



POINT SAN PEDRO ROAD COALITION

"Promoting Quality of Life in our Community"

September 20, 2021

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Via email: Envplanning@marincounty.org

Re: Draft Addendum to San Rafael Rock Quarry 2009 FEIR

Dear Ms. Reid:

The Pt. San Pedro Road Coalition respectfully requests that our comments herein concerning the Draft Addendum to the San Rafael Rock Quarry 2009 FEIR (the "Draft Addendum") be considered by County staff and the Board of Supervisors with regard to SRRQ's pending application to extend mining and reclamation to 2044 (the "Project").

This letter provides important background on the incompatible land use and health risks as determined in the 2009 Final EIR of the SRRQ. We document the need for more sufficient analysis of cumulative impacts related to air quality, describe a critical need to develop a more robust, effective Marsh Restoration Plan, and outline significant concerns related to the traffic and transportation on Pt. San Pedro Road, all impacted by the proposed extension for an additional 20 years. Our comments are based on changed circumstances or substantially more severe significant impacts not identified or considered in the Draft Addendum and/or new information of substantial importance requiring new analysis. Therefore, a supplemental review or new analysis regarding these environmental impacts is required.

20 more years of land use incompatibility and cumulative health risks warrant further environmental analysis of new or more severe impacts and available mitigations

The 2009 SRRQ Final EIR identified two significant and unavoidable cumulative impacts (Cumulative Air Quality Impact C4.2-12 and Cumulative Land Use and Planning Impact C4.6-7) associated with the SRRQ's permit. The Board of Supervisors made a finding that these impacts "will remain significant after the identified mitigation measures are implemented." Nonetheless, on September 28, 2010, the Board approved the Operating Permit and Amended Reclamation Plan (ARP) upon making a finding of "overriding considerations." That is, the Board decided that the need for SRRQ products outweighed the land use incompatibility and health risks to the community.

Please consider that the current application seeking permission to extend quarrying and reclamation activities over another 20 years to 2044 will extend this same land use incompatibility and these health risks to the community for that same extended period. Our comments note changed conditions since the 2009 Final EIR that do or likely will exacerbate these same conditions warranting (i) greater environmental analysis of these

changed conditions than presented in the Draft Addendum, and (ii) requiring additional mitigation measures to address the resulting magnification of the impacts to the community from the SRRQ's inherent land use incompatibility and health risks presented by SRRQ's extended operations.

Land Use and Planning

The Draft Addendum Fails to Provide Sufficient Analysis of Cumulative Impacts

Section C4.6-7 of the Draft Addendum recognizes that “[c]ontinuing operation of the Quarry under the proposed . . . Permit and extending simultaneous phased reclamation grading under the [ARP] for another 20 years to 2044 would result in continuing significant physical incompatibility impacts with neighboring residential and recreational land uses.” As recognized by both the 2009 FEIR and the Draft Addendum, the SRRQ is incompatible with neighboring residential land uses, regardless of whether SRRQ is meeting existing permit and regulatory standards. Extending simultaneous phased reclamation grading under the ARP for another 20 years would result in continuing significant physical incompatibility impacts with neighboring residential and recreational land uses, and significant un-mitigable (including health) impacts.

The Coalition recognizes that some mitigating Conditions of Approval (COAs) in 2010 have helped to reduce noise and emissions from Quarry operations. However, their full effectiveness has not been tested when the Quarry is operating at full capacity. Since approval of the permit and ARP in 2010, the Quarry has operated at 25% - 33% of maximum production, according to SRRQ Annual Reports. Because of SRRQ's limited production over the past decade, it is no surprise that complaints have gone down. Instead of three house-shaking, dust-spreading blasts per week as was experienced in the past, more recently the average has been closer to one per month. A commensurate reduction in crushing, barge-loading and other activities on site also result in less noise, vibration and dust, and fewer complaints.

