

To: County of San Luis Obispo, Planning and Building Department
Jeff Oliveira, jliveira@co.slo.ca.us

Subject: Oster (Las Pilitas Quarry) CUP / Reclamation Plan (DRC2009-00025)

Date: 26-Jul-2010

From: Mark S. Edwards, Ph.D.
6450 Parkhill Road
Santa Margarita, CA 93453-8625
805-748-3300

cc: Ellen Carroll, elcarroll@co.slo.ca.us
John Nall, jnall@co.slo.ca.us
James Patterson, jpatterson@co.slo.ca.us
Holly Phipps, hhipps@co.slo.ca.us

Please include the following scoping comments in response to Project DRC2009-00025 (ED09-258), Oster Living Trust (Las Pilitas Quarry) Condition Use Permit and Reclamation Plan.

Aesthetics

The proposed project will:

1. Create an aesthetically incompatible site open to public view
 - a. The proposed project site is immediately adjacent to, **will be visible from and have substantial adverse effect on the scenic vista of the Salinas River view corridor.**
 - b. The Salinas River creates a natural gateway welcoming tourists into Calf Canyon and areas further east, including the Carrizo Plain National Monument, in San Luis Obispo County. On a daily basis, these natural, rural areas are heavily used by cyclists, and for motorcycle touring. Additionally, during spring months, large groups of tourists from around the world seeking the natural beauty of our county visit this site, and areas to the east, to witness the spring wildflower event (McLeod, 2004).
 - c. The proposed industrial elements of the project, heavy equipment, excavated slopes absent of native vegetation, dust clouds, a significant increase in heavy vehicle road traffic and other aspects of the operation **will result in a significant change to the visual character of the rural area.**
 - d. The proposed site would be in full view by persons utilizing the Salinas River natural and historic site; contrary to the 'momentary' view described in the Revised Initial Study (01-Jul-2010).
2. Introduce a use within a scenic view open to public view

- a. **The proposed project will substantially damage scenic resources, including but not limited to: trees, rock outcroppings within a state scenic highway.**
 - i. The proposed project site is immediately adjacent to, will be visible from and will impact significant portions of, Blue Star Memorial Highway (CA-58). The site is within 5 miles of the San Luis Obispo County origin of this named roadway, which is sponsored by the National Council of State Garden Clubs, Inc. California Highway 58 was designated by the California Legislature to pay tribute to all who have served, those who are presently serving, and those who will serve in the nation's armed forces (Caltrans, 2009).
3. Change the visual character of an area
 - a. Due to the nature of the proposed project, the existing topography will never be reclaimed. Reclaimed slopes will appear, at best, artificial, in contrast to the topography immediately surrounding the site.
 - b. The native chaparral and oak woodland vegetation currently occupying the site is inconsistent with grazing demands of domestic livestock; therefore, the proposed revegetation plan to support "future use as ranching and grazing land" would result in a plant palate significantly different from the current species diversity.
 - c. **The proposed project will substantially degrade the existing visual character or quality of the site and its surroundings.**
 4. Create glare or night lighting, which may affect surrounding areas
 - a. The proposed project activity, including clearing of native vegetation and topsoil creating bare soil conditions, **would significantly increase green, red and near-infrared light reflectance (i.e., glare)** when compared to the existing reflectance values (Everitt et al, 2001). This significant change in light reflectance would not only impact areas adjacent to CA-58, but from other viewpoints within the surrounding Salinas River view corridor.
 - b. The proposed project maintains the option for the use of nighttime lighting, **which would create a new source of substantial light adversely effecting nighttime views in the area.**
 - i. Although the 01-Jul-2010 revised initial study indicates there are no provisions for nighttime activities or associated nighttime lighting "at this time", clearly stationary and mobile sources of nighttime light will be present, which is greater than the current level (near absence) of nighttime light. This lighting, and associated sky glow will be exacerbated during periods of low clouds or fog. The additional sources of stationary and/or mobile lighting associated with this proposed project will impact the darker night sky of the surrounding rural and natural areas. The negative impacts of light pollution are not only associated with the highly desired darker night sky aesthetic, but also influences on both vertebrate and invertebrate wildlife.

