

CMAC

Construction Materials
Association of California

Fresno Chapter

(Formerly known as Fresno Sand and Gravel Producers)

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June 7, 1999

Gina Francis
Fresno County Development Services Department
Development Services Division
2220 Tulare Street, 6th Floor
Fresno, CA 93721

RE: Fresno County General Plan Update – Scope of Draft EIR

Dear Ms. Francis:

On behalf of the Fresno Chapter of the Construction Materials Association of California (CMAC) I am requesting that the scope of the Draft EIR to be prepared for the Fresno County General Plan Update discuss and evaluate the economic and environmental importance of an affordable supply of aggregate construction materials. The EIR should, at a minimum, address the following points:

1. Fresno County has planned for the conservation and recovery of aggregate resources on the Kings River for almost 30 years.
 - a. The Fresno County General Plan has identified the Kings River as an important source for sand and gravel since 1969 when it adopted its General Plan for Conservation - Rock Sand and Gravel Element.
 - b. A Regional Plan for the Kings River, including the conservation and recovery of aggregate resources, has been part of the Fresno County General Plan since 1976.
 - c. In 1987 Fresno County amended the Kings River Regional Plan to include MRZ-2 zones (Mineral Resource Zone 2).
 - d. All the aggregate resources on the San Joaquin and Kings Rivers were designated of regional significance in 1988 by the State Mining and Geology Board.
2. The Conservation Element of the General Plan should recognize the need to balance the protection of natural resources and the recovery of natural resources including an affordable supply of aggregate construction materials.
3. The designated aggregate resources on the Kings River are less 1% of all farmland in Fresno County.
4. Existing permitted aggregate reserves region (estimated 86 million tons through June 1999) in the region will be depleted in 2011. This date is optimistic since all the permitted reserves may not be mineable due to expiration of existing permits. (Update of Mineral Land Classification: Aggregate Materials in the Fresno-Production-Consumption Region, Department of Conservation, Division of Mines and Geology 1999.)

5. Annual demand is projected to increase from 4.2 million tons in 1997 to 9.5 million tons in 2020. (Update of Mineral Land Classification: Aggregate Materials in the Fresno-Production-Consumption Region, Department of Conservation, Division of Mines and Geology 1999.)
6. Current annual production capacity within the region is already under the annual consumption rate.
7. There are no potential, future aggregate sites on the San Joaquin River. The parcels are too small for a viable aggregate operation and encroaching urban development precludes development of a new site.
8. The next closest aggregate source is 60 miles away in Coalinga. Prohibiting the recovery of the designated resources on the Kings River and hauling from Coalinga will have significant economic and environmental costs including; direct, indirect and induced economic adverse impacts by reducing current jobs, the loss of future jobs, loss of income and loss of tax revenue while increasing environmental and economic costs from increased vehicle miles traveled, more air emissions, increased road maintenance and greater exposure to traffic accidents. The increase in transportation costs alone (\$50 million/year) will cause the price of aggregate in the Fresno P-C Region to more than double. (Update of Mineral Land Classification: Aggregate Materials in the Fresno-Production-Consumption Region, Department of Conservation, Division of Mines and Geology 1999.)

The above points should be discussed in detail in the following sections of the EIR:

Land Use, Housing and Population:

Projections for Fresno County indicate significant population economic growth. Even compact development will require significant construction to accommodate new growth and maintain the existing built environment. Economic growth will also be necessary to reduce existing high chronic unemployment and to provide jobs for an increased population.

The projected population for this county will fuel an increase in construction and the demand for construction materials. As an example, the State Department of Conservation, Division of Mines and Geology, projects that local demand for aggregate will increase from the current 4.2 million tons in 1997 to about 9.5 million tons by 2020 or about 16.5 million tons in 50 years. (Update of Mineral Land Classification: Aggregate Materials in the Fresno-Production-Consumption Region, Department of Conservation, Division of Mines and Geology 1999.) The importance of the construction industry and its related employment to the economic development of this county will increase accordingly. Construction industry jobs required skilled labor and are traditionally well-paying jobs. Such jobs are important to keep and create in the county because of the direct, indirect and induced impacts of employment compensation to the economy.

