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Director

To: Chair Phillips and Members of the Planning Commission	From: Donald Barrella Planner III
Date: August 4, 2015	Re: Syar Napa Quarry Surface Mining Permit P08-00337 Background and Discussion August 12, 2015 Commission Meeting

BACKGROUND AND DISCUSSION

A. Summary of Hearings

On January 7, 2015, the Planning Commission conducted a public hearing to consider certification of the EIR and the merits of the proposed quarry expansion and associated SMP. Prior to the hearing, comments were received on the project as well as the adequacy of the proposed Final EIR. During the hearing there were several hours of testimony presented primarily by interested parties. At the conclusion of the proceedings the Commission continued the hearing to February 18, 2015 and directed staff to: evaluate and respond to public comments; clarify potential impacts and how they were assessed; clarify the benefits and disadvantages of the project alternatives identified in the EIR; provide a hybrid project alternative for consideration; and clarify and refine proposed mitigation measures and conditions of approval.

On February 18, 2015, the Commission received additional testimony and comments from interested parties on the EIR and project. At staff's request, the Commission continued the item to the April 1, 2015 to allow staff and the consultant additional time to evaluate and respond to comments. The Commission also directed staff, at the request of interested parties, to explore the option of conducting a special evening meeting on the proposed project to allow a more convenient opportunity for the public to attend and participate in the hearing process.

On April 1, 2015, the Commission dropped the item from its agenda so that it could be renoticed for a special meeting to allow staff adequate time to evaluate the applicant's project modifications and to develop a hybrid alternative. The special meeting was scheduled for today. Public notice of the meeting was mailed, posted and published on July 11, 2015.

B. CEQA Determination

Prior to approving a project for which an EIR has been prepared, there are two procedural steps that must be satisfied under CEQA: (1) certification of the EIR; and (2) adoption of CEQA findings. A proposed Resolution certifying that the Final EIR complies with CEQA, the State CEQA Guidelines and the County's local procedures for implementing CEQA, and reflects the Commission's independent judgment and analysis, is included for the Commission's consideration and adoption (See Attachment D

of the August 12 Commission meeting report). Upon direction to Staff regarding approval of the proposed project, one of the alternatives or a combination thereof, Staff would return to the Commission at a future meeting with a resolution containing required CEQA findings.

Mitigation Measures

When an EIR identifies significant environmental impacts that may result from a project, the lead agency must make one or more of the following specific findings: (1) that changes or alterations have been required or incorporated into the project that avoid or substantially lessen the significant environmental impact identified in the EIR; (2) such changes or alterations are within the responsibility and jurisdiction of another public agency that has adopted, or can and should adopt, such changes; or (3) specific economic, social, legal, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the EIR. (CEQA Guidelines Section 15091(a).)

Attachment G (Draft Conditions of Approval July 2015) of the August 12th Commission meeting report also identifies the mitigation measures that have been incorporated into the project via the conditions of approval (see Attachment G Exhibit A for clarified mitigation measures) to avoid or substantially reduce potentially significant impacts identified in the EIR.

Project Alternatives

If the project will result in significant environmental impacts that will not be avoided or substantially lessened by mitigation measures, the lead agency must consider the environmentally superior alternatives identified in the EIR and find that they are infeasible before approving the project. (CEQA Guidelines Section 15091 (a)(3)).

Three alternatives were described in the Draft EIR: 1) No Project; 2) Reduced Production; and 3) Reduced Footprint/Conservation. The Reduced Production Alternative was identified as the environmentally superior alternative because it would reduce proposed annual production from 2 million tons per year to 1.3 million tons per year, resulting in the reduction of the identified significant unavoidable Greenhouse Gas (GHG) emissions to a less than significant level with mitigation incorporated. The Reduced Production Alternative would also reduce the potential emissions of criteria pollutants, toxic air contaminants, and dust associated with the Project primarily due to fewer vehicle and equipment miles traveled. The Reduced Production Alternative would: reduce anticipated annual water demand of the proposed project by approximately 30 acre-feet (from 50 acre-feet to approximately 20 acre-feet); reduce anticipated daily trips to the site by approximately 300 trips per day (from 500 to 200 trips) and A.M. peak hour trips by approximately 30 trips (from 51 to 21 trips) resulting in less than significant project level and cumulative traffic impacts without the need for mitigation; and further reduce project related air quality and emissions impacts, such as decreased emissions due to reduced haul trips to and from the site.

Under the Reduced Footprint/Conservation Alternative approximately 35-acres would be removed from the proposed mining footprint (see Attachment C – Alternative Analysis July 2015, of the August 12th Commission meeting report for additional details). Under this alternative the originally proposed production of 2 million tons per year would remain, therefore potential impacts that are associated with this production amount, such as, greenhouse gas emissions, air quality, noise, traffic and water use would remain the same as with the proposed project. The objective of the Reduced Footprint/Conservation Alternative is to further reduce potential impacts and effects of the proposed

project beyond the mitigated project, such as visual/aesthetic changes, biological resources, and cultural resources, whether or not such impacts are required to be mitigated or are considered to be less than significant to conserve and maintain more environmental characteristics of the site.

At the January 7th Commission hearing the Commission directed staff to develop another alternative or 'Hybrid Alternative' for their consideration that would further reduced potential adverse effects of the quarry on the surrounding community. Based on that direction staff has developed the "Reduced Production and Reduced Footprint (Hybrid) Alternative". Generally this Hybrid Alternative would reduce production levels to 1.3 million tons per year and reduce the proposed expansion area by approximately 47-acres (for a total expansion area of approximately 77-acres). This reduction would: i) preserve approximately 30-acres of oak woodlands; ii) preserve all existing Skyline Wilderness Park (SWP) trails for continued public use; iii) increase buffers and setbacks from adjacent properties and uses to reduce the degree of potential visual changes of mining and minimize the effects of noise on adjacent uses by maintain existing visual and acoustical shielding such as topographic and vegetative features; and iv) ensure the long-term production and supply of aggregate resources.

Attachment C (Alternatives Analysis, July 2015) of the August 12th Commission meeting report contains a detailed description and evaluation of the project alternatives and the Reduced Production and Reduced Footprint (Hybrid) Alternative and also provides a summary of each alternative's potential impacts as compared to the proposed project.

The Commission in its discretion has options when it comes to selecting a project alternative. The Commission as part of CEQA and SMP review may deny the project, approve the project as mitigated, or approve any one of the project alternatives in whole or in part. Furthermore the Commission can utilize components from each of the identified alternatives to create a hybrid alternative to further reduce identified impacts and/or potential negative effects of the Project to make required CEQA or SMP findings.

Commission Consideration/Recommendation

The Project alternatives would generally result in consistency with applicable General Plan Goals and Policies to varying degrees (see Attachment E of the August 12th Commission meeting report). The Commission can select alternatives to the project, or its location, which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly unless found to be infeasible.