5. Impact unique geological or physical features
 - a. The proposed project site is within a unique transition area between grasslands to the west, the riparian habitat of the Salinas River immediately to the west and the chaparral and oak woodland plant communities (Ritter, 2006).
 - b. **The very nature of the proposed project, removal of native vegetation and extraction of underlying substrates will irrevocably change and have potentially significant impacts on the physical features of this location.**

Agricultural Resources

The proposed project will

1. **Potentially significantly impair agricultural use of other property or result in conversion to other uses.**
 - a. The proposed project clearly states that mining operations have the potential to spread weeds through the off-site transport of seed resulting in adverse impacts to agriculture, increased wildfire threats and increased erosion and/or flooding
 - i. Several invasive non-native plants that threaten wildlands in California (Cal-IPC, 2006) are already observed along CA-58 within the boundaries of the proposed project, including, but not limited to
 1. *Brassica nigra* (black mustard); Moderate ecological impact species (Cal-IPC, 2006)
 2. *Centaurea solstitialis* (yellow starthistle); High ecological impact species (Cal-IPC, 2006)
 3. *Cirsium vulgare* (bull thistle); Moderate ecological impact species (Cal-IPC, 2006)
 - ii. Community residents are already struggling to control invasive plant species. This additional impact would exacerbate this challenge.
 1. Example: *Centaurea solstitialis* (yellowstar thistle) has become established in livestock grazing areas disturbed by construction of the Coastal Branch Aqueduct. These areas surround the proposal transportation corridor (i.e., CA-58) for the project. Horses, and other nonruminant animals, grazing these plants are at significant risk of nigropallidal encephalomalacia, a permanent neurological disease.
 - iii. The method of controlling weed seed dispersal described in the proposal, "prevention" (page 6), is inadequate and inconsistent with the intended scope of the proposed project.
 - iv. Water use associated with proposed dust mitigating measures will have cumulative effects promoting the growth and distribution of invasive, non-native plants.

- v. The surrounding area is designated as a Very High Fire Hazard Severity Zone (Cal Fire, 2007). This is an issue that is of forefront on every resident's mind in this area. **The addition of another risk factor increasing wildfire threats does not benefit the immediate community.**
- b. Based on casual observation, it appears that livestock grazing only occurs occasionally in the low-lying, irrigated areas within the proposed project area. The topography and native plant palette found on other portions of the project are not consistent with requirements of livestock grazing. Continued mention of 'livestock grazing' in the project proposal suggests that the intent is to reclaim the land in non-native plant species to support domestic livestock production rather than the current native plant diversity.
- c. The significant health risks associated with inhalation of fungal spores of *Coccidioides immitis* resulting in Coccidiomycosis (Valley Fever), described in the proposal are not limited to domestic livestock, but will infect wildlife and humans (Terio et al., 2003; Shubitz, 2007; CDC, 2010). Methods to prevent inhalation of airborne fungal spores by workers, residents, tourists, as well as animals in the impacted area due to the disruptive mining activities proposed have not been clearly defined. Monitoring, treatment and compensation for production losses resulting from Coccidiomycosis infections throughout the proposed project duration have not been clearly addressed.

Air Quality

The proposed project will:

1. Violate any state or federal ambient air quality standard, or exceed air quality emission thresholds as establish by County Air Pollution Control District
 - a. Proposed mitigation of fugitive dust includes increased use of water applied via trucks or sprinkler systems, which is inconsistent with statewide water conservation efforts. Total volume of water required for this application, the cumulative impact on local water resources and management of resulting effluent should be determined and addressed.
2. Expose any sensitive receptor to substantial air pollutant concentrations
 - a. Although the project proposal states that the site is "sufficiently far from sensitive receptors", it is immediately adjacent to residential rural communities. The movement of air pollutants will exacerbate this exposure by prevailing winds from the proposed project site through Calf Canyon and up the residential community of Parkhill Road. Additionally, there are significant impacts created by this project beyond the site. These include, but are not limited to, **air pollution, particulate matter and diesel exhaust from more than 200 truck trips daily to and from the site that pass within 1000 feet of multiple residential units, schools (Santa Margarita Elementary School), sports fields (Herb Brazzi Field), parks (Santa Margarita Community Park; Santa**

- Margarita Community Forestry Demonstration Forest), as well as livestock operations.
- b. The significant human health risks associated with inhalation of fungal spores of *Coccidioides immitis* resulting in Coccidiomycosis (Valley Fever) are described above. These risks would not be isolated to the proposed project site, but anyone exposed to dust generated from extracted materials, including persons in the immediately adjacent Residential Rural parcels, as well as Santa Margarita.
 - c. Draft environmental impact report of the proposed project does not accurately represent the Engineering Geology Investigation (Project SL7059-1) regarding issues associated with naturally occurring asbestos. The proposed project area is within 5 miles of candidate areas more likely to contain naturally occurring asbestos (CDOC, 2000). The Engineering Geology Investigation indicates there is a low potential for naturally occurring asbestos (NOA), a toxic air contaminant, at the site. For purposes of public health, methods of monitoring the proposed site and transportation corridor over the duration of the proposed project for NOA have not been clearly described.
3. Create or subject individuals to objectionable odors
 - a. The proposed project site is not zoned for asphalt production. These activities were "grandfathered in" at the adjacent Hanson quarry.
 - b. Changes in the topography associated with the proposed project will remove existing barriers between the residential core of the immediate area. Prevailing winds through the site will result in exposure to odors associated with asphalt production from the existing quarry (Hanson) to which residents were not previously subjected.
 - i. **The proposed project will have significant cumulative impacts on the air quality, including objectionable odors, to which residential areas are subjected.**
 4. Be inconsistent with the Districts Clean Air Plan
 5. Will potentially significantly increase Greenhouse Gas Emissions through the gaseous outputs of internal combustion engines and explosive discharges associated with the proposed project activities, and the loss of the photosynthetic capacity of the native plant vegetation. **The cumulative effect of these project-related impacts, combined with the current activities of the adjacent Hanson quarry and other existing carbon outputs have not been adequately modeled.**

