

## PER CAPITA AGGREGATE CONSUMPTION

A per capita consumption model developed by the California State Department of Conservation was used in the Syar EIR as the basis to calculate the tonnage of aggregate Napa County consumes annually. The value cited in the EIR is 8.8 tons/person/year. This value was developed from regional data to develop a regional average to project aggregate demand for large metropolitan areas. This regional average was not intended to be a substitute for local, empirical data specific to Napa County.

To quote the State's Report, "The per capita consumption model has proved to be effective for projecting aggregate demand in major metropolitan areas." ... "However, the per capita model may not work well in county aggregate studies..."

This per capita value of 8.8 tons is an average figure. An average is the mid-point between high and low extremes. Napa County is largely agricultural with no major metropolitan population, its annual consumption is of the lower extreme and, therefore, the 8.8 tons/person/year value used in the Syar EIR misrepresents and overstates Napa County's actual yearly aggregate consumption.

This is a foundational error in the Syar EIR. The empirical data needed to accurately calculate Napa County's actual yearly aggregate need is available but has not been collected. Until this information has been collected and made available to the public and decision makers, meaningful, analytical review of the Project's proposals, impacts, and mitigations is not possible in violation of CEQA. Until this empirical data is collected and made available, informed and reasoned decision-making relative to the proposed Quarry expansion and permit extension is not possible.

Also, to clear up a widespread misconception repeated by the applicant, the Napa Valley Register, the County and some members of the public: The Quarry does not have land use priority. Napa State Hospital's land use designation is precedent, it came first, and the various quarrying permutations including Syar Napa Quarry came later. The State Hospital construction began in 1870 and was completed in 1875. It has been a large community development in continuous operation ever since.

Basalt's mechanized quarry operation did not begin until 1923, 48 years later, and has, to this day, continued to encroach on the State Hospital's land use designation and the area now known as Skyline Park. Because the Syar open-pit surface mining operation creates large quantities of toxic emissions, extraordinary controls must be put in place to stop this pollution in order to protect Napa's settled residential population, schools, businesses, and Skyline Wilderness Park. Please make this important distinction: **A permit issued to operate is not permission granted to pollute.**

Two State Documents were referred to in this PC Presentation:

1. North San Francisco Bay P-C Region, SR 146, Part III.
2. California Geological Survey, Department of Conservation, Special Report 205, 2013. *Update of Mineral Land Classification: Aggregate Materials in the North San Francisco Bay Production-Consumption Region, Sonoma, Napa, Marin, and Southwestern Solano Counties, California.*