The Draft Addendum concludes "there are no projects, including past, current, and reasonably foreseeable future projects, and including future plans for the Peacock Gap neighborhood, other portions of the Point San Pedro Peninsula, and the Project site itself envisioned in the draft San Rafael General Plan 2040, that would have the potential to combine with CARP19 in a cumulative manner.” However, it failed to consider the impacts of current and future projects: the SMART train, the Transit Center relocation project, and plans for 390 new housing units plus significant commercial development at the Montecito shopping area in the recently approved San Rafael 2040 General Plan. Evaluation is needed of the impacts of these significant new conditions affecting the Pt. San Pedro Peninsula, especially on traffic patterns and volumes as well as potential additional air pollution impacts.¹ This incompatible Project will result in a new or substantially more severe significant cumulative impact if extended another 20 years with its un-mitigable health impacts, taken together with projected residential growth in the PSPR area.

Air Quality

1. Extension to Cause More Severe Air Quality Impacts Than Were Contemplated In the FEIR.

In 2009, Paul Damian, PhD, MPH, DABT, the National Practice Leader for Risk Assessment and Toxicology with SCS Engineers in Sacramento, California, and a Board-Certified Toxicologist, assessed the health risks caused by the Quarry's blasting, mining, crushing and materials transport activities. In a letter that was included in the Coalition's response to the 2009 FEIR, he identified health issues related to these activities that were inadequately addressed in the 2009 FEIR. His focus was on crystalline silica (C-silica) and diesel particulate matter (DPM) generated by quarrying that have been identified as carcinogenic and hazardous to health by

¹ The traffic impacts of these new project are addressed below in the “Traffic and Transportation” section of this comment letter.

California, federal and international health organizations such as the International Agency for Research on Cancer.

Dr. Damian distinguished between naturally occurring (“aged”) C-silica and that which is created recently by the blasting, mining, and crushing of rock that occurs at the Quarry. Generally, the latter C-silica has sharp, jagged edges while the former has smooth edges. If inhaled, the “jagged” C-silica lodges in the lungs and is not readily expelled. It accumulates causing irritation that often results in lung damage such as silicosis and cancer. C-silica created by blasting is also much more chemically reactive than aged C-silica, increasing irritation in the lungs and compounding with other carcinogens such as DPM.

A 2012 BAAQMD report stated the following:

“Research on the health effects of PM [particulate matter] is on-going. Our understanding of PM health impacts is gradually enhanced as new studies and journal articles appear at a steady rate. The new research reinforces earlier findings regarding negative impacts of PM on both respiratory and cardiovascular health, and increased rates of health impacts such as heart attacks, strokes, and premature death in response to PM exposure. However, in addition to confirming the results of earlier research, new research is also uncovering evidence of a wider range of potential health effects from exposure to PM, including, linkages to diabetes, reduced cognitive function in older adults, and oxidative damage to DNA.”

Dr. Damian prophetically pointed out that the health risk assessment improperly averaged risks over a 70-year period with the assumption that the Quarry would operate for 17 years and then cease operations for the remaining 53 years. He noted that (i) there was no commitment by SRRQ to cease operations in the 17th year (and strong reason to believe it would continue to mine indefinitely) and (ii) the FEIR does not consider the short-term health risks to individuals exposed to these contaminants during the operational timeframe, including young people and the elderly. These risks now need to be considered in depth given the proposed 20 year extension of quarry operations, which the Draft Addendum fails to do.

Neither does the Draft Addendum address whether the PM problem is exacerbated by new conditions that have arisen since the 2009 FEIR, namely the co-existence of other PM such as wildfire smoke. It acknowledges that “[s]ince completion of the 2009 FEIR, wildfire has become an urgent safety and environmental issue: with the climate warming and drying . . . wildfire behavior and wildfire risk have become more severe (State of California, 2019). The report cites State of California, 2019. Wildfires and Climate Change: California’s Energy Future. A Report from Governor Newsom’s Strike Force, April 12, 2019: <https://www.gov.ca.gov/wp-content/uploads/2019/04/Wildfires-and-Climate-Change-California%E2%80%99s-Energy-Future.pdf>. See also: <https://news.harvard.edu/gazette/story/2021/08/wildfire-smoke-linked-to-increase-in-covid-19-cases-and-deaths/> (from Aug. 15 to Oct. 15, 2020, when fire activity was greatest, daily levels of PM2.5 during wildfire days were significantly higher than on non-wildfire days, with a median of 31.2 micrograms per cubic meter of air ($\mu\text{g}/\text{m}^3$) versus 6.4 ($\mu\text{g}/\text{m}^3$). In some counties, the levels of PM2.5 on wildfire days reached extremely high levels . . . PM2.5 levels higher than 500 $\mu\text{g}/\text{m}^3$. . . Such levels are deemed “hazardous” by the U.S. Environmental Protection Agency. One of the biggest effects for cases was in nearby Sonoma County.