Biological Resources

Studies associated with these impacts were not made available to the community prior to the 08-Jul-2010 scoping meeting held by the San Luis Obispo County Planning & Building Department.

The proposed project will:

1. **Result in a potentially significant loss of unique or special status species or their habitats**
 - a. The Sensitive Species and Habitat Survey clearly states that the proposed project will result in **“loss of excellent quality chaparral and associated seedbank of a particularly diverse native herbaceous species, including sensitive species.”**
 - b. At least two rare plant species known to be found in the proposed project area (CNPS, 2005), were not included in the Sensitive Species and Habitat Survey:
 - i. *Delphinium umbracolorum* (umbrella larkspur)
 - ii. *Eriastrum luteum* (yellow-flowered eriastrum)
 - c. Significant animal species richness is reported within the immediate area of the proposed project site. This may be, in part, due to the habitats and water sources associated with the Moreno Creek and Salinas River. Many of these animal species are not afforded legal protections but are a **part of the unique wildlife interface highly desired by area residents and visitors**, alike. In the last 12 months alone, species observed in this area include, but are not limited to:
 1. *Meleagris gallopavo* (wild turkey)
 2. *Callipepla californica* (California quail)
 3. *Ceryle alcyon* (belted kingfisher)
 4. *Cyanocitta stelleri* (Steller's jay)
 5. *Pica nuttalli* (yellow-billed magpie)
 6. *Icterus galbula bullocki* (Bullock's oriole)
 7. *Carduelis pinus* (pine siskin)
 8. *Carduelis lawrencei* (Lawrence's goldfinch)
 9. *Ursus americanus* (American black bear)
 10. *Lynx rufus* (bobcat)
 11. *Urocyon cinereoargenteus* (gray fox)
 12. *Odocoileus hemionus* (mule deer)
2. **Result in a potentially significant reduction of the extent, diversity or quality of native and other important vegetation**
 - a. The **loss of fifty mature oak trees (> 5-inch DBH)** on the proposed project site, as well as gray pines (*Pinus sabiniana*) and bigberry manzanitas (*Arctostaphylos glauca*), cannot be adequately mitigated in the lifespan of community residents impacted by this activity.
 - b. **The Sensitive Species and Habitat Survey methods are inadequate to characterize the actual plant and animal diversity at the proposed project site.**
 - i. Monthly site visits were conducted between March and September 2009, a total of 47.5 hours on-site (mean = 6.78 hrs/visit).
 - ii. Precipitation during the survey period was 45% of normal for the 2009 water year (Oct-2008 through September-2009) (NWS, 2009).
 - iii. Atypically low precipitation would result in lower germination of native plants, as well as have impacts on animal diversity observed in the area. As a result, the animal diversity measurements are

- biased and not representative of the actual diversity present at the proposed project site.
- iv. Some of these plants and/or animals not observed may be federally endangered or state listed rare species.
 - c. **Mitigation procedures described to prevent the loss of sensitive plant species (i.e., avoidance) are inadequate and inconsistent with the scope and activities proposed at this site.**
3. Have potentially significant impacts on wetland or riparian habitat
- a. **The project will produce disturbance to an ephemeral drainage and associated habitat**
 - b. The Salinas River passes through the proposed project site
 - i. The description of the Salinas River as ephemeral (i.e., lasting a very short time) may be related to the lack of precipitation at the time of the survey (see above). However, this description is not consistent with current conditions (i.e., steady flow of water observed, 26-Jul-2010). Additionally, presence of water in the river is influence by discharge from the Salinas Reservoir (Santa Margarita Lake).
 - ii. The Sensitive Species and Habitat Survey does not indicate that the water source was actually sampled for steelhead trout (*Oncorhynchus mykiss irideus*). Local residents have reported steelhead trout in portions of the Salinas River in the region of the proposed project.
 - iii. Seasonal and other influences that increase the flow of water through the Salinas River may influence the presence of other species in the watershed, including the California red-legged frog (*Rana aurora draytonii*) and California tiger salamander (*Ambystoma californiense*).
 - c. The proposed project is inconsistent with the Salinas River Area Plan, Ordinance 12. Preserve or minimize impacts to important native habitats, such as significant stands of oak woodlands, riparian vegetation an important wildlife corridors.
4. Introduce barriers to movement of resident or migratory fish or wildlife species, or factors, which could hinder the normal activities of wildlife?
- a. Mining activities, including but not limited to equipment operation, blasting, glare and nighttime lighting will have significant negative impacts on the use of the Salinas River and Moreno Creek riparian habitats as corridors for native wildlife. **The proposed activities, including increased vehicular traffic, would restrict normal patterns of wildlife movement through the region.**

