



October 31, 2013

To: State Mining and Geology Board

RE: November 14, 2013 Meeting Agenda Items X-6 and X-7

X-6. Discussion of Regional or Statewide Significance in Regards to Proposed Regulatory Language for Designation of Mineral Lands within the San Luis Obispo-Santa Barbara Production-Consumption Region, California.

X-7. Approval of Proposed Regulatory Language for Designation of Mineral Lands within the San Luis Obispo-Santa Barbara Production-Consumption Region, California.

Margarita Proud is a community organization dedicated to the future livability, rural quality, and safety in and around Santa Margarita, Ca. Our organization may or may not have specific concerns regarding the Designation of Sector C within the San Luis Obispo-Santa Barbara Production-Consumption Region to be of “State-wide” versus “Regional” significance. Without a staff report, minutes clearly summarizing the events of the September 12, 2013 SMGB meeting that led to consideration of this unusual request, or a detailed follow-up to the preliminary responses provided on October 4, 2013 to questions submitted on September 13, 2013 by one of our members, not enough detail exists to make more than general comments on the process at large.

Your board is specifically asking comments to be submitted fifteen (15) day prior to the November 14, 2013 meeting, yet sufficient information to provide meaningfully informed comments has not been provided. We specifically request that this correspondence be included in the public record and that our future comments be included when sufficient information is provided to the public.

General Process Comments

Our introduction to the Classification-Designation process originated with a proposal for an extractive operation by Las Pilitas Resources LLC within this sector. Our level of interest was a direct result of a project applicant consistently mis-representing the meaning and intent of the Classification-Designation process to our community. Your Board should be aware of, and take into consideration, the inconsistency that this specific project ultimately has with Designation of either level of significance. Presently, Las Pilitas Resources LLC, and the Draft Environmental Impact Report (DEIR) state that production of Portland Cement Concrete grade aggregate will **NOT** occur. This is curious, as the fundamental purpose of Special Report (SR)-215 and the Designation process appears to be the preservation and sustainability of concrete grade aggregate, which SR-215 declares is “among the scarcest and most valuable construction aggregate resources”.

There does not appear to be any previous examples of designation where aggregate has been deemed to be of statewide significance on the order of boron compounds or other rare earth minerals. Doing so would seem a rather anomalous action for your board to take. Additionally, such an unprecedented action would open the entire designation process, past and future, up to comments and questions pertaining to new information not yet considered.

Margarita Proud’s initial interest in the Designation process concerning Sector C, the La Panza Granitic Area, was in trying to preserve current entitlements of property owners to develop their parcels without the additional burdens that would be imposed by the County of San Luis Obispo after Designation is enacted. The attached letter was submitted to the County of San Luis Obispo. Our input, as outlined in the letter, does not appear to have been forwarded to SMGB by the county of San Luis Obispo as part of their requests for modification of areas to be designated. Your board’s consideration of this information is greatly appreciated.

Thank you in advance for your dedication to maintaining the integrity, truth, and transparency of an important process.

Sincerely,

A handwritten signature in black ink that reads "Roy Reeves". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Roy Reeves, President