



To: MTC Public Information  
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Attn: Draft EIR Comments

From: Pat Mapelli - Land Use Manager

Date: June 22, 2021

Subject: Draft EIR Comments – Plan Bay Area 2050

Thank you for providing us the opportunity to review and comment on this draft document. There has obviously been a lot of work to produce such a significant, regional document that takes a thirty year look ahead.

In order to put some context to my comments, I want to provide you with some background information about Graniterock. Graniterock is a 121-year-old company founded in 1900 around the A.R. Wilson Quarry located in Aromas, California. Graniterock's core businesses are supplying construction materials (aggregate, asphalt and concrete) as well as being a Heavy Civil Contractor – License #22 (the second oldest in the State of California). The A.R. Wilson Quarry was originally used as a source of ballast rock for the Southern Pacific Railroad as the region began to develop in the late 1800's. The mainline rail track that was constructed runs immediately adjacent to the A.R. Wilson Quarry and Graniterock has invested significantly in a rail distribution system in order to transport our aggregate into the Bay Area region. As Graniterock has grown, we have invested in industrial properties in the San Francisco Bay Area located adjacent to the mainline track in order to take advantage of our ability to transport aggregate by rail. Today, Graniterock owns and operates two facilities in San Jose, one facility in Redwood City and one facility in South San Francisco. Each one of these facilities has the ability to produce either concrete and/or asphalt using the aggregate from the A.R. Wilson Quarry. These products are essential to support the maintenance of our existing infrastructure and the future growth of our region.

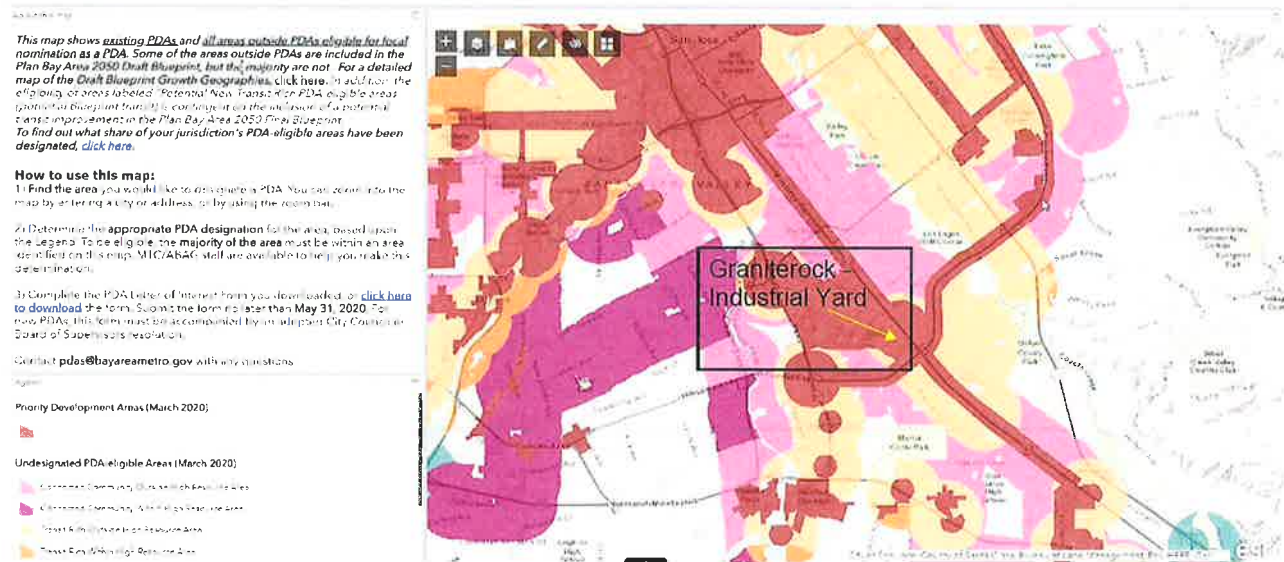
As the Bay Area has evolved over the past decades, blue-collar and manufacturing jobs (middle-wage) have diminished. This is acknowledged in *Section 2.2.2 – Proposed Plan Strategies – Improve Economic Mobility* – “*As these types of jobs available to Bay Area residents continue to shift, fewer and fewer middle-wage jobs become available. Over the past few decades, the traditional path to middle class through a blue-collar industry like manufacturing has become ever more elusive as automation grows and wages sharply diverge. A stronger safety net, coupled with a concerted effort to open more pathways to middle wage jobs, is critical to ensuring that no one is priced out of the Bay Area.*” This is also reinforced by Plan strategy



**EC06. Retain and Invest in key Industrial Lands - \$4 Billion – “Implement local land use policies to protect key industrial lands identified as PPAs, while funding key infrastructure improvements in these areas.** Key industrial lands do need to be protected throughout our region, but the Plan fails to identify all key industrial lands as PPA’s.

For example, Graniterock owns and operates an industrial yard located immediately adjacent to the UPRR mainline track in south San Jose near Communications Hill located at 120 Granite Rock Way – referred to as our Capitol Yard. Graniterock acquired this site in the early 1970’s, which was formerly owned by the San Jose Brick Company. This site has been in industrial use for more than 130 years and is an important, strategic location for Graniterock’s businesses. Aggregate is loaded into rail cars at the A.R. Wilson Quarry in Aromas, CA and is brought up to our four facilities, including our Capitol Yard. We have produced an EIR to modernize this industrial facility in order to be more efficient and better serve our customers as well as maximize the use of the rail delivery system. Upon review of the Plan and the accompanying maps, I noticed that the area where Graniterock’s Capitol Yard is located is shown as a PDA rather than a PPA. This is in direct conflict with the City of San Jose’s General Plan, the historic use, our current use and our future use of this site. It has been and will continue to be an industrial facility. See below for your reference.