Cultural Resources

The proposed project will:

1. Significantly disturb pre-historic resources

- a. It is not apparent that appropriate sources, including Chumash and other organizations representing pre-European populations were adequately consulted as part of the preparation of the Archaeological Surface Survey of the proposed project site.
- 2. Significantly disturb historic resources**
- a. The proposed project site is immediately adjacent to, will be visible from and will impact access to:
 - i. Historic Salinas River Parker Truss Bridge (Bridge No. 49-106) designed by San Luis Obispo County Surveyor A.F. Parsons and constructed by Henderson Bridge Company in 1914. **This structure was determined to be eligible for listing in the National Register of Historic Places under Criteria A and C.** The structure is significant under Criterion A as a locally important crossing of the Salinas River; it is significant under Criterion C as an excellent regional example of a Parker truss bridge. The California State Historic Preservation Office concurred with that determination in September 1985 (Carr, 2010; Caltrans, 2009).
 - ii. **The operation of more than 200 additional daily truck trips with equipment greater than 70' in length hauling loose gravel and rock traveling down/uphill on CA-58 will significantly impact the safe access to and from this historic site.**
 - b. It has been reported that the area of the proposed project site was the historic camp used during the 1940's by worker's constructing the Salinas Reservoir.
- 3. Disturb paleontological resources**
- a. The impacts of the proposed project on paleontological have not been adequately described

Geology and Soils

The proposed project will:

- 1. **Result in significant exposure to or production of unstable earth conditions, such as landslides, earthquakes, liquefaction, ground failure, land subsidence or other similar hazards.**
 - a. It has been documented that there is a moderate to high potential for ridgetop shattering at the property due to the location of portions of the quarry along ridges
 - b. Potentially significant impacts of unstable earth conditions and resulting landslides on the following have not been adequately described:
 - i. Obstruction or complete closure of CA-58, the principle access route for area residents
 - ii. Obstruction of natural drainages into Salinas River and/or Moreno Creek
- 2. Be within a California Geological Survey 'Alquist-Priolo' Earthquake Fault Zone

3. **Result in significant soil erosion, topographic changes, loss of topsoil or unstable soil conditions from project-related improvements, such as vegetation removal, grading, excavation or fill.**
 - a. It is the intent of the proposed project to result in significant soil erosion, topographic changes, loss of topsoil or unstable soil conditions from project-related improvements, such as vegetation removal, grading, excavation or fill.
4. **Significantly change rates of soil absorption, or amount or direction of surface runoff**
 - a. The proposed project activity, including clearing of native vegetation and topsoil creating bare soil conditions, changes in topography will significant change surface water conditions on the site and within the Salinas river watershed.
 - b. The proposed project is inconsistent with the Salinas River Area Plan adopted in 1996 and revised in 2003 as described in the Grading and Stormwater Management EIR
 - i. Salinas River Area Plan, Ordinance 13. Recognize the importance of the Salinas River as a natural and multi-use resource, and permit development that will minimize or avoid impacts to this resource.
5. Include structures located on expansive soils
6. **Significantly change the drainage patterns where substantial on- or off-site sedimentation/erosion or flooding may occur**
 - a. The proposed project activity, including clearing of native vegetation and topsoil creating bare soil conditions, changes in topography will significant change surface water conditions on the site and within the Salinas river watershed.
 - b. The proposed project is inconsistent with the Salinas River Area Plan adopted in 1996 and revised in 2003 as described in the Grading and Stormwater Management EIR
 - i. Salinas River Area Plan, Ordinance 13. Recognize the importance of the Salinas River as a natural and multi-use resource, and permit development that will minimize or avoid impacts to this resource.
7. **Involve potentially significant activities with the 100-year flood zone**
 - a. The proposed project activity occurs within the 100-year flood zone. This issue cannot simply be ignored by claiming the area will 'not be disturbed' over the proposed duration of the project
 - b. The proposed project is inconsistent with the Salinas River Area Plan adopted in 1996 and revised in 2003 as described in the Grading and Stormwater Management EIR
 - i. Salinas River Area Plan, Ordinance 13. Recognize the importance of the Salinas River as a natural and multi-use resource, and permit development that will minimize or avoid impacts to this resource.
8. Be inconsistent with the goals and policies of the County's Safety Element relating to Geologic and Seismic Hazards

