



SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

May 19, 2023

Pacifica Planning Commission
540 Crespi Drive
Pacifica, CA 94044
Via email to publiccomment@pacifica.gov
Cc: cmurdock@pacifica.gov

Subject: Recommend disapproval of the Pacifica Quarry Reclamation Plan and FEIR

The Sierra Club Loma Prieta Chapter urges you to disapprove the Pacifica Quarry Reclamation Plan and FEIR.

We are concerned about the environmental impacts of the proposed reclamation plan, especially the greenhouse gas (GHG) emissions generated by 161 truckloads of imported soil per day for 4 years.

The proposed reclamation activities are anticipated to occur over approximately four years” p.4.2-28. The project is anticipated to result in an average of approximately 161 truck trips per day” over 4 years, p. 3-16. Soil hauling to grade the Quarry site would require approximately 970,000 cubic yards of imported fill. Trucks used for soil hauling operations have a capacity ranging from 10 cubic yards (CY) to 14 CY. The Traffic Memorandum assumed trucks used for the proposed project would haul an average of 12 CY of soil per trip,” p. 3-16, *Rockaway Quarry Reclamation Plan Project, Draft Environmental Impact Report*.

This reclamation plan is unnecessary, importing almost a million cubic yards of soil from unspecified sources without any relation to a development plan. The soil to be disposed on site will be tested for contaminants by the applicant without independent third-party testing. The quarry does not need to be reclaimed unless there is a development plan and as yet no development plan has been proposed. Therefore, this reclamation plan is unnecessary and inappropriate, with high potential for unanticipated significant environmental impacts.

The EIR also includes a No Soil Hauling Alternative and a Reduced Fill Alternative

Under the No Soil Hauling Alternative, the proposed project would use the on-site soil collected from the project’s cut slopes, rather than using imported fill soils. The No Soil Hauling Alternative would nullify the trips needed to import soil to the project site. The project’s grading of slopes, installation of new trails, improvements to existing trails, addition of hazard signs filling of the Quarry Pit, regrading of loose soil, installation of new wetlands, installation of temporary and permanent culverts, and revegetation plan would all still occur under this alternative, p. 6-5, *Rockaway Quarry Reclamation Plan Project, Draft Environmental Impact Report*.

The Reduced Fill Alternative would have far less environmental impact than the proposed reclamation plan, especially in terms of GHG emissions. However, that alternative has not been analyzed in sufficient detail to be evaluated.

Under this alternative, the proposed project would implement the components of the Reclamation Plan, but with alterations to the project's filling and grading components, due to a reduction in the amount of imported fill. However, under the Reduced Fill Alternative, the minimum fill required to meet SMARA requirements and slope stability would be used. While the minimum fill would alter the amount of fill within the Quarry Pit, the alternative would still complete the remaining reclamation activities proposed under the proposed project, including the installation of new trails, improvements to existing trails, addition of hazard signs, regrading of loose soil, installation of new wetlands, installation of temporary and permanent culverts, and revegetation plan. As the alternative would use the minimum fill required to meet SMARA standards; thus, the alternative would generally be capable of meeting all of the project objectives," p. 6-18, *Rockaway Quarry Reclamation Plan Project, Draft Environmental Impact Report*. [T]he alternative's reduced amount of fill would reduce the number of trips required by trucks to import fill to the project site, as well as reduce the duration of trucks and equipment operating onsite to implement the Reclamation Plan. Therefore, the alternative would result in fewer impacts related to air quality and GHG emissions, p. 6-19, *Rockaway Quarry Reclamation Plan Project, Draft Environmental Impact Report*.

We strongly urge that a development plan be specified first so that a required reclamation plan can be prepared to implement that development plan, or that a reduced fill alternative be fully specified and evaluated for its environmental impacts especially including reduced GHG emissions as compared to the proposed reclamation plan.

An independent analysis of the FEIR found a number of ways in which the FEIR is inadequate under CEQA. (See *Grassetti Environmental Consulting report: Findings of Peer Review of Final Environmental Impact Report on The Proposed Rockaway Quarry Reclamation Plan Project*, submitted to the city of Pacifica, May 12, 2023. Copy of the report provided upon request.) A primary finding was inadequate and inaccurate air quality and GHG analyses. The air quality and GHG analyses are based on incorrect and misleading Vehicle Miles Traveled (VMT) assumptions, which results in a major underestimation of both criteria pollutant and greenhouse gas emissions.

We strongly urge the Planning Commission to find the FEIR inadequate and to not recommend approval of the quarry reclamation plan to the Pacifica City Council.

References

1. *Rockaway Quarry Reclamation Plan Project, Draft Environmental Impact Report*, February 2022, Raney Planning and Management, Inc.
2. *Grassetti Environmental Consulting report: Findings of Peer Review of Final Environmental Impact Report on The Proposed Rockaway Quarry Reclamation Plan Project*, submitted May 12, 2023 to city of Pacifica.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gladwyn d'Souza". The signature is fluid and cursive, with the first name being the most prominent.

Gladwyn d'Souza
Conservation Chair
Sierra Club Loma Prieta Chapter

Cc: Nancy Tierney, Pacifica Hillside and Coastal Protection Group
James Eggers, Executive Director, Sierra Club Loma Prieta Chapter
Peter Loeb, Former Mayor of Pacifica, Member of the Pacifica Hillside and Coastal
Protection Group