The construction industry sector has a significant impact on the economic health of this county. The construction industry provides all our housing, roads, commercial, industrial, office, school, and agricultural construction. There are thousands of workers directly

employed in all facets of the construction industry including contractors; civil, physical, structural, professional and geotechnical engineers; geologists; hydrologists; surveyors; construction workers; equipment suppliers; construction materials suppliers; aggregate suppliers; mining operators; heavy equipment operators; ready-mix concrete plant operators; asphalt plant operators; fuel suppliers; concrete contractors; concrete finishers; asphalt pavement contractors; truck drivers; etc. There many more workers that indirectly support and are dependent the construction industry.

Existing permitted aggregate reserves region (estimated 86 million tons through June 1999) in the region will be depleted in 2011. This date is optimistic since all the permitted reserves may not be mineable due to expiration of existing permits. (Update of Mineral Land Classification: Aggregate Materials in the Fresno-Production-Consumption Region, Department of Conservation, Division of Mines and Geology 1999.)

The aggregate resources on the San Joaquin River, which have been the primary source of construction materials for almost all the construction in the Fresno region are almost depleted. The remaining permitted reserves on the San Joaquin River cannot supply the Region. There are only three major producers on the San Joaquin River. The reserves for one operation will be depleted in less than one year reducing the aggregate suppliers by one-third. The remaining two major aggregate producers cannot increase production to met the annual demand of 4 million tons in the Region due to permit restrictions, a permit expiration date in less than six years and the need to recover reserves under a plant site. There are no potential, future aggregate sites on the San Joaquin River to replace lost production. The parcels are too small for a viable aggregate operation and encroaching urban development precludes development of a new site.

Transportation:

Fresno County has more miles of roads, almost 7,000 miles, than any county in the state. The county's agricultural based economy is directly linked to a surface transportation adequate to deliver food and fiber quickly, economically and directly from farm to market. As the employment base diversifies, the need for a sound surface transportation increases. The vast majority of all products used in business, industry, construction, homes, schools, etc. are transported by truck since it is the most cost-effective and the most direct. The key ingredient to a sound transportation system is the availability of affordable construction materials for the maintenance of existing roads and the development of new transportation corridors, i.e. freeways 41, 180 and 168.

Natural Resources and Environment, and Agriculture:

The Conservation Element of the General Plan should recognize the need to balance the protection of natural resources and the recovery of natural resources including an affordable supply of aggregate construction materials. The county's agricultural based economy is directly linked to a surface transportation adequate to deliver food and fiber quickly, economically and directly from farm to market. The designated aggregate resources on the Kings River are less 1% of all farmland in Fresno County.

Fresno County has planned for the conservation and recovery of aggregate resources on the Kings River for almost 30 years. The Fresno County General Plan has identified the Kings River as an important source for sand and gravel since 1969 when it adopted its General Plan for Conservation - Rock Sand and Gravel Element. A Regional Plan for the conservation and recovery of aggregate resources on the Kings River has been part of the Fresno County General Plan since 1976.

In 1979 the County again recognized the importance of these resources as they relate to surrounding land uses when it adopted Section 306-06: Mineral Resources, a unit of the Open Space/Conservation Element of the Fresno County General Plan which states that:

"Mineral resources are valuable community assets that must be protected from competing and conflicting land uses " (306-06: 1.00).

In 1987 Fresno County amended the Kings River Regional Plan to include MRZ-2 zones (Mineral Resource Zone 2). After preparation of an EIR, including a sector by sector environmental analysis of 42 sectors on the Kings River, the State and Fresno County designated 37 sectors on the Kings River as MRZ-2 zones of regional significance. (SMAJtA EIR No. 8, Designation of Regionally Significant Construction Aggregate Resources in the Fresno-Production- Consumption Region, DEIR, 1987, FEIR 1988 Such designation;

"... requires that a lead agency's land use decisions involving designated areas be made in accordance with its mineral resource management policies, and that they consider the importance of the mineral resource to region or the state as a whole and not just the lead agency's jurisdiction. " (Section IIIA, 2 para.)

The Designation Report points out that:

"In total, aggregate as a basic construction material has important economic multiplier affects. The availability of aggregate is essential, for example to the construction industry. Developers, building and highway contractors, cement manufactures, asphalt producers, construction workers and truck drivers are dependent, directly or indirectly, on a ready supply of aggregate. Therefore the availability of aggregate deposits and their proximity to markets are critical factors in the strength of the economy. " (Section 1113)

In 1988, the County reinforced its Regional Plan and its commitment to encourage the development of mineral resources on the Kings River, while clearly recognizing that nearby residents may experience inconveniences. It amended its subdivision and parcel map ordinances (sections 17.04. 110 and 17.72.075 respectively) to require the following notices be filed with the Fresno County Recorder for all subdivisions and parcel maps within one-quarter mile of an area defined as MRZ-2 on the General Plan:

**"FRESNO COUNTY
MINERAL RESOURCE ZONE 2 NOTICE**

"It is the declared policy of the County of Fresno to preserve, protect and encourage development of its mineral resources for the economic well being of the County and its region. Residents of property in or near areas identified as MRZ-2 may experience inconveniences and discomfort associated with the operations involved in the extraction of mineral resources. This subdivision of land is located within or near an area which is currently developed or may in the future be developed for the purpose of extracting mineral resources."