Hazards/Hazardous Materials

The proposed project will:

- 1. Result in a risk of explosion or release of hazardous substances (e.g., oil, pesticides, chemicals, radiation) or expose people to hazardous substances**
 - a. The proposal to bring asphalt and concrete debris into Rural Lands from outside sources for recycling or other purposes is inconsistent with San Luis Obispo County Land Use Ordinance.
 - b. However, any concrete debris brought on-site may be associated with multiple hazardous materials including lead-based paints, asbestos and other potentially hazardous materials. Many of these materials are particularly hazardous when disturbed and aerosolized. No discussion or provision has been made to address the methods by which these hazardous materials will be monitored, mitigated and removed from debris to protect the human, animal and environment interests in the region
 - c. Control of nonpoint source pollution pollutants from equipment, roads, parking lots, mining areas, dust control measures are a significant impacts. These sources are of particular concern due to potential significant impact on the Salinas River watershed.
- 2. Significantly interfere with an emergency response or evacuation plan**
 - a. The proposed project site is 1.3 mile of the CalFire Forestry and Fire Protection Station, 6140 Parkhill Road, Santa Margarita CA 93453.
 - b. Emergency crews based at this location respond to incidents in Santa Margarita, along US-101 and Atascadero, among other areas.
 - c. Emergency response crews routinely utilize CA-58 as the only access between their base location and Santa Margarita.
 - d. Emergency response crews and equipment will be forced to utilize this two-lane portion of roadway along with the over 200 additional truck trips associate with the proposed activities of this project. There are no clear areas where semi-trailers can move aside to allow emergency response equipment to pass safely.
 - e. Example. Twelve emergency response vehicle trips were observed moving through this area during a single day sampling (24-Jul-2010).
 - i. These response vehicles include semi-tractors hauling bulldozers for fighting wildland fires.
 - f. **The random, but regular, interaction between CalFire emergency response vehicles and the cumulative impacts of the high truck volume proposed have not been addressed. These delays could significantly decrease emergency response time resulting in loss of life and property, as well as putting the safety of emergency response crews at unnecessary risk.**
- 3. Expose people to safety risk associated with airport flight risk**
- 4. Significantly increase fire hazard risk or expose people or structures to high fire hazard conditions**

- a. The surrounding area is designated as a Very High Fire Hazard Severity Zone (Cal Fire, 2007). The goal of fire prevention is ever present and it shapes the behavior and activities of the area residents. The addition of **another risk factor increasing wildfire threats does not benefit the immediate community.**
 - b. Increased fire hazards associated with this project would include, but are not limited to:
 - i. Operation of any internal combustion engine, particularly in close proximity to vegetation
 - ii. Sparks generated from contact of any metallic object against stone, particularly in close proximity to vegetation
 - iii. Sparks generated from contact of chains, or any metallic object on trucks traveling CA-58, a roadway designated as "Not Advisable for Trucks with Trailers" with significant curves and undulations that promote 'bottoming out'
 - iv. Use of explosives
 - v. The net increase of flammable materials, including fuel and petrochemicals
 - vi. Careless behavior (e.g., disposal of cigarettes) of individuals who are not sensitized, are unaware or not personally invested in the prevention of wildland fires.
5. Significantly create any other health hazard or potential hazard
- a. Proposed project hazards associated with Coccidiomycosis, asbestos, naturally occurring asbestos and injury associated with increased vehicular traffic are described elsewhere.

Noise

The proposed project will:

1. **Expose people to significant noise levels that exceed the County Noise Element thresholds**
 - a. The activities associate with the proposed project, including, but not limited to, truck engines, tire road noise, air braking, chains, vibrations of trailers, equipment operation, explosive blasting, blast warning signals, backup warning beepers, rock crushing and screening equipment, will all have significant negative impacts on the existing rural soundscape, as well as along the proposed transportation route through Santa Margarita.
 - b. The random nature of some 'strongly perceptible to mildly unpleasant noises' will have a significant impact on human populations, domestic livestock, companion animals and wildlife.
 - i. Example. Horses owners could suffer injury or death by a horse that was responding a random explosion or other novel sound.
 - c. Response to these noise elements will have both acute and chronic health effects.