The CDC also advises that wildfire smoke can irritate your lungs, cause inflammation, affect your immune system, and make you more prone to lung infections, including the virus that causes COVID-19. (See https://www.cdc.gov/disasters/covid-19/wildfire_smoke_covid-19.html.)

While the Draft Addendum and Health Risk Assessment continues to suffer from the same deficiencies described by Dr. Damian in 2009, they are compounded by the failure to consider new circumstances such as climate change causing repeated exposure to wildfire smoke.

Quarrying and reclamation activities at the Quarry do not exist in a vacuum. The cumulative effects of ongoing operations, brickyard emissions, ongoing asphalt production and other operations should also have been considered.

Though air monitoring occurred during reclamation activities in 2018 and 2019 (the County denied our request to test in 2020), high PM levels occurring during wildfires were excluded from the calculations, reducing the usable data. Although no exceedances were then noted, SRRQ production was (as it is now) far below the maximum allowed, making it difficult to draw any conclusions about projected air quality when production ramps back up (which we understand is an assumption underlying SRRQ's extension request).

2. *Mitigation Measures Once Infeasible May Now Be Feasible*

Changed circumstances have rendered current mitigations insufficient. The Draft Addendum concludes that, with incorporation of the listed mitigation measures, there will be no new significant impacts during the extension. Though some of these conclusions are based on generally accepted models, we are concerned that wildfire, brickyard, Quarry and Brickyard operations may have increased health impacts on the surrounding area, and that it would be prudent to understand more fully what the impacts of fine particulates are on the surrounding community. Consequently, we request further study of those impacts and related, feasible mitigations.

It would be economically feasible to place several PM monitors in the surrounding area similar to those now used by PG&E for their fire meteorology stations. Relatively low-cost Purple Air monitors, for example, have been shown to be reasonably accurate in measuring one hour PM 2.5 levels (with EPA adjustments), particularly if their measurements are read along with wind and weather data. They could serve as canaries outside the mine by producing continuous data for determining the extent that project emissions, when combined with wildfire and other emission sources, create public health hazards. When data collected suggests that those *cumulative* emissions exceed state and federal PM 2.5 and PM10 standards, then additional compliance air quality monitors for PM 2.5 could be placed to support a more detailed analysis.

Since Purple Air monitors measure PM 10 and PM 2.5 but do not determine metals content, to allow their use, modification is needed in the current COA #69 which provides that “[p]ermittee shall fund an on-going air quality monitoring program by the County to measure ambient air quality in the vicinity of the Quarry. The monitoring shall focus on measuring respirable particulate matter (PM-10 & PM-2.5) and determining metals content of particulate matter using BAAQMD and State monitoring standards . . .”

A reasonable assumption of the Project is that there will be an increase in the demand for SRRQ products over the next several decades to satisfy a myriad of infrastructure projects relating to levee maintenance, sea level rise and other water-accessible coastal commercial projects such as SFO and Bay Area port expansion. To meet that demand, production at the Quarry will need to expand far beyond the 25% or so production levels it has averaged since 2010. There is no current operating condition that provides assurance to the public that air quality in the neighborhood surrounding the Quarry will be safe when SRRQ ramps up production to meet the demand for those projects. Because the County has demonstrated over a long period of time an inclination to presume that SRRQ operations are compliant and timely when they often are not, relying on the County to compel air testing at its discretion is imprudent. It is also unnecessary because it is feasible to devise an air quality testing plan, at reasonable cost, with measurable benchmarks related to production levels, real-time Purple Air measurements, production levels, weather, and particulate contributions from wildfires.

Therefore, the Coalition requests that COA #69 be revised to require air quality monitoring consistent with an air quality testing plan to be devised over the next 12 months by SRRQ and the County (and its technical advisors), with input from the public. We would expect that such a plan would provide real time (or close to it)

disclosure of results, and that COA #88 (which currently prohibits blasting on Spare the Air Days) would be revised to provide for no more than 24 hours' notice from BAAQMD instead of the current 48. In addition, we suggest that reclamation activities be suspended on Spare the Air Days, when production levels increase by 50% or more over those during the periods of air monitoring in 2018 and 2019, provided the BAAQMD gives a 24-hour notice.