In short the Commission in its discretion can select an alternative, combination thereof, or recommend another alternative to the proposed project that attains most of the basic objectives of the project in a feasible manner, so long as the alternative is capable of avoiding or substantially lessening any significant effects of the project.

Staff recommends that the Commission adopt the Reduced Production and Reduced Footprint (Hybrid) Alternative because it further reduces potential negative effects of the project while still meeting the objectives of the project by providing for a reliable long-term source of aggregate and aggregate related materials within the County and surrounding areas. This alternative would also be most consistent with the greatest number of applicable General Plan Goals and Polices.

Pursuant to the CEQA Guidelines (Government Code 15126.6- Consideration and Discussion of Alternatives to the Proposed Project) the Commission can select and alternatives to the project, or its location, which is capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly, can be considered by the decision making body.

In short the Commission in their discretion can select an alternative, combination thereof, or recommend another alternative to the proposed project, or to the location of the proposed project, that attains most of the basic objectives of the project in a feasible manner, so long as the alternative is capable of avoiding or substantially lessening any significant effects of the project.

Statement of Overriding Considerations

When an agency approves a project with significant environmental effects that will not be avoided or substantially reduced, it must adopt a statement that because of the project's overriding benefits, it is approving the project despite its environmental harm. This is what is commonly referred to as a Statement of Overriding Considerations (CEQA Guidelines Section 15043). A Statement of Overriding Consideration would only be necessary in the event that the Commission were to approve a production level of 2 million tons per year.

The EIR identified that the proposed production level of 2 million tons per year would result in a significant unavoidable Greenhouse Gas emission impact, and that production would need to be reduced to 1.3 million tons a year to reduce this significant unavoidable impact to a less than significant level with mitigation incorporated. Selection of a project alternative that includes an annual production limitation of 1.3 million tons per year (or less) would eliminate the need to adopt a Statement of Overriding Considerations for the project.

Final EIR

A Final EIR has been prepared and circulated. Written responses to comments received during the public review and comment period have been incorporated into the Final EIR which consists of the Draft EIR, public and agency comments, responses to comments, required clarifications and changes to the text of the Draft EIR, and the master response (Appendix B to the Final EIR: Master Responses to comments received after Publication of the November 2014 Final EIR) (see Attachment B of the August 12th Commission meeting report). The Commission also directed staff to further clarify the project alternatives analysis and develop a hybrid project alternative for consideration, as well as clarify and refine the proposed mitigation measures and draft conditions of approval: see Attachments C and G, respectively, of the August 12th Commission meeting report for these document.

The Draft EIR was circulated for public review and comment on September 6, 2013. The statutory 45 day review and comment period pursuant to CEQA was extended an additional 45 days at the request of the public, resulting in a 90 day review and comment period. The formal comment period closed on December 5, 2013. Public hearings on the Draft EIR took place on October 2, 2013 before the Planning Commission.

Subsequent to EIR certification the Commission will need to: (a) adopt findings and a statement of overriding considerations (if necessary); (b) reject project alternatives; (c) adopt the project, or alternative,

or a combination of alternatives; (d) adopt a mitigation monitoring and reporting program; and (e) render a decision on Surface Mining Permit No. P08-00337-SMP.

C. General Plan and Zoning Designations

See Attachment E (General Plan and Zoning Consistency Memo, July 2015) of the August 12th Commission meeting report for a detailed discussion and analysis.

The parcels within the Syar holding have the following General Plan Designations: Agriculture, Watershed and Open Space (AWOS); Industrial (I); and Public-Institutional (PI). While the Agricultural Preservation and Land Use (AG/LU) Element of the General Plan recognizes it is a critically important element of the General Plan it defers to the Conservation and Recreation and Open Space Elements for additional goals and *policies regarding conservation of natural areas and open space*. The Recreation and Open Space (ROS) Element includes *preservation of natural resources and the managed production of resources as one of the uses and benefits of open space*. This element further refers to the Conservation Element for *policies and actions that are intended to conserve open space lands that contain important natural resources* that are associated with open space land use benefits. Within the Conservation (CON) Element the managed production of resources is specifically identified and addressed. This element states that the *preserving open space resources to meet the community's conservation goals while also addressing local needs for productive raw natural materials requires a balanced approach and contains specific goals and policies that address open space as it pertains to the conservation of natural resources, and stresses the conservation and prudent management of the County's mineral resources for current and future generations*.

The project site has the following zoning designations: Agricultural Watershed (AW) Agricultural Watershed: Airport Compatibility (AW:AC), and Industrial (I). Pursuant to NCC Section 16.12.040 the surface mining provisions of NCC Chapter 16.12 (Surface Mining and Reclamation) apply to all unincorporated land within the county, therefore the project is allowed within the AW, AW:AC and I zoning districts, which all allow for aggregate mining and processing activities with a surface mining permit (SMP).

The current land use and zoning designations would allow for mining. Because the current land use and zoning designations allow mining neither a general plan land use re-designation nor a rezoning of the holding are necessary to accommodate the project. As such, the provisions of Measure P are not triggered and do not apply.

Furthermore, the project site, and portions thereof, are also mapped or classified by, i) the State Geologist as Resource Sector H, Mineral Resource Zone MRZ-2 (a) which indicates that significant deposits are present, and ii) by the County Land Use Map as a Mineral Resource (MR) area which is applied to known mineral resources based on mapping prepared by the State of California. These Mineral Resource designations further reinforce that mining within the project site's land use and zoning designations is a contemplated and allowed use (see Attachment E of the August 12th Commission meeting report).

D. Existing Entitlement History and Background

On November 28, 1973, the Napa County Board of Supervisors approved UP-27374 for the Napa Quarry to bring existing and future manufacturing and quarry operations at the site into compliance with the Napa County Zoning Ordinance No. 168: at that time the Basalt Rock Company owned the property. Furthermore, at that time the holding contained two asphaltic concrete (A/C) plants, a precast plant, and

a Basalite block plant¹. While the precast plant and the Basalite block plant uses have ceased and been removed, the two A/C plants remain in operation today. Furthermore, the County recognized the existence and operation of the AC plants through issuance of a building permit (#38626, August 1986) where it was confirmed that Use Permits #27374 and #128182 covered this facility. On September 22, 1981, the Board of Supervisors approved an amendment to the permit (UP-128182) to allow the operator to mine the upper reaches of the State Grey Pit in a more efficient manner. A specified end date is not indicated under these use permits because typically use permits "run with the land" in perpetuity unless the use is ceased, abandoned or revoked.

In 1982, a Reclamation Plan was developed for the Napa Quarry by Basalt Rock Company and submitted to the County for review. This Reclamation Plan was approved on December 14, 1984 (Napa County Agreement No. 2225). The County determined that the Syar Napa Quarry was consistent with County Ordinance No. 693² as part of the approval.

