quarry project after reading the Scoping Document, reviewing some of the applicants initial studies, and attending the community meeting on July 8, 2010. Please let us know that you have received these. Thank you.

Page 1 -- Environmental Factors Potentially Affected: Cultural Resources are an environmental factor that will potentially be affected, and that box needs to be checked. Without input from the Chumash and Salinan tribes it is inaccurate to suggest there will be no impacts. These experts on Native American history in the area must be contacted, and their expertise incorporated, for any impact analysis to be complete and accurate. According to this NOP, they have not yet been notified.

Page 3 -- Fuel Storage: No on-site fuel storage means more fuel truck trips on a narrow, substandard, dangerous road. Quarry equipment needs fuel. It appears the removal of on-site fuel storage makes the project more dangerous, not less. The impacts from added fuel-truck trips must be included in the analysis.

Page 4 & 5 -- Aesthetics: This project site is visible from Hwy 101. There is no mention of the view from the 101 corridor in the scoping.

Pages 7-10 -- Air Quality: Cumulative impacts must be assessed taking into account the SMR Phase 1 project (that project has been approved, and the EIR from that project identified this as a Class 1 Impact). The NOP states the project will have insignificant impacts regarding Greenhouse Gas Emissions. This unsubstantiated claim is just that: unsubstantiated. There is no evidence to support the contention that 200-plus additional truck trips, plus emissions from operational equipment, will have no impact on Greenhouse Gas Emissions. The opposite is true, and the EIR must address that possibility.

Pages 11-13 -- Biological Resources: Cumulative impacts must be assessed with SMR Phase 1 project (the EIR from that project identified this as a Class 1 Impact).

Page 13 & 14 -- Cultural: There is a contradiction in saying that the potential for

Native American activity is great because of the proximity to Salinas River, and then concluding that there will be little impact. Again, the Chumash and Salinan representatives must be consulted.

Pages 14-17 -- Geological: Proximity to the Salinas River may make erosion and sedimentation a significant issue. This must be addressed in the EIR.

Pages 17-19 -- Hazards & Hazardous Materials: The NOP states this project will have insignificant impacts regarding emergency response and evacuation. The increased truck traffic alone increases the potential for interference with both emergency response and evacuation. This project is Potentially Significant in this regard, and must be analyzed as such.

Pages 19 -- Noise: Again, cumulative impacts must be assessed with SMR EIR being considered (the EIR from that project identified this as a Class 1 Impact).

Page 24 -- Public Service/ Utilities: Yet again, cumulative impacts must be assessed with SMR Phase 1 project especially with regard to fire protection, road use and maintenance, and school safety.

Pages 28-30 -- Transportation/ Circulation: This scoping document significantly downplays the amount of impacts. With 208 additional trips possible, and the quarry operating 11 hours a day, it would mean 19 truck trips on Hwy 58 every hour, which comes out to one trip every three minutes. This is a significant increase in traffic and needs to be addressed as a cumulative impact along with the SMR Phase 1 project impacts (the EIR from that project identified this as a Class 1 Impact). Additionally, there is no mention of a staging area for trucks waiting to access the project site. A staging area will be necessary, and whatever plan is adopted must be included in the analysis. It has been noted that tractor/trailer rigs cannot avoid crossing the centerline on many curves on Hwy 58, yet no mention of this is included in the scoping documents. It is a serious factor in the traffic impacts associated with this project.

The future improvements needed at Estrada and H Street, and at Estrada and El Camino are suggested (these include signalization and a left turn lane at El Camino, and increasing of crossing guard hours at H street. We also suggest a crosswalk with flashing lights and a manually-operated signal light at Estrada and H street for school safety during peak use hours). Yet the conclusion of this report is that these improvements are not included in the mitigation since funding is not guaranteed at this time.

This then becomes a defacto Class 1 impact and must be included in the EIR.

Pages 30-31 -- Water: Again, cumulative impacts must be assessed with SMR

EIR being considered (the EIR from that project identified this as a Class 1 Impact). The original proposal stated daily water use at 20,000 gallons per day. Washing aggregate has been removed at the request of the applicant. The EIR must address possible monitoring measures to assure compliance. The revised project does not include a new proposed water use figure. That number is essential to the EIR and must be included. The proposed well for this project needs further identification, as the type of well (surface water vs. sub-surface water) will have differing impacts on the environment.

Page 32 -- Mandatory Findings of Significance: Cumulatively considered impacts must be marked as significant. In light of the approved SMR project, all overlapping impacts must take into account the projected impacts from that project.

Page 33 -- Exhibit A: There is no reference to contacting the Chumash or Salinan councils for input to the Cultural section. Given the potential for native peoples to congregate in this area, this needs to be done before scoping can be complete.

Page 34: We request that the Santa Margarita Ranch EIR be included as a reference so that cumulative impacts will be assessed accordingly.

General comments:

- 1) All overlapping impacts need to be studied as cumulative in conjunction with the multiple Class 1 impacts cited in the Santa Margarita Ranch EIR.
- 2) Since owner of the property and the operators of the quarry stand to reap financial rewards if this project is approved, any impacts that degrade the quality of life or loss of property value for the neighbors of this property need to be mitigated thru financial compensation.
- 3) Any mitigation(s) must be funded and guaranteed before the project is allowed to go forward.
- 4) Any mitigation(s) based on recommendations for operation must include means for enforcement of those recommendations.
- 5) The on-site refueling plan and no aggregate washing need to be made formal conditions of approval so this cannot be changed in the future after the project goes forward.
- 6) In fairness to both the public and the applicant, the county should make an official decision about whether the asphalt and concrete recycling is or is not allowed under the present land use zoning.

Thank you, John Beccia
SMART
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