3. Greenhouse Gas (GHG) Emissions

We concur that “a finding of consistency with the 2030 CAP may be used to determine that a project’s GHG impacts would be less than significant” (Checklist p. 2-75), and with the CAP targets for 2030 and 2045 listed in Table GHG-1 (p. 2-76), inclusive of the State goal of 80% reduction of emission by 2050, which is subsumed in the overall CAP goals (Checklist p. 2-74, and CAP p. 17, Figure 6). We request that additional mitigations be implemented to further this goal. Accepting the 2,369 tons of GHG asserted as the total Quarry project emissions, applying the 2030 CAP goals produces the following chart of reductions needed by the Quarry project to achieve consistency with Marin CAP 2030:

Year	Marin County CAP 2030 Requirements	Quarry GHG (MTCO _{2e})
2021	Baseline projection of total Quarry GHG:	2,369
2030	40% below 1990, emission reductions only	-948
	60% below 2005, sequestration added to emissions reduced	-218
	REMAINING GHG impact 2030:	1,203
2045	Pro rata emissions reductions on track to 80% by 2050	-1,569
	Additional sequestration to reach net zero carbon	-800
	REMAINING GHG impact 2045:	0

In contrast, the EIR Checklist’s proposed reductions in accordance with Table GHG-2 (p. 2-79) and accompanying formula are as follows:

Year	Supplemental EIR GHG Proposals	Quarry GHG (MTCO _{2e})
2021	Baseline projection of total Quarry GHG:	2,369

2030	60% reduction of half the total emissions REMAINING GHG impact 2030:	-711 1,658
2045	20% additional reduction of half the total emissions REMAINING GHG impact 2045:	-237 1,421

It appears that the intended GHG reductions of Marin CAP 2030 from both emission mitigation and sequestration are not being met by these proposals,. Nor is the intent of existing Mitigation Measure R4.2-3c that the project “demonstrate how reclamation-related emissions are reduced or offset such that there are no net emissions from reclamation.”

COA #41 requires that any material shipment from the Quarry to the Haystack Landing facility be by barge only, and thereby effectively eliminates the potential for the Haystack Landing facility to increase truck traffic from SRRQ. However, the impacts of increased GHG emissions from anticipated barging from the Quarry to Haystack Landing have apparently not been considered in the GHG calculations. This oversight should be addressed.

We request the following:

- A. An additional mitigation measure specifically requiring on-site sequestration through such means as wetland and woodland enhancements sufficient to achieve the sequestration goals of Marin CAP 2030 in the timeframes intended. Align the enhancements with the “post-reclamation” plan noted in Mitigation Measure R4.2.5.
- B. Modification of the proposed changes to Mitigation Measure R4.2-3c by (i) retaining the “no net emissions from reclamation” language cited above, (ii) citing of Marin CAP 2030 and State 2050 Goals as the thresholds to be achieved, rather than the specific number of tons currently proposed, (iii) requiring that project emission reductions maintain a trajectory sufficient to reach the State’s 2050 Goals, and (iv) adding the requirement that any “offsets” applied to GHG reduction, if they cannot be located on-site, support projects with demonstrable sequestration benefits located within Marin County.
- C. Modify Mitigation Measures R4.2-a and b to include the use of “renewable diesel” to reduce GHG emissions further.

The Marsh Restoration Plan

Through its Wetlands Committee, the Coalition seeks to promote the maintenance and restoration of wetlands, inlets, and the shoreline along the Point San Pedro Road corridor. To the extent that mission is successful, habitats will approach their more natural states and wildlife suited for those habitats will be more likely to thrive. The Coalition is thus naturally concerned with the 50 or so acres of marshland separating the industrial operations of the Quarry and McNears Brickyard from Pt. San Pedro Road and homes along and beyond it (the “Marsh”).