Under the approvals identified above the following uses associated with existing "Quarry Operations" were identified: two crushing operations which include two jaw type crushers, eight secondary crusher together with numerous screens, conveying equipment, washing and classifying equipment and two asphaltic concrete plants (also see Draft Conditions of Approval, Attachment G Figure 1 of the August 12th Commission meeting report). Based on County inspections and inspection reports of the facility from 1993 to 2013 the aforementioned Quarry Operation uses have been witnessed. Therefore it is staff's opinion that uses associated with existing Quarry Operations have been in continuous use since the original UP approval. Under these entitlements an end date to Quarry Operations and associated activities is not specified. As noted above use permits typically remain valid provided the use continues.

Regarding the cessation of mining and commencement of reclamation see "Status of Reclamation" discussion below.

With regard to the mining and reclamation boundary (or footprint), the current reclamation plan contains several exhibits identifying mining and reclamation areas. The figures that are most pertinent to boundaries are: Exhibit 3 – Areas Affect by Quarrying, Exhibit 5 - Condition of Land When Quarrying Complete, Exhibit 6 - Phasing of Mining Operations, and Exhibit 7 - Reclamation Plan. When comparing areas of mining and reclamation between these exhibits there are variations between limits shown and corresponding disturbed/mined areas shown therein, and Exhibit 5 does not include any boundary delineations. As such County staff overlaid each of these figures to determine the extent of mining and reclamation as envisioned within the current plan: this process resulted in the area identified in Figure 3-2 (Existing Conditions) of the Draft EIR (which is attached to this document). The area shown on Figure 3-2 has been determined by the County to be the limits of mining under current entitlements.

Based on inspections of the operation conducted pursuant to SMARA and County Code, and review of the Planning Division's files, there are no records of any code compliance issues on this property.

¹ Basalt Rock Quarry Environmental Impact Report, James A. Roberts Associates Inc., October 1973, Certified November 28, 1973.

² Ordinance No. 693 (October 27, 1981) originally implemented the Surface Mining and Reclamation Act of 1975 (SMARA) in Napa: the County's mining ordinance has since been codified in the County Code and is now within Chapter 16.12 (Mining and Reclamation) of the Napa Count Code.

Furthermore, pursuant to Public Contract Code Section 10295.5 and 20676 mining operations that are not being operated in compliance with SMARA are precluded from selling sand, gravel, aggregates or other mined materials to state or local agencies. Facilities that are operated in compliance with SMARA are placed on what is commonly referred to as the AB 3089 List. Therefore, having the facility maintain compliance with SMARA is necessary to provide a local source of aggregate and related materials to the County and surrounding cities: the next closest aggregate sources on the AB 3089 List are in Solano and Sonoma Counties. Currently, Syar Napa Quarry is on the AB3089 list.

Status of Reclamation

The current reclamation plan notes potential years that mining was anticipated to be completed within given areas of the quarry, however it does not include specific dates that require or otherwise mandate cessation of mining and commencement of reclamation. Use Permit #27374 and #128182 also do not specify cessation dates for Aggregate Mining Operations (i.e. areas where mineral resources or aggregate extraction occur) and the commencement of reclamation. Agreement #2225 Paragraph 5 indicates a “target date” to commence reclamation on or before July 1, 2010; however it is subject to change based on market demand.

Paragraph 5 of Agreement #2225 requires the operator to report to the County every three (3) years on the status of mining operations covered under Agreement #2225 and such report identify any of the said parcels identified in Exhibit #7 of the current Reclamation Plan³ where all mining activities have ceased as of the date of the report. The Agreement provides a presumption that where all mining activities (including but not limited to extraction, processing, stockpiling or haul roads) have ceased in any mining area identified therein for a period of three years that the mining is completed on said area and reclamation should begin. However, it is not clear in the Reclamation Plan the extent of the areas covered under this provision: Exhibit 7 does not show or otherwise contain parcels.

In a September 24, 1996, letter from the County (and accompanying Surfacing Mining Inspection Report - MRRC-1) the extent of mining activities as related to the approved bounds is questioned, in that it was believed that mining may have occurred outside the limits identified under the approved reclamation plan; however no violation was identified. This report also alludes to the amount of land that should have been reclaimed to date under current approvals. In reviewing subsequent County MRRC-1 Inspection Reports it does not appear that a violation occurred or was pursued. The July 15, 1998, inspection report identifies this issue again (a violation is noted in the report however no other County follow up documentation associated with this matter has been located). The May 31, 2000, County inspection report notes that there are questions regarding the extent of mining and boundary delineations and extent of reclamation that should have occurred; however no violations are noted in the report. This report also notes that information requested regarding this matter has been put on hold because a proposal came under study to dispose of spoils from the Napa River Flood Control Project on the site. The next available Inspection Report (May 29, 2003) is silent on these issue and no violations are noted. It is believed that because the mining boundaries identified in the Gilroy Reclamation Plan are not clearly defined (for the reasons identified above), and that exhibits within the plan were not clear to the extent of where reclamation was to commence when mining ceased, that the operation was considered to be in compliance with the current reclamation plan.

³ Reclamation Plan for the Napa Quarry, Norman T. Gilroy and Associates, May 1982.

Based on recent inspections active mining may have ceased in the State Blue Pit and Eagles Nest mining areas: active mining has not been observed in these and adjacent areas since approximately 2011. While Agreement #2225 may not be clear, taking into account Exhibit 1a (Assessor's Parcels) of the Reclamation Plan, it appears that APN 046-370-012 is an area indicated if mining has ceased reclamation should commence: this includes the State Blue Pit and Eagles Nest mining areas. The owner/operator may overcome this presumption by demonstrating to the Napa County Board of Supervisors that it intends to resume mining operations in said areas in the reasonably foreseeable future, in which event the commencement of reclamation can wait until the cessation and completion of future mining activities in that area.

In Staff's opinion the operator/Permittee has demonstrated that it intends to resume mining in the Eagles Nest area through this SMP application. However, given the owner/Permittee has reduced the proposed mining footprint by approximate 10.7-acre within the northeast corner of the property (i.e. adjacent to the State Blue) and that this mining area is currently at groundwater level, additional mining in this area would be constrained and impractical. Furthermore, since mining has not been conducted in this area since 2011 mining in the area is therefore considered ceased.

Staff is recommending that the Commission consider requiring the commencement of reclamation in the State Blue Pit area within the proposed Mining and Reclamation Plan as part of any SMP action.

