



February 1, 2010

Mr. Bob Williams, Chair  
Sonoma County Planning Commission  
2550 Ventura Avenue  
Santa Rosa, CA 95403-2829  
(Via e-mail to Blake Hillegas)

Subject: Comments on the Final Environmental Impact Report for the proposed Roblar Road Quarry, Sonoma County PLP03-0094

Dear Mr. Williams,

I am submitting these comments on behalf of Russian Riverkeeper and our over 1450 members on the proposed Roblar Road Quarry. We have reviewed the DEIR, FEIR and previous comment letters from the Regional Water Quality Control Board (Waterboard) and Mactec Engineering and Consulting (Mactec).

We have the following concerns with this project:

- 1. The FEIR lacks adequate data to fully analyze all potential water quality impacts and proposed mitigations are not adequate.**
- 2. No information was presented in the DEIR, FEIR or Staff Report for this project to support the conclusions in the statement of overriding considerations.**

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We are concerned about the potential water quality impacts that were outlined in the letters from the Waterboard and Mactec. The number one impact of climate change is availability of fresh water and so these issues are of grave importance to our county's future. This project has several significant and unmitigated water quality impacts and the FEIR has not conducted adequate analysis under CEQA as outlined in the letters to the Waterboard and Mactec. The potential water quality impacts associated with the project itself and the leachate from the un-lined County landfill could negatively affect Americano Creek and the Estero Americano which is a very unique waterway supporting a wide range of terrestrial and aquatic species. Any polluted discharge into this watershed would have significant impacts due to the high level of impacts from existing land uses.

We support the concerns of the Waterboard and project opponents and urge the applicant to conduct the additional studies to adequately analyze those impacts.

**No information was presented in the DEIR, FEIR or Staff Report for this project to support the conclusions in the statement of overriding considerations.**

We are quite familiar with the aggregate supply and demand in Sonoma County so are aware that no shortage of aggregate of any grade is occurring at this time or in the foreseeable

future. We study each Sonoma County Aggregate Production Report when they are issued and have had personal communications with several aggregate suppliers due to our work on river mining. Several recent events have drastically changed the aggregate market in Sonoma County, the building bust and imports of high quality PCC and ACC aggregate from glacial deposits in British Columbia. Prior to the current building slump, the addition of imported aggregate to the market was equivalent to the entire annual demand (~ 1 million tons) for PCC and ACC grade aggregate according to the recent Aggregate Production Report. Additionally the importer, Shamrock Materials, has a 20 year contract with Polaris the producer so this will provide a stable long-term supply of high quality aggregate to the Sonoma County Market. Two other quarries just northwest of Sebastopol were granted expansion permits recently and three Russian River bar skimming projects are in the permitting pipeline with Syar's Alexander Valley project due to be heard by Supervisors in 2010. One of the issues with aggregate is distance from source to point of use due to the high cost and GHG emissions from necessary trucking of the heavy aggregate. Spatially, there are aggregate suppliers located in Petaluma, Santa Rosa, Sebastopol, lower Russian River, Healdsburg and Cloverdale so Sonoma County has aggregate sources close of all major points of use. At this time there are no documented shortages or aggregate and the future supply is well over 100% of demand.

Today building activity has declined precipitously with residential construction down 90% according to the Sonoma County Economic Development Board and commercial construction about the same. The only major building project that is ongoing is the Highway 101 widening project and the aggregate demands of that project are quite modest, the Santa Rosa to Windsor segment only required 50,000 tons of aggregate which is less than 5% of pre-recession demand levels. Given the predicted long period of economic recovery and that Sonoma County's pre-recession growth rate was less than 1%, it is impossible to see how the County will run short of gravel in the next 20 years.

This suggests that demand for local supplies of aggregate are well satisfied and demand for new sources is potentially decades away. In light of this we ask the same questions raised by project opponents in the DEIR and FEIR:

- Where is the evidence of the need to keep construction costs down – where is the data showing that aggregate has inflated the cost of construction? The FEIR has presented no evidence to support the assertion that aggregate has inflated the cost of construction.
- Where is the evidence that the Sonoma County Aggregate market has suffered any limits on supply due to the phasing out of terrace mining? The addition of the Shamrock imports of PCC and ACC aggregate has replaced over 100% of the former terrace mining production.
- Does permitting and operation of the proposed Roblar Rd quarry require the improvement in Level of Service so that no net benefit is attained as the level is degraded by the project and the project is required to bring it back to adequate safety level? If the Roblar road quarry were not permitted the Level of Service on Stony Point/ Roblar Rd would not be insufficient and the reasoning of permitting a major project that would erode the Level of Service so that they could fund improvements is circular.
- How is the complex land swap proposed for addressing Williamson Act Contract issues beneficial to the public? The land swap is not net gain since the agricultural property is still going to be operated as an agricultural operation and 4 acres of protected land will be compromised for quarry access, what has the public gained?

We do not find the Statement of Overriding Considerations offers anything for the public interest and solely serves the project applicant so reasons offered should not allow the Commission to make this finding.

In summary we do not support approval of this project since several significant water quality impacts are not fully analyzed or mitigated and this project and all alternatives offered are NOT in the publics best interest given the impacts associated with the project.

We appreciate your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Don McEnhill". The ink is dark and the signature is written in a fluid, connected style.

Don McEnhill  
Russian Riverkeeper