Fresno County's Mineral Resource policies are based on the importance of its aggregate resources to the region as a whole. This importance is underscored by the following: With the imminent depletion of the resources from the San Joaquin River, the Kings River is the only other source of affordable aggregate construction materials in the Fresno region. There is only one major producer, CalMat, on the Kings River. CalMat does not have the current production capacity to make up the imminent production deficit from the San Joaquin River.

Aggregate producers on the San Joaquin River have created almost a thousand acres of wetlands and wildlife habitat through the reclamation of their mining sites. Two of the operators, CalMat and CMI, were featured in the California Department of Conservation's bimonthly publication California Geology-(March-April 1996) where the operators were recognized statewide for exemplary and successful reclamation to waterfowl habitat. An environmental balance has developed in the transition from mining to reclamation, as wildlife flourish in the reclaimed wetlands and riparian habitat created by aggregate mining. Some of Fresno's finest homes have been built overlooking the San Joaquin River aggregate operations during the past 35 years. Views have been enhanced and property values increased by the presence of reclaimed lakes and wildlife habitat.

Consistent with the San Joaquin River Parkway goals over 800 acres of these reclaimed wetlands have become the first units of the San Joaquin River Ecological Reserve and a major part of the San Joaquin River Parkway. Over 500 more acres of reclaimed lakes and wildlife habitat are being considered for additions to the Parkway.

The Parkway is now a major economic resource for Fresno County attracting businesses looking to relocate close to such an amenity and attracting tourism and recreational dollars. Aggregate producers have also generously supported the Parkway with donations, discounted materials and made their sites available for environmental education. This successful concept can be recreated on the Kings River.

On June 17, 1998 the Fresno Chamber of Commerce endorsed the retention of the current General Plan policies to preserve, protect and encourage development of its mineral resources for the economic well-being of the County and its region. On July 22, 1998 the Economic Development Corporation endorsed the following:

"The Fresno General Plan Update should retain policies from the existing General Plan to preserve, protect and encourage development of its mineral resources for the

economic well-being of the County and its region. The availability of affordable construction material deposits and their proximity to market are critical factors in the strength of the economy. Areas identified as having known or potential mineral resources, including those classified as Mineral Resource Zone 2 (MRZ-2) along the Kings River, should be reserved as potential sites for future resource recovery.

The current and historic policies of Fresno County and the State as outlined above clearly indicate that mining and processing operations within the Kings River MIZZ-2 areas are not only appropriate, but should continue to be among the primary designated uses for the area. Obstructions to recovery of this valuable resource would create significant, negative economic impacts to the regional economy and the construction industry

Alternatives:

After the San Joaquin River, the Kings River aggregate deposits are the closest source of affordable construction materials to the Fresno region. Fresno County has planned for the conservation and recovery of aggregate resources from the Kings River for over 30 years. It is imperative that the potential to recover aggregate resources from the Kings River is preserved. The loss of such potential would create a significant economic impact to the Fresno region and to agriculture. The next closest aggregate source is 60 miles away in Coalinga. Prohibiting the recovery of the designated resources on the Kings River and hauling from Coalinga will have significant economic and environmental costs including; direct, indirect and induced economic adverse impacts by reducing current jobs, the loss of future jobs, loss of income and loss of tax revenue while increasing environmental and economic costs from increased vehicle miles traveled, more air emissions, increased road maintenance and greater exposure to traffic accidents. The increase in transportation costs alone (\$50 million/year) will cause the price of aggregate in the Fresno P-C Region to more than double. (Update of Mineral Land Classification: Aggregate Materials in the Fresno-Production-Consumption Region, Department of Conservation, Division of Mines and Geology 1999.)

Thank you for the opportunity to comment on the scope of the EIR for the Fresno County General Plan Update. We look forward to participating in this important effort.

Sincerely,


John E. Buada
Chairman