E. Project Modifications Submitted by Syar

In response to concerns raised at the January 7 and subsequent Commission hearings, on March 17, 2015, Syar proposed the following modifications to the Proposed Project:

1. Reduce the proposed annual production level to 1.3 million tons per year (consistent with the Reduced Production Alternative.
2. Reductions in the size of the proposed expansion areas to include a) within the Pasini Parcel an approximate 4.5-acre reduction in the mining footprint to increase the setback buffers provided to the north and east by 50 feet, and b) within the northeast corner of the property adjacent to the State Blue Pit the approximate 10.7-acre reduction in the footprint to preserve existing trails, including the provision to develop a License Agreement with the County to allow the trails to remain in place and allow continued public use.
3. Clarify Mitigation Measure 4.11-1 so that it applies to both expansion areas and further limits mining activities in the following ways; a) limit the hours of clearing of topsoil and overburden to Monday through Friday from 6:00 AM to 9:30 PM during the construction season (June to November) and Monday through Friday 7:00 AM to 3:30 PM during the off season (December to May) ; b) limit blasting to the hours of 10 am to 4 pm with no blasting occurring on weekends or holidays; and c) within 400 feet of the property line from Skyline Wilderness Park and where such activities are visible from the trails in SWP limit topsoil and overburden removal activities to 7 am to noon (12 pm) with no such activities occurring on weekends or holidays.
4. Provide two tree planting areas within the Pasini Parcel to screen mining activities from SWP within the first two years of the Permit.: These two areas are generally located adjacent to the furthest northeast and northwest extent of the mining footprint/boundary located with the Pasini Parcel.
5. Provide 48 hour notice of blasting by website and email notice to anyone requesting such notice.

6. Suspend blasting when sustained wind speeds at the quarry exceed 20 miles per hour (See Attachment G of the August 12th Commission meeting report).

These modifications, referred to as the Modified Project, are primarily intended to reduce impacts of the project on adjacent residential and public institutional uses to the north and SWP to the east. Please refer to Attachment B of the August 12th Commission meeting report for a discussion of how these modifications would potentially affect aesthetics, noise and vibration, and air quality.

F. Responses to Comments

Since release of the Final EIR (November 2014), the County has received additional comments on the EIR. The County prepared master responses to those comments as they relate to: Aesthetics, Noise and Vibration, Air Quality, and Groundwater Hydrology (see Appendix B to the Final EIR: Master Responses to Comments Received after Publication of November 2014 Final EIR and Proposed Modifications, July 2015, included in the Commission Staff report as Attachment A).

Attachment A (Master Responses) of the August 12th Commission meeting report includes detailed technical responses to comments on the Draft and Final EIRs received from January 5 through May 31, 2015, including oral comments received at the January 7 Commission hearing, on the following topics: Aesthetics, Noise and Vibration, Air Quality and Dust, and Groundwater Hydrology. Non-technical correspondence received (letter and emails) that express general opposition or support of the project are not included in Attachment A but may be accessed from the County files for the Project at the County's Current PBES Projects webpage at (<http://www.countyofnapa.org/Syar/>).

Master responses to other potential impact categories such as biology, land use, mineral resources and production levels and demand are included in this staff report under the appropriate heading.

Summary of Master Response to Comments Document

Aesthetics- The quarry and project site is located in a transitional area of the County which accommodates a variety of uses including: more intensive residential, commercial, industrial, and public institutional uses to the north and west; intensive agriculture uses to the south; and recreational uses (Skyline Wilderness Park - SWP) to the east. The visual character in the area is highly varied and continues to experience visual changes through ongoing development in the immediate area. While the original proposal would have had a more dramatic effect on aesthetic features and shielding as viewed from the north, the project as modified would retain these features and result in less visual changes. Because the modified project would retain existing trails located east of the State Blue Pit, and these trails come into close proximity to proposed expansion areas in three limited areas the overall effect on the visual character of this area would generally be maintained, changes and alterations to the landscape and visual resources are considered less than significant.

Noise and Vibration - Noise and vibration measurements, conducted by Illingworth & Rodkin Inc. (I&R), were taken at several locations both within the quarry and at surrounding locations to record off-site and on-site levels of noise produced by quarrying activities and vibrations generated by blasting. Noise measurements were taken within the quarry itself to document noise levels resulting from stationary and mobile equipment operating within the quarry. Prominent noise sources of the quarry include: rock removal; aggregate crushing and screening operations; and operations associated with the asphaltic

concrete and the AB/Recycling plants. The calculations generally represent the worst-case scenario, which presumed project noise would occur at the furthest extent of proposed mining activities (i.e. at the limits of the proposed mining footprint in certain locations) and no topographical or vegetative shielded would be provided to surrounding receptors.

The closest receptors to the project site include the educational, public institutional, and recreational uses located to the north, which include: the Napa Office of Education, Chamberlin and Liberty High Schools, Creekside Middle School, Napa Preschool Program, Napa Child Development Center, and Napa State Hospital located to the north of the quarry; and SWP located to the north and east of the quarry. The Terrace Shurtleff and River East residential neighborhoods are located approximately 0.35 miles (or approximately 2,000 feet) north of the quarry across Imola Avenue.

Additional noise calculations based on the modified project show that the increased/additional buffers (or exclusion areas) would result in noise levels less than 50dBA L50 within the northern portions SWP (i.e. main entrance, picnic areas, archery range, disc golf area, and camping areas of the park) and in the residential uses north of the quarry, which is consistent with the County Noise Ordinance (NCC Section 8.18.070 - Exterior noise limits). The L50 acoustical descriptor represents the noise standard for a cumulative period of more than thirty minutes in any hour. This anticipated noise level would also be within the Noise Compatibility Guidelines described in General Plan Community Character Policy CC-39. As further explained in Attachment A of the August 12th Commission meeting report, noise and vibration impacts would be mitigated to less than significant levels.

Air Quality – The Air Quality and Health Risk Assessment (HRA) prepared for Draft EIR includes emissions calculations for air quality and health risk impacts resulting from the ongoing operations associated with the proposed project. The Assessment was prepared in accordance with the Bay Area Air Quality Management District (BAAQMD) Air Toxics Program Health Risk Screening Analysis Guidelines, and the Office of Environmental Health Hazard Assessment Air Toxics Hot Spots Program Guidance Manual, and Air Toxics Hot Spots Program Risk Assessment Guidelines, and includes an evaluation of cancer and non-cancer impacts of the proposed project based on a production level of 2 million tons per year. The HRA found that the project could: violate air quality standards or contribute to existing or projected air quality impacts due to Nitrogen Oxide gases (NOx), which primarily result from the combustion of petroleum in gas powered vehicles and equipment; increase fugitive dust emissions which is also referred as Particulate Matter (PM); and could expose people (or sensitive receptors) to harmful levels of toxic air contaminants (TACs) which are pollutants listed by the State that can result in increased mortality, serious illness, or pose a hazard to human health (typically industrial facilities and vehicular emissions are significant sources of TACs). The modified project, which would limit annual production to 1.3 million ton per year, would reduce potentially significant unavoidable GHG emission impacts to a less than significant level with mitigation measures incorporated, and would also significantly reduce anticipated air quality potential health risk impacts. Furthermore, proposed mitigation measures identified in the Draft EIR, as clarified in Attachments B and G of the August 12th Commission meeting report, become more rigorous as production levels incrementally increase, and would further reduce potential health risk impacts associated with NOx, PM, and TACs (including crystalline silica) to less than significant levels.

