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Please include my comments in the documentation for scoping of the EIR for the Las Pilitas Quarry proposed project: DRC2009-00025.

Even without reviewing the applicant provided studies, common sense tells us that this is the wrong project in the wrong location. Residents of the Santa Margarita area are well aware of impacts from quarrying. They know that the cumulative impacts from adding this proposed quarry in such a problematic location would be over and beyond significant. You are hearing that over and over again in the comments you are receiving from area residents. Approval of this project would **ignore** common sense as well as the SLO County Planning's vision statement of "Where Land Use Planning decisions embody the full meaning of the County's motto: "Not for Ourselves Alone"- placing a sense of common welfare, including the welfare of future generations, above the enrichment of individuals".

The information provided in the Request For Proposal going out to the environmental firms to base their proposals on is inadequate. The information includes the Initial Study Summary which was based on the applicant provided studies. These studies contain many omissions and errors and are misleading.

The San Luis Obispo County Surface Mining Permit Review Procedure states that The Department of Planning and Building **must demonstrate** that the uses proposed are not likely to cause public health or safety problems.

Traffic

I have reviewed the applicant's traffic study in detail. So many of the serious concerns I have as a resident and traveler of the proposed route have been omitted. I have researched some of the issues that seem so obvious, but were completely overlooked in the project information, applicant provided studies, and the county initial study summary.

Common sense tells me the county would not even consider approving a proposed project that is totally dependent on trucking to conduct it's business (truck trailer combos average 60-70') that would use a route with a warning sign posted that there is just **50' between RR tracks and highway** (SR58 / El Camino Real intersection), and is a designated CA Legal Advisory Route posted **Not Advisable For Trucks With Trailers**.

Victor Mendez, administrator of the Federal Highway Administration, notes that there is little room to recover if a driver makes a mistake on a rural highway. "That's simply because of the nature of rural highways." Mendez says. "The lanes are much more narrow. You look at trees and ditches. Chances are they're closer to the roadway than they would be on an interstate." cited from The Deadliest Roads Are Rural, NPR article by Howard Berkes.

The county may not be able to prevent tractor trailer rigs that ignore this safety advisory from using this route. The county does have the discretion to deny a CUP for a proposed project that would conduct business with truck trailer combinations on SR58, a California Legal Advisory (yellow designation) route.

California Legal (State) -- Yellow Routes: Some California Legal routes are called "advisory routes." Ca Legal Advisory routes are illustrated as yellow routes on the State Truck Network Map. These routes allow California Legal trucks, which are allowed a maximum KPRA length of 40 feet; however, truckers are advised not to use advisory routes unless their KPRA is less than 40 feet. The advised length is posted on the sign, and could be 30, 32, 34, 36, or 38 feet. The most common KPRA advisory is 30 feet, like the one shown below at El Camino and SR58. It reads:
TRACTOR-SEMI OVER 30 FEET KING PIN TO REAR AXLE NOT ADVISED



The advisory system was created because Caltrans is prohibited from restricting the KPRA on these routes. A truck with a KPRA longer than that posted may not be able to stay in its lane (like everyone has been saying). Although California Legal trucks may legally travel on advisory routes, the driver is still legally responsible for unsafe off tracking.

The definition of off tracking as described in the Highway Design Manual:

“Any vehicle whether car, bus, truck, or combination tractor semi-trailer traveling around a circular curve will sweep a wider path than the width of the vehicle. The steering axle, controlled by the driver, can generally follow a circular curve, but the following axles (or trailers) will swing inward toward the center of the curve sweeping a wide path defined by the wheel tracks of the outside front wheel and the inside rear wheel.

The difference between the swept width and the vehicle width is referred to as off tracking.”

The J Street/ SR58 intersection is a particularly problematic sharp turn for trucks. It is identified on Caltrans highway map designation as an area with special restrictions.

Will the County have the legal responsibility for unsafe truck traffic and resulting accidents if they approve a project that can only conduct business with the use of trucks with trailers on a road that has been determined to be unsafe for trucks with trailers and has a warning sign "Not Advisable For Trucks With Trailers?"

