

# 3 ALTERNATIVES DESCRIPTION

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## INTRODUCTION

The California Environmental Quality Act (Public Resources Code, Section 21000 et seq.) (CEQA) and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.) require that an EIR “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6(a)). The EIR must also identify alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and should briefly explain the reasons underlying the lead agency’s determination (CEQA Guidelines Section 15126.6(c)). One of the alternatives analyzed must be the “No Project” alternative. The “No Project” alternative is the circumstance under which the project does not proceed.

The Project has been substantially revised since issuance of the Notice of Preparation (NOP) (refer to Appendix C). The Project has essentially evolved into what could have been an alternative, because Project impacts would be substantially less than otherwise would have occurred under the original project configuration. Therefore, included in this section is a description of the original project which was included in the NOP to provide the reader with an understanding of how the Project has evolved and impacts that have been avoided (the comparative impacts evaluation is in Chapter 5 Alternatives Analysis).

## ORIGINAL PROJECT AS DESCRIBED IN NOTICE OF PREPARATION

There are several changes to the proposed Project that have occurred since issuance of the Notice of Preparation (NOP). At the time of the NOP the entire area within the “Project Area” boundary, identified on Figure 2 of the NOP, was assumed to be disturbed under the Project. Subsequently, during preparation of the Biological Resources Assessment, the northern section of the Project area was found to contain a number of sensitive habitats including a large block of Callippe Silverspot Butterfly Core Habitat. The Applicant then requested a modification to the project description to exclude 82 acres from the Project so that the sensitive area would not be disturbed by mining activities. These 82 acres are currently identified in this EIR on Figure 2-3 as “Area of No New Ground Disturbance.”

In addition, the original project identified an area to the southwest of Lake Herman Road to be used for the storage of overburden. Although this site had been previously permitted for the storage of overburden, it had never been used. The use of this area has been removed from the Project. Finally, the original project description proposed an increase in the saleable aggregate and aggregate product from 3.0 (baseline conditions) to 4.0 million tons per year, with a correlated increase in extraction. This proposed increase in saleable aggregate and aggregate product is no longer part of the Project.

## DESCRIPTION OF ALTERNATIVES

### Alternative 1: No Project Alternative

Under the No Project Alternative, operation of the Quarry would continue per the existing Use Permits. Aggregate mining and sales of aggregate and aggregate products would continue through year 2014, when the existing use permit expires. After 2014 the site would be reclaimed per the 2001 Mining and Reclamation Plan. Under SMARA (Surface Mining & Reclamation Act PRR, Div 2, Ch 9, Sec 2710 et seq), reclamation is required only in those areas disturbed by surface mining on or after January 1, 1976 but not previously. Certain areas in the Quarry were disturbed by surface mining prior to 1976. Under the 2001 Mining and Reclamation Plan those areas will not be reclaimed unless the areas are subject to additional surface mining activities under the existing Use Permits. After reclamation the site would be used for open space. Under the No Project Alternative, after 2014, local construction projects would be forced to acquire aggregate product from an alternative mining facility. There is no single mining facility within 35 miles that has a permitted capacity to absorb the sales from the Lake Herman Quarry.

## **Alternative 2: Reduced Biological Impacts**

Alternative 2 would be the same Project as described in Chapter 2 Project Description, except that biological resources along the southern border of the Project site would be avoided. Mining and processing would continue in the same manner, and the pit would be expanded as shown in Figure 2-3. However, a 300-foot exclusion buffer would be established along the southern border of the Project boundary to avoid sensitive habitats that are shown in Figure 4.4-2. The buffer would begin at the native grasslands on the east side and extend around the tip of the boundary to include the marsh and wetlands on the west side.

## **ALTERNATIVES CONSIDERED BUT NOT EVALUATED IN THE EIR**

### **Off-site Alternative**

The proposed Project is an expansion of an existing facility with existing on-site infrastructure that would support the expansion. The site is designated an MRZ-2 zone by the State Mining and Geology Board meaning that “significant mineral deposits are present.” It is the only MRZ-2 site in the County. In addition, the site is designated as a “resource of regional significance” by the State Mining and Geology Board (SMGB). This means that the existing site contains a deposit of minerals that are judged to be of prime importance in meeting future needs for minerals in the region.

An off-site alternative would not meet several of the Project objectives including extending the life of an existing quarry, and providing a cost-effective and high quality aggregate product. Further, an off-site alternative at a new location could have greater impacts as all the associated elements of quarrying would need to be installed as well. In addition, an off-site alternative would shift existing quarry traffic to a new area.

### **Continued Mining within Confines of Existing Quarry Boundary**

It was briefly considered whether continued mining within the confines of the existing Quarry boundary, as defined in the existing Use Permit and 2011 Mining and Reclamation Plan, would be feasible. This would mean that mining would occur only vertically, or vertically and to the west. In order to mine vertically, mining must also occur horizontally to be able to configure the required stable bench configuration. Therefore, mining only vertically is not feasible. The existing quarry pit is already approaching the “pinching” point, where mining can no longer occur vertically without it also occurring horizontally. To the west and south of the quarry pit are existing processing areas, offices, and utility lines. The Quarry does not have the ability to relocate all of these facilities within the confines of the existing Quarry, to allow the pit to only expand to the west and south. In addition, expanding to the west and south would result in the quarry pit encroaching on the screening areas and Lake Herman Road. Therefore, expanding the pit only vertically, or only to the west and vertically, was deemed infeasible.

### **Alternate Perimeter Loop Trail**

During scoping it was suggested that the EIR “consider and analyze alternative alignments” to mitigate potential impacts to the Perimeter Loop Trail (seen in Figure 4.13.1). However, the Draft EIR did not find that the Project would impact the Perimeter Loop Trail. Therefore, there is no need to evaluate an alternative route for the trail.