In response to recent complaints filed with the BAAQMD by local residents (March 23, 2015 and May 1, 2015) County staff has had several follow up conversations with BAAQMD inspectors⁴ to determine if violations of the BAAQMD operating permit have occurred. During these conversations BAAQMD inspectors have repeatedly stated that provisions of Syar's operating permit including dust emissions, have not been violated.

With regard to fugitive dust (PM) emissions, commenters suggest that the quarry is essentially the sole producer of PM emissions in the area, however, since 2003 approximately 300-acres of vineyard have been developed and managed immediately south of the quarry. Other potential intermittent and ongoing sources of PM emissions in the immediate area include, but are not limited to: major roadways such as Highway 221 and Imola Avenue; recent construction projects at Napa Valley College that include the performing arts and library buildings; installation of recycled waterlines along Highway 221 and Imola Avenue and construction of associated pump station along Imola Avenue (on State Hospital property); the management (including replanting activities) of over 200-acres of vineyard located immediately north of the quarry and east of the Terrace-Shurtleff and River East residential areas; demolition of the Basalite plant located immediately west of the quarry; and activities at SWP that include equestrian uses and larger events such as civil war re-enactments and expanded camping for local events such as Bottle Rock. In addition to these potential sources, future intermittent and on-going sources of dust emissions are anticipated to include, but are not limited to: the development and management of approximately 240-acres of vineyard⁵ located immediately southeast of the quarry that is anticipated to be developed over the next few years; construction of the County Jail Facility located immediately west of the quarry; the redevelopment of the Napa Pipe site located to the southwest of the quarry; and the proposed Meritage Resort Expansion (City of Napa Use Permit Application PL15-0071) for an new 134 room hotel and associated hospitality and support facilities that primarily includes construction of two (2) buildings totaling approximately 190,000 square feet. Therefore, while the quarry may be one of the larger sources of PM emissions in the area, there are other existing and anticipated sources that contribute to PM emissions in the immediate area.

Groundwater Hydrology - Commenters assert that the Draft and Final EIRs do not contain adequate information to appropriately assess potential groundwater hydrology impacts, and proposed mitigation measures pertaining to groundwater hydrogeology are not robust enough to protect or otherwise reduce potential impacts to groundwater hydrology to less than significant levels. Proposed Mitigation Measure 4.8-2 has been revised to provide clarification regarding the timing and methods of implementation, the duration and frequency of monitoring, and anticipated infiltration necessary to reduce potential groundwater impacts: see Attachments B and G of the August 12th Commission meeting report. The primary objective of Mitigation Measure 4.8-2 is to maintain a 10 foot buffer between mining activities and underlying ground levels (or potentiometric surface elevation) to avoid impacts to groundwater, including the interception of groundwater by mining and the creation of open water bodies that would subject to evaporation which could result in the additional loss (or use) of groundwater as a result of mining depth. In addition to maintaining a 10 foot buffer between mining activities and groundwater potentiometric surfaces the proposed project also limits maximum depth of mining excavations to 50 above mean sea level (msl) within the western mining areas (i.e. the State Grey and State Blue Pits and

⁴ John Lawton, Michael Wall, and Sanjeev Kmboj.

⁵ Suscol Mountain Vineyards #P09-00176-ECPA, Approved February 8, 2013, SCH#2009102079

Eagles Nest areas) and 350 feet above msl in the eastern mining areas (i.e. the Snake Pit and Pasini Parcel areas). Therefore, this measure could increase mining elevations further above msl than what is currently proposed.

With regard to anticipated water use, baseline (or existing) water use has been estimated to be approximately 140.6 acre-feet per year. Because the project well is located in the Lower Milliken-Sacco-Tulucay (MST) groundwater deficient aquifer, mitigation measures and conditions of approval have been incorporated that limit annual groundwater use at 140.6 acre-feet per year to minimize impacts on groundwater (see clarified Mitigation Measure 4.8-4 in Attachments B and G of the August 12th Commission meeting report for the full text of the measures). Comments also claim that the water use assessment is inadequate because it does not meet the requirements outlined in the California Department of Water Resources, Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001 (http://www.water.ca.gov/pubs/use/sb_610_sb_221_guidebook/guidebook.pdf).

The provisions within this Guidebook apply to projects defined by Section 10910 of the Water Code which include the following: residential development of more than 500 dwelling units; shopping center or business establishments employing more than 1,000 person or having more than 500,000 square feet (sf) of floor area; commercial office buildings employing more than 1,000 persons or having more than 250,000 sf of floor area; hotels or motels have more than 500 rooms; industrial, manufacturing, or processing plants or industrial parks housing more than 1,000 persons, occupying more than 40-acres of land or having 650,000 sf of floor area; mixed-use projects that includes one or more of the projects specified in Water Code Section 10912; or a project that would demand an amount of water equivalent to, or greater than the amount required by a 500 dwelling unit project. The water use numbers provided in the Guidebook suggest that one residential unit typically consumes .3 to .5 acre-feet of water a year. Using these factors a project using more than 150 acre-feet to 250 acre-feet per year would be subject to SB 610 and SB 221 (.3x500=150: .5x500=250).

Because the proposed project is not one of the listed project types and would not utilize more than 150 acre-feet of water per year, due to implementation of mitigation and conditions limiting water use to 140.6 acre-feet per year the water supply assessment does not necessarily need to meet the requirements found in this Guidebook. It should also be noted that SB 610 and SB 221 are companion measures which are intended to promote more collaborative planning between local water supplies and cities and counties: the quarry is not connected to a municipal water source. For these reasons staff believes that water supply and use assessment, in conjunction with proposed mitigation measures adequately disclose, assess, and mitigate potential groundwater impacts.

Furthermore, comments received on this topic do not introduce any new or additional evidence that demonstrates the potential level of impact associated with the proposed water supply and use, as mitigated and conditioned, would occur beyond what was identified in the Draft and Final EIRs.

Based on review of comments received and the Master Response document, staff and the County's consultant continue to believe that no new potentially significant impacts beyond those identified in the EIR would occur, no new or additional mitigation measures must be added to reduce impacts, and that no new information has been submitted which warrants recirculation or preparation of further technical studies, and none of the grounds for recirculation of the EIR.