1. The Site

The Marsh is a once-impressive brackish marsh that has been degraded over the years by Quarry activity. (See 2009 DEIR pp. 4.3-8 and 4.3-33 citing the “long-standing and on-going degradation of the SRRQ marshes ...”) The 2009 FEIR summarized the potential of the Marsh as follows:

“Given the long-standing and on-going degradation of the SRRQ marshes and the fact that they are relatively small and isolated from other similar habitat, it is unlikely that they will ever again support the full suite of salt-marsh species that they once may have, no matter what measures were taken to restore them . . . This is not, however, to say that [the Marsh] would not be capable of providing relatively high value wildlife habitat were tidal circulation to be restored and were adequate buffers to be incorporated as part of the reclamation phases and post-reclamation development design.” (2009 FEIR, p. 4.3-33.)

Presently, the Marsh is in a woeful state; foul-smelling and putrid, yet visually prominent to all area residents and those who pass by on the way to popular McNears Beach Park and China Camp. It is unappealing and even when marshes close by are filled with waterfowl, few birds stop at these wetlands. When they do, they do not remain for long. And because SRRQ has recently chosen to flood the Marsh, in otherwise dry months, with seawater that does not naturally ebb and flow with the tides, the Marsh this past year has experienced an infestation of an aggressive species of mosquito that thrives in stagnant salt water, requiring the spraying of pesticides to control the infestation.

2. Selection and Implementation of the SRRQ’s Preferred Marsh Restoration Plan

In response to the comments on the Marsh in the 2009 FEIR, the Permit included Condition of Approval #113, which required SRRQ to prepare a marsh restoration plan (“MRP”). SRRQ presented the MRP to the County in 2012 (a year late) which included three restoration alternatives. Alternative 1 was full tidal restoration of the Marsh and was the preferred restoration approach. Alternative 2 involved hydrological enhancements that would have drawn water into the Marsh and created a permanent open water habitat. SRRQ rejected both of these alternatives based on flooding concerns and habitat losses associated with Alternative 1, and financial resource limitations associated with Alternative 2 (though SRRQ provided no support that Alternative 2 exceeded its financial capabilities).

An Alternative 3, not studied in the 2009 FEIR, was ultimately selected by SRRQ which was termed in the MRP as the “preferred plan” (an inapt term since only SRRQ favored it, and then based entirely on cost and ease of implementation). Alternative 3 involved no hydrological enhancement or natural tidal flow – only managed flooding through a sluice gate and the replacement of invasive plant species with native ones. The County, for its part, in derogation of its duty failed to even respond in writing to the MRP, ignored input from Marin Audubon and the Coalition questioning the likely effectiveness of Alternative 3, and simply outsourced this mitigation measure to SRRQ without providing oversight. Given SRRQ’s self-serving recommendation of the least expensive alternative, which was not the County’s preferred alternative, the County’s acquiescence to Alternative 3 was inappropriate. It would have failed the most minimal of reviews had the County performed one.

Thus, although SRRQ was required to submit a Marsh Restoration Plan containing a “detailed plan for marsh restoration, including, if necessary to achieve objectives, plans for excavation of new channels, addition of new culverts, setbacks, buffers, etc.,” the plan submitted was neither reasonably contemplated to, nor did it in fact, restore the Marsh. (Draft Add., Ex. 2, p. 34 of 49.) This condition of approval remains unsatisfied.

Moving on to implementation, the MRP contained a timeline of actions to be monitored and verified by the County as the Lead Agency. Until at least April 2019, when WRA (the consultant who had provided the original study for the 2012 MRP) was engaged to oversee and monitor the MRP, SRRQ proceeded to

implement its (not the County's) preferred alternative without verification that the selected alternative was either effective or properly implemented. Nine years into the MRP, WRA has yet to furnish a monitoring report with a detailed assessment of the Marsh's condition, any quantified extent of invasive plant decrease and native plant introduction, nor other evaluative criteria. As one example, the MRP states that "[p]lanting and seeding with native species shall occur within the same season following physical removal of infested areas." (MPR, at p. 14.) However, WRA's letter of March 1, 2019, provides advice on planting and seeding suggesting that SRRQ has failed to comply timely with even its own minimalist MRP and the County has failed to provide oversight and enforcement. These are new conditions, not anticipated in the 2009 FEIR (although they should have been considered based on past non-compliance by the Quarry and oversight failures by the County) that the Draft Addendum fails to address.