2. **Generate significant increases in the ambient noise levels for adjoining areas**
 - a. The activities associated with the proposed project, including, but not limited to, truck engines, tire road noise, air braking, chains, vibrations of trailers, equipment operation, explosive blasting, blast warning signals, backup warning beepers, rock crushing and screening equipment, will all have significant negative impacts on the existing rural soundscape of the area.
 - b. Changes in topography associated with the proposed project will remove existing noise barriers between the residential core of the immediate area resulting in **significant cumulative audible impacts** of the existing quarry (Hanson) combined with noise levels produced by the proposed project.
 - c. There is adequate evidence that vegetation buffers are insufficient measures to mitigate noise levels from adjoining areas.
3. **Significantly expose people to severe noise or vibration**
 - a. Changes in the topography associated with the proposed project will remove existing barriers between the residential core of the immediate area resulting in **significant cumulative vibration impacts** from the existing quarry (Hanson) combined with the explosive vibrations produced by the project.

Population/Housing

The proposed project appears to have been strategically mapped to exclude the most populated areas, zoned as Residential Rural, from application materials. These residential areas are immediately surrounding and directly contact three of the proposed site boundaries. **These rural communities will be significantly impacted both directly and indirectly by the activities proposed in this project.**

The proposed project will:

1. **Significantly displace existing housing or people, requiring construction of replacement housing elsewhere**
 - a. The populace in the region of the proposed project has intentionally invested in these properties due to their unique rural and natural characteristics. Lower traffic volume, clear air, absence of noise and light pollution, open space to work with plant and animal agriculture and the wildlife interface are all desirable traits of the region that will be lost, or significantly impacted, as a result of the proposed project.
 - b. The region has already suffered significant losses in property values associated with the current economy. **The impacts of the proposed project would further undermine property values** leaving many property owners owing more than the appraised value, or with little chance within their natural lives to recover the lost property value. The community should not be asked to shoulder this additional burden.

- c. Several families in the community have cancelled plans for residential and/or property improvements, negatively impacting on local small businesses. Additionally, some families have initiated discussions of selling properties, most likely at a financial loss, should this proposed project gain approval.

Public Services/Utilities

The proposed project will:

1. **Have potentially significant impacts on fire protection (as described above)**
 - b. The proposed project site is 1.3 mile of the CalFire Forestry and Fire Protection Station, 6140 Parkhill Road, Santa Margarita CA 93453.
 - c. Emergency crews based at this location respond to incidents in Santa Margarita, along US-101 and Atascadero, among other areas.
 - d. Emergency response crews routinely utilize CA-58 as the only access between their base location and Santa Margarita.
 - e. Emergency response crews and equipment will be forced to utilize this two-lane portion of roadway along with the over 200 additional truck trips associate with the proposed activities of this project. There are no clear areas where semi-trailers can move aside to allow emergency response equipment to pass safely.
 - f. Twelve emergency response vehicle trips were observed moving through this area during a single day sampling (24-Jul-2010).
 - i. These response vehicles include semi-tractors hauling bulldozers for fighting wildland fires.
 - a. **The random, but regular, interaction between CalFire emergency response vehicles and the high volume of proposed truck activity and the resulting delays could significantly decrease emergency response time resulting in loss of life and property, as well as putting the safety of emergency response crews at unnecessary risk. This significant impact must be addressed.**
2. **Have potentially significant impacts on roads**
 - a. The only access to the proposed project site, CA-58, is clearly labeled as "Not Advisable For Trucks with Trailers" by appropriate agencies. The proposal to increase heavy load truck traffic to over 200 trips daily for the next 30 years is in direct conflict with the advisories for this road.
 - b. The impacts on the local roads extend beyond CA-58. El Camino Real and the intersection of CA-58 and US-101 will be significantly impacted by the increase in truck traffic.
 - i. The proposed project will have significant cumulative impacts on northbound El Camino Real associated with existing truck traffic from Hanson quarry.
 - ii. The proposed project will have significant cumulative impacts on existing unmitigatable traffic issues at CA-58 and US-101.
3. **Have potentially significant impacts on the Coastal Branch Aqueduct**

- a. The Coastal Branch Aqueduct that delivers water to San Luis Obispo, Santa Maria, Santa Barbara and Vandenberg Air Force Base passes directly through the proposed project site of water sources
 - b. It has not been adequately described how the aqueduct will be protected from over 200 heavy load truck trips passing over the pipeline at a specific point of entry from CA-58 into the proposed site.
 - c. A reasonable worst case scenario for potential for contamination of the water supply passing through the Coastal Branch Aqueduct on the proposed project site by the multiple activities and impacts proposed and measures to mitigate this issue have not been adequately addressed.
- 4. Have potentially significant impacts on the high pressure gas line**
- a. A reasonable worst case scenario for potential for impacts on the high pressure gas line passing in proximity to the proposed project site by the multiple activities and impacts proposed and measures to mitigate this issue have not been adequately addressed.