Spring 2020 Priority Development Area (PDA) Letter of Interest Guide Map (updated April 2020, The purpose of this map is to guide local jurisdictions interested in nominating new PDAs or modifying the boundaries of an existing PDA.

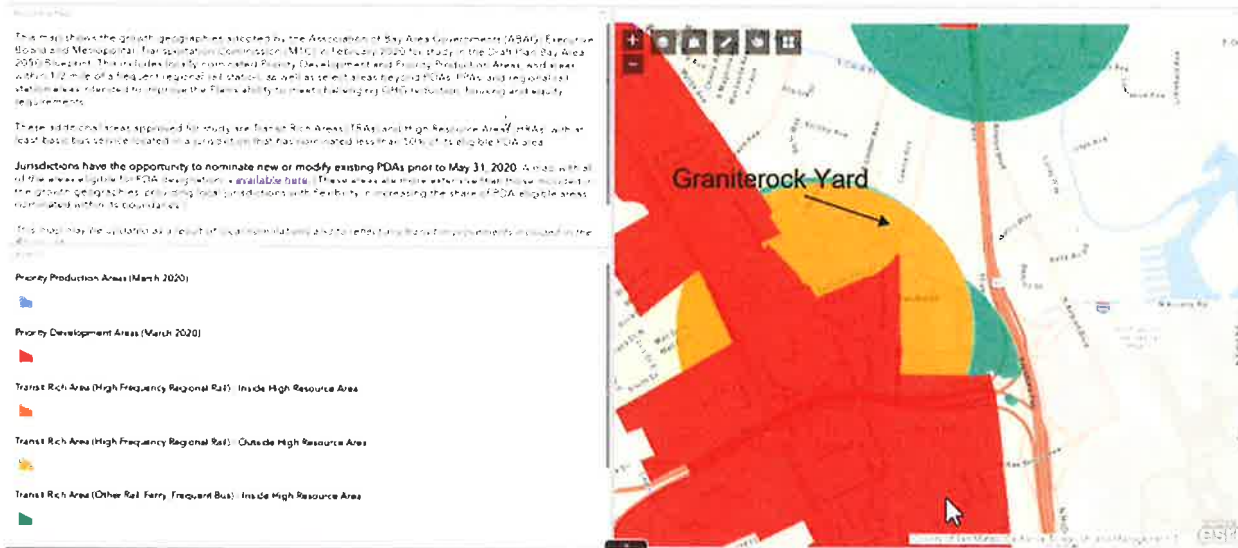


Similarly, Graniterock’s South San Francisco yard is located adjacent to the UPRR tracks where aggregate is transported by rail from the A.R. Wilson Quarry to this location for the production of construction materials. The City of South San Francisco is entering the final stretch of updating their General Plan and is continuing to show this area as industrial, which is the preferred alternative. Draft Plan Bay Area 2050 shows Graniterock’s industrial facility as being located in a Transit Rich Area and a significant portion of the surrounding area as being within a



PDA. This is inconsistent with the City’s General Plan Update path and is in conflict with Graniterock’s use. See below for your reference.

**Plan Bay Area 2050: DRAFT Blueprint Growth Geographies for Study**  
Adopted by ABAG Executive Board and MTC Commission, February 2020, for study in Draft Plan Bay Area 2050



Although the Draft Plan Bay Area 2050 EIR acknowledges that MTC and ABAG do not have land use authority, it is widely known that this document will influence land use decisions by the cities with potential for being incorporated into General Plan Updates – usually with the driving factor being access to transportation funding. This situation puts undue pressure on long standing businesses like Graniterock, who have worked for decades to locate their businesses in strategic locations in order to serve the market.

As populations continue to grow, both in housing and jobs (1.5 million new housing units and 1.4 million new jobs over the next 30 years), where will the construction materials come from if plans like this drive the construction materials market out of the area? This would lead to higher costs for construction, construction materials, all with the affects of generating higher GHGs – none of which was studied in any detail.

The Draft Plan acknowledges in *Section 3.11.4 – Impact Analysis – Impact LU-1*: that **“The proposed Plan was designed to accommodate the people, households, and jobs identified in the regional growth forecast.”** The disconnect is that this Draft Plan fails to acknowledge industrial jobs as being identified in the regional growth forecast; otherwise, some of the geographic studies would have incorporated those uses in the Plan. In fact, *Impact LU-2* acknowledges that this Plan will **“cause a significant environmental impact due to a conflict with any land use plan...”**



In summary, Graniterock's properties will continue to be used for industrial purposes into the foreseeable future and should be shown as such, consistent with each city's General Plans. To show them otherwise will compromise our future use and business growth. Should you have any questions or desire to discuss, please do not hesitate to contact me at (510) 386-0538 or alternatively by email at [pmapelli@graniterock.com](mailto:pmapelli@graniterock.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Mapelli".

Pat Mapelli, Land Use Manager  
Graniterock  
5225 Hellyer Avenue, Suite 220  
San Jose, CA 95138

cc: Kevin Jeffery, EVP General Counsel