September 10, 2022

Robert Salisbury, Senior Planner

Santa Clara County Department of Planning & Development

70 W Hedding St, East Wing, 7th Floor, San Jose, CA 95110

sgtquarry.comments@pln.sccgov.org

CC: planning.commission@pln.sccgov.org, boardoperations@cob.sccgov.org

**Re: Sargent Ranch Quarry, Environmental Impact Report, SCH # 2016072058**

Dear Mr. Salisbury:

A*s* a concerned resident of Santa Clara County, I am writing to submit comments on the draft Environmental Impact Report for the proposed Sargent Ranch Quarry Project. I am an elder associated with the Social Justice Ministry of First Presbyterian Church, Palo Alto. We feel that our faith compels us to speak out about issues of Environmental and Social Injustice. We have been examining our relationships with the indigenous people of our region and support their efforts to maintain cultural integrity.

I have serious concerns regarding the proposed project’s significant and unavoidable impacts on cultural and biological resources, as well as specific aspects of the Draft Environmental Impact Report.

My specific concerns are as follows:

* **2.3 Project Objectives.** I question the assumptions used in the first objective, which states that the primary goal is to “Develop a long-term source of high-quality aggregate needed for various uses in the County and other local markets, in furtherance of General Plan Policy R-RC 68.”

According to a report from Map Sheet 52 (updated 2018), Aggregate Sustainability in California, the California Geological Survey, Department of Conservation, attached and also available online at <https://www.conservation.ca.gov/cgs/Documents/Publications/Map-Sheets/MS_052_California_Aggregates_Report_201807.pdf>, the South San Francisco Bay region, which includes Santa Clara County, has a 21-30 year supply of permitted aggregate reserves, and Monterey Bay region has a 41-50 year supply. These numbers do not take into account the increased usage of recycled sand and concrete, and government regulations, such as those in Palo Alto, that require recycling and/or reuse of materials. They also do not take into account population decline in the region. **All of these factors indicate that the proposed quarry project does not fill a short-term, or even a 30-year term, need.**

* **5.2 Significant and Unavoidable Impacts**. This section describes the following unavoidable consequences of the proposed project or Alternatives 2 and 3, even with mitigation measures.
1. **Aesthetics**: The Project would have a significant and unavoidable impact, both at the Project- specific level and cumulatively, with regard to its effect on existing visual character or quality of public views of the site and its surroundings from U.S. 101, a County-designated scenic highway (Impact 3.2-1). Mitigation Measure 3.2-1 would lessen the severity of these impacts but not below the level of significance. ). This significant unavoidable impact would also be cumulatively significant and unavoidable (Impact 3.2-3).
2. **Air Quality**: The Project would have a significant and unavoidable impact with regard to its effect on BAAQMD NOx thresholds and emissions of NOx, ROG, PM 2.5, and PM 10 for which the region is in nonattainment status. Mitigation Measures 3.3-2a and 3.3-2b would reduce NOx thresholds but emissions of NOx would not be reduced below significance thresholds for project-specific or cumulative impacts (Impacts 3.3-1, 3.3-2 and 3.3-5).
3. **Biological Resources**: The Project would have a significant and unavoidable impact with regard to the Project’s interference with wildlife movement. Mitigation Measure 3.4-15 would reduce this impact but not below the thresholds of significance (Impact 3.4-15). This significant unavoidable impact would also be cumulatively significant and unavoidable (Impact 3.4-22).
4. **Cultural and Tribal Cultural Resources**: The Project would have a significant and unavoidable impact both at the Project-specific level and cumulatively with regard to changes in the significance of tribal cultural resources within the proposed area of development, and the Juristac Tribal Cultural Landscape (Impacts 3.5-4 and 3.5-5). Mitigation Measures 3.5- 1,3.5-3b, 3.5-4b and 3.5-b would reduce the severity of these impacts, but not to a less-than- significant level.
5. **Geology, Soils, and Paleontology**: The Project would have a significant and unavoidable impact with regard to the Project’s potential to destroy paleontological resources important to Santa Clara County (Impact 3.7-5). Mitigation Measure 3.7-5 would not reduce impacts to a level of insignificance. This impact would also be considered cumulatively significant and unavoidable (Impact 3.7-6).
6. **Transportation**: The Project would have a significant and unavoidable impact with regard to the Project’s generation of additional Vehicle Miles Traveled (VMT), and no feasible mitigation is identified to reduce the impact (Impact 3.13-2). This impact would also be cumulatively significant and unavoidable (Impact 3.13-5).

**Any one of these impacts would render the proposed project unacceptable, but all six of them make it clear that it is unwise to proceed with any Quarry Project at Sargent Ranch**.

* **5.3 Irreversible Impacts**. This section states that “Upon completion of mining, the site would be returned to its previous use (cattle grazing). Mining activities would permanently change the topography and hydrology of the mining area.”

I have seen the results of reclaimed strip-mine coal operations in Indiana and the land looks nothing like it did before. I have also seen pictures of reclaimed quarries near Juristac and the results are similar.

**It is clear that any mining operation developed at Juristac would cause irrevocable ecological, cultural and spiritual harm to this sacred landscape that is of great significance to the Amah Mutsun Tribal Band and to the concerned public.**

I urge the County to reject the conditional use permit for Sargent Ranch Quarry in consideration of the significant impacts to the environment and tribal cultural resources that would result from the proposed project, and from all of the alternative projects identified in the EIR. **Considering the magnitude and wide scope of impacts and the minimal public benefit that would be afforded by the proposed mine, the “No Project Alternative” is the only acceptable course of action**.

Thank you for the opportunity to provide comments on this project. Please feel free to contact me with any questions.

Sincerely,

Patricia Kinney

Elder, First Presbyterian Church, Palo Alto

pkinney48235@gmail.com

689 Wildwood Lane

Palo Alto, CA 94303