Recreation

The proposed project will:

- 1. Significantly affect the access to trails, parks or other recreation opportunities**
 - a. The operation of more than 200 additional daily truck trips with equipment greater than 70' in length traveling on a two-lane, rural road (CA-58) designated as "Not Advisable For Trucks with Trailers" between Santa Margarita and the proposed project site will significantly impact access to:
 - i. Vehicles hauling boats, campers, mobile homes and other vehicles traveling to and from Santa Margarita Lake County Park
 - ii. Vehicles hauling horses, motorcycles and other vehicles traveling to and from Rinconada mine and associated Bureau of Land Management areas
 - iii. Vehicles hauling off-road vehicles, horses, motorcycles, campers and other vehicles utilizing Pozo-La Panza OHV Roads and Trails of Los Padres National Forest and the Carrizo Plain National Monument.
 - iv. Buses, vans, campers and other vehicles driving along CA-58 through Calf Canyon to Shell Creek and beyond to experience the annual wildflower events
 - b. The operation of more than 200 additional daily truck trips with equipment greater than 70' in length traveling through Santa Margarita on Estrada Avenue will significantly impact access to:
 - v. Santa Margarita Elementary School
 - vi. Herb Brazzi Field
 - vii. Santa Margarita Community Park
 - viii. Santa Margarita Community Forestry Demonstration Forest

2. Significantly affect the access to other recreation opportunities

1. The operation of more than 200 additional daily truck trips with equipment greater than 70' in length traveling on a two-lane, rural road (CA-58) designated as "Not Advisable For Trucks with Trailers" between Santa Margarita and the proposed project site will significantly impact access to:
 - i. Buses, vans, and other vehicles driving to and from concert events at Pozo Saloon, social events at Ancient Peaks vineyards.

Transportation/Circulation

The presumption that a transfer of truck traffic volume from the existing Hanson quarry, accessed from El Camino Real, to the proposed project is speculative at best, cannot be substantiated, and is inadequate to clearly project the impacts in this area.

The proposed project will have significant impacts on each of the following:

1. Increase vehicle trips to local or area wide circulation system
 - a. The operation of more than 200 additional daily truck trips with equipment greater than 70' in length hauling loose gravel and rock traveling on a two-lane, rural road (CA-58) designated as "Not Advisable For Trucks with Trailers" between Santa Margarita and the proposed project site will significantly impact the local and area wide circulation system.
 - i. CA-58 is the only primary route used to access eastern regions of the county, including Pozo, Creston, California Valley
 - b. The proposed project's market area will be primarily south of Santa Margarita, with significant impacts (80% of proposed trips) through Santa Margarita and the intersection of CA-58 and US-101.
 - i. The proposed project will have significant cumulative impacts on existing unmitigatable traffic issues at CA-58 and US-101.
2. Reduce levels of service on public roadways
3. Create unsafe conditions on public roadways
 - a. **The operation of more than 200 additional daily truck trips with equipment greater than 70' in length hauling loose gravel and rock will travel through an elementary school zone (CA-58, Estrada Avenue & H Street).**
 - b. **The impacts of more than 200 additional daily truck trips with equipment greater than 70' in length hauling loose gravel and rock crossing the primary freight and passenger rail line connecting northern and southern coastal California has not been adequately addressed.**
 - i. The length of trucks (70') proposed for use in the project is incompatible with the required safe distance between the rail line and El Camino Real (50'). Trucks occupying that space waiting to turn onto El Camino Real would foul the tracks creating a significant safety issue for both road vehicles, as well as passenger and freight trains routinely passing through this crossing.

Wastewater

The proposed project will generate nonpoint source pollution pollutants from roads, parking lots, mining areas, and construction sites. The proximity of the proposed site to the Salinas River, and the presence of the proposed site within a 100-year flood hazard area are potentially significant issues.

Water

The proposed project will:

1. Significantly violate water quality standards
2. Discharge into surface waters or otherwise alter surface water quality
 - a. The proposal to utilize water to mitigate dust requires adequate analysis, including more specific information on water usage to fully determine the impacts of this practice.
 1. This practice is inconsistent with water conservation measures, including those practiced by residential communities surrounding the proposed project site.
 - b. The proposal to utilize water for facility operations requires further adequate clarification. An earlier proposal included provisions for washing extracted aggregate. The inclusion of aggregate washing within the short- or long-term scope of the proposed project would have significant impacts on water use, wastewater management and associated health and environmental impacts.
3. Change the quality of groundwater
 - a. Control of nonpoint source pollution pollutants from equipment, roads, parking lots, mining areas, and dust control measures are significant impacts. These sources are of particular concern due to potential significant impact on the Salinas River watershed.
4. Change the quantity or movement of available surface or ground water
 - a. The potentially significant impacts of blasting, and other potentially seismic activities on water table and potential diversion of ground water sources have not been adequately described.
 - b. The proposed project site is downstream of Moreno Creek, near the point where the creek empties into the Salinas River. Residents occupying the immediately adjacent Residential Rural zoned parcels (Parkhill Road) draw water from these ground water sources. The Parkhill Road area has historically been known to have variable water availability. In years with low annual rainfall, some residents are forced to truck water into their properties from commercial suppliers. As a result, residents in this region have adopted a number of water conserving practices to protect this valued resource. The additional demands of this proposed project, and its location in relation to the primary residential area, will put our individual

existing water resources at significant risk and potentially reduce or eliminate available water from current wells.