Even if truck trips are reduced by continuing to revise the project description, it does not remedy the safety hazards. It only takes one truck that cannot safely maneuver this route to cause an accident resulting in a fatality.

Caltrans and County Public Works might like the concept of this proposed project based on the assumption that an additional source of material may bring competition to the market place, that could possibly result in a slight reduction in price. Regardless of these assumptions, there must be due diligence in all evaluations of traffic safety.

All traffic related impacts must be considered cumulatively with all existing and approved projects not yet built. These would include other existing quarry truck trips as well as the approved Santa Margarita Ranch Residential Ag Cluster related traffic.

The impacts of large loaded trucks and passenger traffic going through the residential streets of Santa Margarita (such as I St.) need to be analyzed as part of the EIR. Traffic will back up because of a train or more than 1 or 2 trucks clogging the road all the way back beyond the school crosswalk, and traffic will use alternate routes. This is reasonably foreseeable and will occur.

The project information does not state where or how they will be fueling equipment used on site. Fuel storage has been removed from the project description. If the project proposes to fuel by truck, this needs to be included in the traffic study. If the water supply assessment determines there is not an adequate supply for this project, will the project propose trucking water in? If so, this must be included in the traffic study along with trucking in of all necessary construction equipment and supplies.

The project information states that asphalt and concrete for recycling will be brought in by trucks that will leave with aggregate. This would be ideal, but is not a reasonable worst case scenario that all trucking of asphalt and concrete for recycling will coincide with orders for aggregate. These additional truck trips are reasonably foreseeable and must be accounted for in the traffic study.

If you read the public comments and agency responses submitted thus far, it is apparent that the project information is inadequate in communicating the actual proposed traffic trips involved with this project.

The number, type and size of trucks need to be identified in the project information in order to do an adequate traffic study.

Truck traffic specific to this project needs to be evaluated in the field by a traffic engineer.

Truck staging is not addressed in the project information. Area residents are concerned about where the trucks will wait to enter the quarry. Will the trucks be staged on other parcels along the route, in Santa Margarita, or ??? Truck staging and parking must be part of the project information. This must be addressed in the traffic study. What are the impacts of ingress and egress of proposed staging areas?

What are the impacts of the truck traffic during the morning commute hours? The nature of construction is needing the material early in the morning. This is problematic as it coincides with all the other traffic at commute hours as well as school activity.

The Applicant provided Site Distance Evaluation conducted by TPG Consulting is not adequate. Speed surveys of traffic should be conducted during the time of day that is relevant to the project generated traffic. The AM hours would be the appropriate time to do speed analysis, as this is when there is the most traffic, commuters are traveling at the greatest speeds and when there would be the greatest presence of project truck traffic.

Evacuation and emergency vehicle response delays to area incidents needs to be evaluated. The true cost of the aggregate material from a site so problematic cannot be measured in dollars alone. It is reasonably foreseeable that truck traffic generated by this project on this rural commuter road will cause accidents and some will result in fatalities.

The county has the responsibility to make sure that the studies conducted for the EIR adequately address these traffic safety concerns for all residents, commuters, tourists, and bicyclists, who use this route. The applicant provided studies are incomplete and inadequate in many areas and particularly in regards to public safety.

Population /Housing

In the Initial Study Summary 9b. Displace existing housing or people, requiring construction of replacement housing evaluation is checked as an insignificant impact.

We, like many other residents to the south and east of the project site live on parcels zoned Residential Rural. These are smaller sized parcels (our own parcel is just over 10 acres in size) that do not have the buffers of larger Rural Land parcels. We, like many others, have very real concerns that our properties will no longer be habitable if this project is approved. According to the project description and the Initial Study Summary, (which have both omitted RR zoning to the south and east), we don't even exist. **The displacement of current residents that will need to find new forms of housing is potentially significant unless you count those of us that will be displaced as insignificant.**

Noise

The applicant provided noise study discusses the county exterior noise standards and states that noise associated with "construction" is exempted by the ordinance as long as it occurs between 7AM and 9 PM weekdays and 8 AM and 5 Pm on weekends.

The applicant provided study claims that the initial phase of work which includes stockpiling of surface materials is part of construction and exempted from the ordinance.