Other Responses to Comments

Biological Resources - Comments received on biological resources express a concern that the project would remove valuable wildlife habitat in the area, including habitat for the mountain lion. The project area, and in particular the expansion areas, are primarily located between the existing quarry and SWP. Because of highly developed nature of land uses surrounding the quarry on three sides, the quarry itself and its history of continuous use, and use of SWP, the site and project area does not provide any vast or unaltered habitat. Biological resources surveys conducted for the project and the Draft EIR did not identify habitat in the project area suitable for mountain lions or other special-status animal species except for the American badger. Mitigation Measure 4.4-2 would address potential impacts to the American badger as a result of the Project. Furthermore, proposed Mitigation Measures 4.4-3 and 4.4-5 would address potential impacts to special-status bird and bat species that may occur in the project area or immediate vicinity.

With regard to special-status plant species, comments raise the concern that due to the timing and date of the plant surveys conducted for the Project, that not all the sensitive-status plant species that could potentially be in the area or project site could be adequately identified. Mitigation Measure 4.4-1b, requires seasonally-appropriate pre-construction plant surveys prior to the initiation of any vegetation removal or earth-disturbing activities in any undisturbed areas would reduce potential impacts to special-status plant species to less than significant levels. Regarding the California Sagebrush vegetation type that was identified in the project area, it is indicated in the Draft EIR (page 4.4-9 and -10) that this vegetation type may be similar to what is identified in the County Baseline Data Report as "Coyote brush - California Sagebrush" they were growing in alliance with the Coyote brush vegetation type that is identified to be more prevalent throughout the property. Furthermore given this vegetation type occurs only in a small isolated patch (approximately 1-acre located adjacent to active mining areas, previously disturbed areas and woodlands), its removal is not considered to be potentially significant.

With respect to oak woodlands, proposed Mitigation Measure 4.4-9 has been revised to provide clarification regarding, the timing and methods of implementation, and that on-site avoidance and replacement occur prior to initiation of vegetation removal and earth-disturbing activities in undisturbed areas. On-site avoidance and replacement would need to occur prior the commencement of any mining activities occurring in any previously undisturbed areas. Regarding off-site preservation, this mitigation measure has been revised to phase in off-site mitigation. Once 78-acres of oak woodland have been removed by future mining the Permittee will need to preserve 85-acres of off-site oak woodland prior to initiating vegetation removal and earth-disturbing activities in undisturbed areas that would remove additional oak woodlands (see Attachments B and G of the August 12th Commission meeting report for full text of this measure as revised).

General Plan and Zoning - Comments have been received suggesting that the proposed project would need either a Land Use Designation and/or Zoning Designation change, or both. As detailed above in Section C of this report and Attachment E of the August 12th Commission meeting report, mining is allowed within general plan land use and zoning designations covering the property.

G. Surface Mining Permit Findings

Pursuant to Chapter 16.12.360 (Surface Mining Permits: Issuance - Required findings) the Commission will need to make the finding below to approve the proposed SMP. Because a preferred project

alternative has not yet been selected by the Commission, findings have not yet been prepared by staff. Within Attachment F (Draft Finding) of the August 12th Commission meeting report preliminary analysis has been provided for consideration. Once a project alternative is selected formal findings will be developed for the Commission's consideration.

- a. The application is complete and the plans and reports submitted therewith adequately describe the proposed operation.
- b. The project is supported by adequate environmental documents that comply with the provisions of CEQA.
- c. The mining operation to be conducted and subsequent reclamation of the site provide for specific changes or alterations which avoid or mitigate the significant environmental effects of the project as identified in the recommended negative declaration or final EIR or if an EIR was prepared that specifically identified economic, social or other considerations make infeasible the mitigation measures or project alternatives identified therein.
- d. The application as approved demonstrates that the proposed operation will be conducted in compliance with the provisions of the Surface Mining and Reclamation Act, State Board Reclamation Regulations including but not limited to Sections 2502, 3503 and 3700-3713 of Title 14 of the California Code of Regulations, and this chapter.
- e. Any comments received from the Department of Conservation pursuant to Section 16.12.350(C) have been reviewed and considered by the Commission.
- f. The mining operation and reclamation plans, as approved, are consistent with the objectives, policies and general land uses and programs set forth in the general plan, any specific plan applicable to the area of operations, and the zoning of the site.
- g. The reclamation to be undertaken will restore the mined lands to a usable condition which is readily adaptable for alternative land uses which are consistent with the general plan and any specific plan applicable to the area of operations.
- h. Appropriate conditions have been imposed to ensure that the site, during and after reclamation, will not cause a public hazard, will not impair the character of the surrounding neighborhood, nor be detrimental to the public health, safety or general welfare, considering the degree and type of present and probable future exposure of the public to the site.
- i. The proposed timing for reclamation requires reclamation to be fully completed as soon as it is feasible, considering the particular circumstances of the site to be reclaimed, and provides for appropriate incremental reclamation at the earliest feasible time, considering the particular circumstances of the site to be reclaimed
- j. The estimated cost of the reclamation reasonably approximates the probable costs of performing the reclamation work proposed in the reclamation plan approved, the operator/permittee will be financially able to complete the reclamation, and the security to be posted will be sufficient to ensure completion of the required reclamation.
- k. The applicant has a public liability policy in force for both the mining and reclamation operation which provides for personal injury and property protection in an amount adequate to compensate all persons injured or for property damaged as a result of such operations.

H. Draft Conditions of Approval

Attachment G of the August 12th Commission meeting report includes proposed conditions of approval for the project. The Planning Commission, in its discretion, may include additional conditions or modify or delete any of the proposed conditions they feel necessary to minimize potential adverse effects of the project, whether or not those effects were determined to be potentially significant impacts, or to ensure that mineral resources are appropriately conserved for future use, or to promote the reasonable, safe and orderly operation of mining activities. Examples may include: limiting the number of days, hours or times an activity can occur, such as annually limiting blasting events or the number of times evening or weekend operations occur; requiring more County monitoring of events or operational activities; increasing or decreasing the reoccurrence interval of reporting or updating associated with on-going operations; project phasing, such as limiting the number of active mining areas within the quarry or requiring the commencement or termination of activities such as the commencement of reclamation in areas where mining has ceased.

Based on the Commission's past direction staff has clarified the proposed conditions of approval that were originally identified in the January 7, 2015 staff report. While the proposed conditions have not dramatically changed from the original iteration, a definition section was added and the hours of operation and blasting operations were further refined and separated out. The overall intent of these clarifications was to ensure that conditions could easily be understood and applied. Furthermore, the conditions were reviewed for consistency with mitigation measures and reporting requirements intervals/time frames and to eliminate redundant or duplicative conditions.