Recently (August 2021), officials from Point Blue, Sierra Club of Marin, Marin Audubon Society and the Coalition visited the site and observed extensive areas of dead vegetation and invasive plant species previously identified for elimination. The County has failed to perform its obligation to review and verify SRRQ's compliance with COA #113.

3. Marsh Restoration Plan Does Not Restore Marsh

The Draft Addendum contains the following statement:

"Appendix B of the SRRQ Reclamation Progress Report (SRRQ, 2019) shows that the vegetation management program had moderate success in limiting invasive plant distribution in the marsh from 2011 to 2019. Because marsh restoration has begun and is ongoing during Phase 1 reclamation, the deleterious effect of ongoing reclamation activities on the marsh has been reduced at the present time and, with continued implementation of the Marsh Restoration Plan, can be expected to continue to be reduced. This new information regarding the salt marshes and changed circumstances of partial restoration since certification of the 2009 FEIR demonstrates the effectiveness of identified mitigation measures in reducing the cumulatively significant impact of reclamation activities on the Project salt marshes. The Project would not alter the requirements to continue to implement the Marsh Restoration Plan and would not result in any new or substantially more severe cumulative impact on Project salt marshes." (Draft Addendum, p. 2-44.)

This excerpt demonstrates the weak basis on which the Draft Addendum concludes that the MRP should be maintained as currently designed. Nine years in, the only progress is "moderate" success at merely "limiting" the distribution of invasive plant species. The bar set by the consultant could not have been lower. The consultant seems to be so impressed that the mere beginning of Marsh restoration, with minimal objectives, has had some (unquantifiable) positive effect on the Marsh, that he concludes that no alterations are required to the MRP.

The object of a marsh restoration plan ought to be the restoration of a marsh, and the obvious question, peculiarly asked by nobody, is whether the current SRRQ-preferred approach has resulted in actual restoration. The consultant avoids the question by conflating moderate success at limiting deleterious effects with restoration – even though the general state of the Marsh is far worse than it was when the MRP began. The consultant is thereby affirming not a restoration plan, but a plan of arrested deterioration that will result in a somewhat more limited distribution of invasive plant species. This is hardly the outcome contemplated in COA #113.

4. The Present State of the Marsh Is A New Condition

The Draft Addendum concludes that extending Quarry reclamation out to 2044 will not result in changes not already anticipated in the 2009 FEIR. We disagree. The ongoing delay already resulting from the County's

lack of verification and enforcement of the MRP has accelerated the Marsh's deterioration and increased the severity of previously identified significant effects further damaging the Marsh.

The MRP should promote the creation of habitat attractive to wildlife that could be expected to populate that sort of ecosystem. While some wildlife populated the Marsh in 2012, particularly waterfowl, there is now none. The Marsh is not a "natural transition to adjacent uplands" as the MRP claimed it would and should be. It is visibly degraded and produces a stench from rotting vegetation. Implementation of the flawed MRP has failed, and the Marsh's current, worsened state is a new condition that merits reassessment.

5. Supporting Comments by Local Organizations

Comments on the Draft Addendum made by other organizations including Marin Audubon and Marin Sierra Club are consistent with the Coalition's objections to the Addendum's acceptance of SRRQ's non-restorative MRP. Marin Conservation League comments that SRRQ is years behind schedule for restoring the Marsh, and its failure to have implemented a solution allowing for natural tidal flow has resulted in dead vegetation, an absence of wildlife and resident complaints of bad odors. It recommends consideration of an alternative restoration plan. Point Blue, for its part, agreed that tidal exchange is necessary if the Marsh is to be healthy and vibrant, and further notes that a restoration plan allowing for tidal exchange into the Marsh could be combined with addressing the increasing threat of sea level rise to homes along Pt. San Pedro Road.

6. What To Do

The Coalition contends that the County failed to require SRRQ to submit a marsh restoration plan in 2012 that could reasonably be characterized as a plan to restore the Marsh in any meaningful manner. It simply acquiesced while SRRQ implemented a plan characterized principally by its inexpensiveness, but that could be expected to accomplish no more than slow the Marsh's deterioration, if even that. Then, it failed to monitor SRRQ's lack of progress on the Marsh's restoration for most of the past decade. The result is an alternately dry and putrid would-be marsh that supports no significant fauna.