The County Initial Study Summary states the "Initial Stage consists of installing a truck scale, portable office, access road construction and landscaping. **The production of aggregate material would start with removing and stockpiling overburden for future reclamation use, and excavating, processing and stockpiling of decomposed granite and granite rock.**" As identified by the County Initial Study Summary this should be considered part of the quarry operation, not construction, and therefore is not exempt form the noise standards. Other than the small amount to be used in reclamation this stockpiled material will be sold.

The applicant provided study also states that the County's noise standards do not apply to

agricultural land uses, and suggests that mining is an agricultural activity. **Quarry activity is a nonagricultural use as defined in Title 22.**

This type of inaccurate information is another example that the applicant provided studies are inadequate.

This proposed project is an aggregate quarry on Rural Lands. The agricultural use noise exemption does not apply to this use.

Noise impacts must be evaluated cumulatively with other noise sources such as the existing Hanson quarry.

Aesthetics

The proposed project site is located on scenic highway 58 within the scenic and sensitive Salinas River corridor, and visible from public recreational lands such as East Cuesta Ridge.

The County Framework for Planning states: Evaluation of proposed extraction operations in areas having open space, scenic, habitat, recreational, or agricultural value shall balance those values against the need for extracting mineral resources from such sites.

There are existing operations in the area with adequate sources of this material.

The reclamation plan for revegetation sounds good in theory, but is not realistic or feasible in practice. It is very difficult to revegetate a site that has been denuded and taken down to solid rock. It will be changed forever and will significantly change the aesthetic character of this scenic area of the Salinas River corridor.

Water / Biological

The State Water Resource Control Board has designated the Salinas River and its tributaries as one of the most critical watersheds in the State of California. Projects proposed in this sensitive location must be carefully studied and the impacts not taken lightly.

The impacts to water quality and quantity should be carefully studied in regards to the sensitive riparian habitat which includes habitat for the SCC steel head which is thought to be an evolutionary distinct unit.

Impacts to existing residential water wells must be studied. Blasting can disrupt water wells.

Contaminants from the quarry operation have a significant potential of polluting the nearby Salinas River, Moreno creek, subsurface flows and ground water.

The realistic water needs of this quarry project will be detrimental to the already precarious water supply in the immediate area.

A Water Supply Assessment needs to be included in the scope of this EIR.

Cultural resources

The applicant provided Cultural Resources surface survey indicated that there was no evidence of cultural materials on the property within the project activity areas. The sensitivity of the site warrants further study. All areas that may be disturbed by any and all phases of the project must be surveyed .

Land Use

The Extractive Resource Area designation of this site and many surrounding sites, is used to identify areas of the county which the California Department of Conservation's Division of Mines and Geology has classified as containing or being highly likely to contain significant mineral deposits.

This is important and should be considered when the County makes Planning decisions for the future. There are many areas within the Ex designation that are remote and do not have residential zoning adjacent to the site. The EIR should identify such areas. Good common sense planning would prevent future changes in zoning that allow new residential zoning in those areas.

The Ex designation does not remove the rights and consideration of the existing surrounding residential parcels. Not all parcels with EX designations are safe or suitable to be permitted for this use.

The asphalt/concrete recycling component of this project is not an allowed use on Rural Lands unless it is associated with a waste disposal facility. It should be removed from the project application and description. While the ordinance allows for modification of this limiting standard, the required findings cannot be made. Findings would need to be made to set forth the necessity by identifying specific conditions of the site and or vicinity which makes the standard unnecessary or ineffective. Based on the incompatibility of this use with the residences in the area because of the traffic, noise, dust, etc. these findings cannot be made.

Alternatives

Encourage current and future extraction of the large reserves of material that are present at the existing quarries in the area. These existing quarries are better sited with greater buffers from residential parcels, have safer access onto public roads, and have adequate staging for waiting trucks.

When we consider alternatives, we should keep in mind SLO County Planning's mission/vision statement:

**PROMOTING THE WISE USE OF LAND
HELPING TO BUILD GREAT COMMUNITIES**

Thank you for incorporating my comments and analyzing the additional impacts described above in the EIR.

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