1. The activities of this proposed project would not be consistent with, promote or reinforce state and regional water conservation programs.

Land Use

1. **The proposed project will be significantly inconsistent with surrounding land uses.** Although the proposed project is within the Rural Lands land use category, the impacted Residential Rural parcels are directly adjacent and border the proposed project site.
2. **Activities proposed in this project, and described throughout these scoping comments are inconsistent with the rural lifestyle, conditions and characteristics desired by the surrounding community.**

Conclusion

Two active, productive quarries (i.e., Hanson, Rocky Canyon) currently serve the North County area between Cuesta Grade and Atascadero. A community-based need for a third quarry producing similar materials in this small region has not been adequately, and objectively defined.

A presumption that the proposed project would create competition, and result in a net reduction in business activity at the Hanson quarry has not been substantiated. Hanson quarry management would unlikely allow their business to be eroded in such a manner.

After reviewing this proposed project, and the overwhelming list of significant impacts on individuals, the community and our environment clearly defined in the Draft Environmental Impact Report, I am faced with two questions:

“How is the proposed project “Promoting the Wise Use of Land”?

The proposed project will directly result in significant loss of scenic views; loss of habitat; loss of plant and animal species diversity and numbers; potential impacts on Salinas river watershed; increased use of water in a drought-stricken region and state; increased risk of wildland fire in Very High Fire Hazard Severity Zone, and

How is the proposed project “Helping to Build Great Communities”?

The proposed project will directly result in significant increases of heavy vehicle traffic on roads not intended (or recommended) for such purposes; reductions response time for emergency vehicles; restrictions of access to public lands and natural areas; reductions of air quality around our homes, parks and schools; increases of noise, as well as air pollution with dust, emissions, pathogens and contaminants in a rural setting; resulting in a community-wide loss of property values and loss of quality of rural life.

References

- Cal Fire (California Department of Forestry and Fire Protection). 2007. San Luis Obispo County Fire Hazard Severity Zone Map. <http://www.fire.ca.gov>; accessed 25-Jul-2010).
- Caltrans (State of California Department of Transportation). 2009. 2008 Named Freeways, Highways, Structures and Other Appurtenances in California. http://www.dot.ca.gov/hq/tsip/hseb/products/Named_Freeways.pdf; accessed 24-Jul-2010
- Caltrans (State of California Department of Transportation). 2009. Caltrans Structure Maintenance & Investigations Historical Significance – State Agency Bridges. (http://www.dot.ca.gov/hq/structur/strmaint/hs_state.pdf; accessed 24-Jul-2010).
- Cal-IPC. 2006. California Invasive Plant Inventory. Cal-IPC Publication 2006-02. California Invasive Plant Council. Berkeley, CA.
- Carr P. 2010. <http://www.heritageshared.org/docs/salinasriverbridge.html>; accessed 24-Jul-2010.
- CDOC (California Department of Conservation). 2000. A General Location Guide for Ultramafic Rocks in California - Areas More Likely to Contain Naturally Occurring Asbestos (ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/ofr_2000-019.pdf; accessed 26-Jul-2010).
- CNPS (California Native Plant Society, San Luis Obispo Chapter). 2005. Rare and Endangered Plants of San Luis Obispo County. San Luis Obispo, CA. <http://www.cnps-slo.org>; accessed 25-Jul-2010).
- CDC (Centers for Disease Control and Prevention). 2010. Coccidiomycosis. <http://www.cdc.gov/nczved/divisions/dfbmd/diseases/coccidiomycosis>; accessed 25-Jul-2010.
- Everitt JH, et al. 2001. Remote sensing of redberry juniper in the Texas rolling plains. *J Range Management* 54:254-259.
- McLeod M. 2004. Wildflowers of Highway 58. California Native Plant Society, San Luis Obispo Chapter. San Luis Obispo, CA.
- Ritter M. 2006. Plants of San Luis Obispo. Kendall/Hunt Publishing Company. Dubuque, IA.
- Shubitz LF. 2007. Comparative aspects of Coccidioidomycosis in animals and humans. *Annals of the New York Academy of Sciences* 1111:395-403.
- Terio KA, Stalis IH, Allen JL, Stott JL, Worley MB. 2003. Coccidioidomycosis in Przewalski's horses (*Equus przewalskii*). *J Zoo and Wildlife Medicine* 34:339-345.