Definitions

The operator/permittee has requested the ability to operate outside the days and hours described above (i.e. operate 24 hours per day 7 days a week) so there is flexibility to accommodate such things as public transportation construction schedules, which are typically and increasingly conducted at night or non-traditional hours, as well as off-peak operations necessitated by PG&E Energy Savings Contracts. Off hour operations are anticipated to occur on a periodic basis and it not expected that the quarry would continually operate on a 24/7 basis to accommodate these activities. Condition E in Attachment G (of the August 12th Commission meeting report) provides specific details of Mining and Processing Operations and operational days and hours: Condition E is reflective of staff's recommended Hours of Operation for the quarry facility. Condition #12 contains specific definitions related to quarry operations as they relate to the hours of operation to ensure it is clear what activities can occur during specified days and hours operation and, in particular, activities that would occur during non-traditional hours off operation (i.e. from 6 PM to 7 AM).

Hours of Operation

Production and sales of aggregate and associated materials are influenced by several factors including but not limited to; weather, economic conditions, construction season, and demand. The hours of operation reflect the anticipated production levels necessary to meet demand, including that of CalTrans and other governmental agencies for nighttime transportation, infrastructure, and construction activities in order to minimize and avoid traffic congestion during daytime commute hours. It is anticipated that the quarry would typically operate approximately 250 days a year accounting for weekends, holidays, and other production breaks.

As proposed in the Draft Condition of Approval (Attachment G of the August 12th Commission meeting report), Syar Napa Quarry would typically operate Monday through Friday from 6:00 a.m. to 6:00 p.m. during the Construction Season (June through November) and from 7:00 a.m. to 3:30 p.m. during the Off Season (December to May). Furthermore, the hours of operation conditions include a provision requiring the utilization of discriminating back-up alarms or other back-up alarm system (other than traditional back-up alarms) on equipment that will be utilized for any operational activity occurring outside these hours (i.e. from 6 PM to 7 AM) to minimize noise emissions from this source. Discriminating alarm refers to a system that uses an infrared light, ultrasonic waves, radar, or similar means to detect objects or persons behind equipment, and sound an audible alarm when a person or object is detected.

Blasting

The proposed Conditions of Approval would limit Blasting Operations to weekdays from 10 AM to 3 PM with no blasting occurring on weekends or major holidays. As detailed in the Draft EIR the quarry averages approximately 26 blasts per year. It is anticipated the proposed project with incorporation of the Reduced Production Alternative could result in approximately 50 to 60 blast events a year at the maximum production level (1.3 million tons per year).

I. Production Levels, Anticipated Demand, and Potential Reserves:

As presented in the Draft EIR Air Quality and Health Risk Assessment, total baseline production level was characterized at approximately 810,000 tons per year. This total included approximately 181,000 tons per year in asphalt production and approximately 38,000 tons per year in sand production, the remainder being primarily made up of aggregate materials processed through the Blue Rock Plant and the Aggregate Base (A/B) plants or as rip-rap. Based on review of the last five State MRRC-2 Mining Operation Annual Reports the quarry processes on average approximately 400,000 to 500,000 tons of aggregate per year, excluding asphalt and sand. Average annual production of asphalt and sand is anticipated to be consistent with baseline conditions (asphalt approximately 181,000 per year and sand approximately 38,000 tons per year). As currently proposed, annual production would increase to 1.3 million tons per year with asphalt production increasing up to approximately 300,000 tons per year. Asphalt production limits would be inclusive of the overall annual production amount of 1.3 million tons per year.

It has been suggested that due to traffic characteristics shown in the Project's Traffic Impact Study (Winzler & Kelly, August 2013), in particular that approximately two-thirds of the vehicles leaving the quarry turn left (southbound) out of the quarry that a majority of the aggregate leaves the County. However, in reviewing sales records supplied by Syar for the past three years (2012 through 2014) approximately 78% of the materials sold from the Quarry in the last 3 years are used in Napa County. Specifically: in 2014, 87% of the materials sold was used in Napa County, 3% was used in Solano County, 5% was used in Sonoma County, and 5% was used in other counties; in 2013, 80% of the materials sold was used in Napa County, 4% was used in Solano County, 12% was used in Sonoma County and 4% was used in other counties; and in 2012, 68% of the materials sold was used in Napa County, 16% was used in Solano County, 13% was used in Sonoma County, and 3% was used in other counties. It should be noted that in 2012 the increased amount used in Solano County was primarily due to the Highway 12 (Jamieson Canyon Road) widening project.

While it is difficult to determine anticipated demand for aggregate materials with any certainty, a State Report⁶ includes a 50-year forecast of aggregate needs, which estimated that the per capita aggregate demand/consumption is approximately 8.8 tons annually for the region. In a 2013 update to Special Report 146 (*Special Report 205, Update of Mineral Land Classification: Aggregate Materials in the North San Francisco Bay Production-Consumption Region, Sonoma, Napa, Marin, and Southwestern Solano Counties, California*, California Geological Survey, 2013) the per capita demand slightly increased to 8.9 tons annually. Based on the population of Napa County (approximately 136,000 according to the 2010 census) this would equate to approximately 1.2 million tons of aggregate demand/consumption per year within Napa County. Special Report 205 also concluded that there were approximately 115 million tons of total aggregate reserves (i.e. permitted resources) in the North San Francisco Bay Region, and based on projected demand that reserves in the region were projected to last about 10 years (into the year 2023). It was also noted that not all of the aggregate reserves in the region may be minable under present permits because of operating restrictions and/or terms. Irrespective of individual building permits issued in Napa County, some larger projects that are anticipated to occur in the near future that are anticipated to utilize aggregate materials and asphalt include, but are not limited to: construction of the County Jail Facility; the redevelopment of the Napa Pipe site; and local road, street, and sidewalk repairs and improvements as a result of passage of Measure T. Other larger potential projects include the proposed Meritage Resort Expansion for a 134 room hotel and associated hospitality and support facilities that include construction of two buildings totaling about 190,000 square feet, and the Highway 221 flyover.

Regarding potential reserves, Special Report 146 Part III, identifies the Syar Napa Quarry and surrounding areas as within Mineral Resource Sector H. Sector H is a 1,181-acre area containing an estimated 641 million tons of aggregate, which equates to roughly 543,000 tons of aggregated per acre. Special Report 205 recalculated estimated aggregate resources within Sector H to approximately 626 million tons which results in approximately 530,000 tons of aggregate per acre. Special Report 205 also added Mineral Sector MM to the east side of Sector H: Sector MM is a 513-acre area that primarily covers the western portions of SWP the Pasini Parcel. Sector MM is anticipated to contain approximately 278 million tons of aggregate, which equates to roughly 542,000 tons of aggregate per acre. Potential reserves and estimated tons of aggregate per acre may be exaggerated because the assumptions used in these Special Reports do not take in to account allowances for overburden or waste since those factors are not known. Based on these estimations the proposed mining expansion areas (as modified by Syar) may contain up to 58,300,000 million tons of aggregate material (530,000 x 110-acres). Based on an annual extraction rate of 1.3 million tons per year the estimated reserves within the expansion areas could be expected to last approximately 45 years. As a reminder this is could be an exaggerated estimation because of the limitation of mining depths as part of the proposed project or as a result of implementation of Mitigation Measure 4.8-2.