The Coalition is aware that there is some question of the degree to which full natural restoration of the Marsh is practicable. Before the Quarry commenced operations over a century ago, and before residential development in the area eliminated other marshland in the Peacock Gap neighborhood and interrupted the flow of natural freshwater springs, the Marsh was part of a larger marsh system. That system cannot be recreated. However, the Marsh has retained its basic character as marshland despite the destructive effects of adjacent mining activities. It is a great irony that the enterprise quashing the Marsh's vibrancy is so well-suited to aid it – SRRQ is literally in the business of developing and maintaining infrastructure of the type that can rehabilitate the Marsh back to a healthy state. We ask that the County (along with SRRQ) make a considered determination of practicable and reasonable cost options available to restore the Marsh by working with the Coalition and the organizations mentioned below to identify those options, and implement one with proper ongoing attention.

The Coalition urges the Supervisors to reject the conclusion contained in the Draft Addendum that the continuation of the existing SRRQ preferred approach to reclaiming the Marsh constitutes no new or severe impact on the Marsh. Maintaining a restoration plan that the last decade has proven to be a failure on the basis that the mining extension does not implicate a change is irresponsible. The current MRP is no plan of restoration at all, and it is past time that the County required SRRQ to obtain some thorough and unbiased assessments on workable options for the Marsh so that an effective restoration plan can be implemented as soon as is practicable.

Traffic and Transportation

The Draft Addendum notes that, "[s]ince completion of the 2009 FEIR, dedicated bicycle lanes have been added to Point San Pedro Road for most of its length from downtown San Rafael to the Project site and beyond.

No other substantial changes to the local transportation system have occurred.” (Emphasis added.) However, there have been changes that substantially impact traffic to and from the Pt. San Pedro Road Peninsula. Furthermore, no mention is made of planned changes that will have a profound effect on traffic in the future.

The 2017 launch of the SMART train and its 2019 expansion to Larkspur notoriously increased traffic backups on Second and Third Streets, congestion that not only gridlocks the Transit Center area, but traffic westbound on PSPR especially near San Rafael High School and the Fire Station, and eastbound on 2nd Street heading to PSPR. The proposed relocation of the Transit Station may further impact PSPR traffic traveling into downtown San Rafael or accessing the freeway. Moreover, the General Plan 2040 encourages development of new Transit Center area housing which has the potential to add to traffic congestion. The recently approved Downtown Precise Plan for San Rafael calls for 390 new housing units and approximately 45,000 square feet of non-residential uses at the Montecito Commercial District (the eastern edge of this area extends to San Rafael High School on PSPR). This will increase PSPR traffic around Montecito Shopping Center, especially around the busy Union and Grand intersections. Traffic increases on PSPR will also occur with completion of the second phase of development that has begun at the Village at Loch Lomond (The Strand).

Overlooked in the Draft Addendum is the County's a proposal to reduce a stretch of Point San Pedro Road eastbound from two lanes of traffic to one. At a recent meeting, area residents expressed great concern about the safety of a single lane of traffic when Quarry trucks are traveling to the Quarry. (Despite the concerns, the County is likely to implement a pilot project of re-striping the road to simulate this change.) And, the City and County have discussed transforming the two eastbound lanes between Main and Riviera Drives into a promenade that would accommodate wider sidewalks and a protected bicycle lane.

Also not considered by the Draft Addendum are 20 more years of wear and tear on the roadway from PSPR's use as a haul route for Quarry trucks. The need for asphalt for roadway maintenance was recognized and included in the initial agreement (COA #49). To maintain the road until the Quarry ceases operations and completes reclamation, the County should pursue a similar arrangement with SRRQ to cover ongoing wear and tear from quarry-related traffic.

Conclusion

We urge the Board to take appropriate actions to protect the environment and health of the residents and visitors of Marin County. To ensure that the County has thoroughly examined the environmental impacts of this incompatible industrial operation, supplemental review regarding the environmental impact issues outlined herein is needed. We request detailed responses to each of our requests and recommendations, and that they be made in plain language understandable to the public and our elected representatives to the extent practicable.

Thank you for giving these matters your full consideration.

Sincerely yours,



Bonnie Marmor
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