Based on potential aggregate reserves within the proposed expansion areas, using projections and estimations from the State Special Reports, staff believes considering a production amount of up to 1.3 million tons per year over a 35 year period would be appropriate to accommodate current and potential future demand.

⁶ *Special Report 146, Part III, Mineral Land Classification: Aggregate Materials in the San Francisco - Monterey Bay Area Bay, California* Department of Conservation Division of Mines and Geology, 1987.

J. Reclamation Plan

Mining and Reclamation Plan (MRP): The proposed MRP is intended to provide for an Adaptive Management Mining Strategy for the project where active mining areas of the property would consist of no more than 25% (or approximately 218-acres) of the entire 870-acres property at any given time. Under the proposed SMP the operator would submit an initial mining plan identifying proposed mining and processing activities anticipated for the upcoming 12 months, and subsequent to the initial mining plan the operator would annually submit an update to the mining plan that would identify active mining areas and include an administrative report and revised mining site map identifying the mining and any reclamation activities completed in the past 12 months. The proposed MRP would result in greater oversight and monitoring of the facility than current entitlements, and less of the site containing active mining than current conditions: it appears that up to 57% (or 497-acres) of the holding may currently contain active mining. The annual mining plans would be reviewed by the County as part of the facility's annual inspection and financial assurance review required pursuant to SMARA and County Code Section 16.12.500 (Inspection and notice requirements).

Commission Consideration/Recommendation

The Commission in its discretion may modify components of the Mining and Reclamation plan to minimize the effects of the proposed project, make CEQA findings, or make Surface Mining Permit Findings (see below). Examples may include: requiring the commencement of reclamation in areas where mining has ceased or in not anticipated to occur, requiring the commencement of reclamation in a specified year for identified mining areas, or revising reclamation techniques or methods to take advantage of site conditions such as enhancing wetlands located along the southwest periphery of the site or ultimately converting runoff detention facilities into wetland features, which may benefit hydrologic functions of the facility after mining has been completed.

Staff is recommending that the Commission consider approval of the Mining and Reclamation Plan, as modified by the selected project alternative and including requiring the commencement of reclamation in the State Blue Pit area.

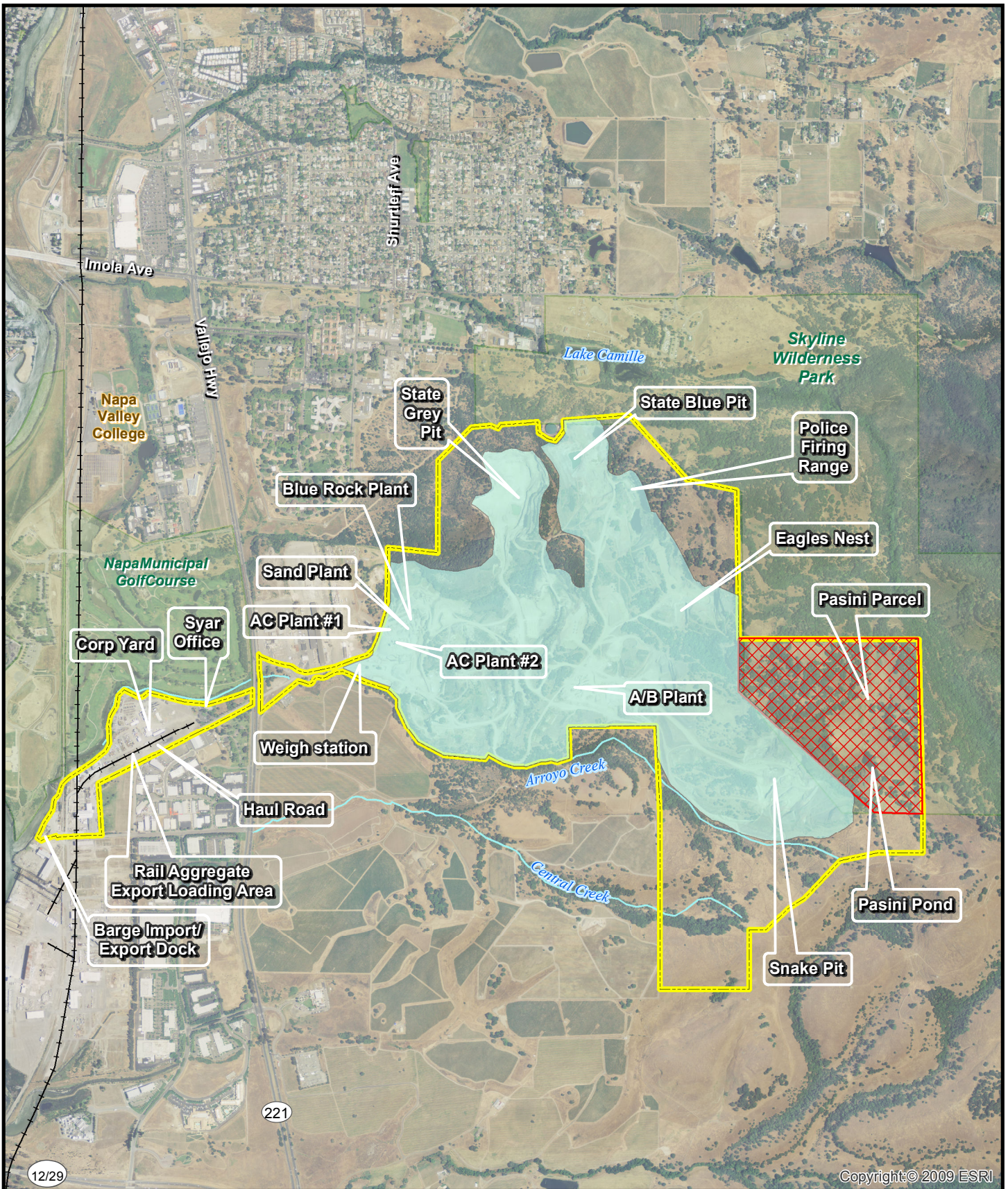
Project Documents

Documents associated with this application and staff report, including the Draft EIR, the Final EIR, and the 2012 Mining and Reclamation Plan can be accessed at <http://www.countyofnapa.org/Syar/>

Attachment

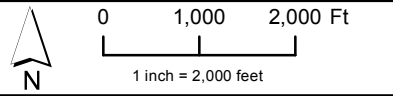
Figure 3-2 (Existing Conditions) of the Draft EIR

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Cartography: GLD/JAF

- Project Site
- Pasini Parcel
- Previously Approved Active Quarry and Processing Areas
- Parks/Open Space
- Creeks
- Railroads



Sources: ESRI - tele atlas

**Figure 3-2
Existing Conditions**

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Draft EIR
Syar Napa Quarry Expansion

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12/29