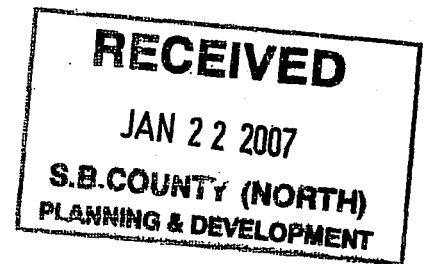




**Santa Barbara County
Air Pollution Control District**

January 17, 2007

Gary Kaiser, Planner III
Santa Barbara County Planning & Development Department
624 West Foster Road, Suite C
Santa Maria, CA 93455



RE: Diamond Rock Sand and Gravel Mine and Processing Facility: Revised Draft EIR

Dear Gary,

The Santa Barbara County Air Pollution Control District (APCD) has reviewed the revised Draft EIR for the above mentioned project. In general, we concur with the conclusions in the DEIR regarding the significance of the air quality impacts of the project. However, the APCD had to contact the consultant separately to determine the assumptions that were used in the Health Risk Assessment model. The DEIR is a public disclosure document. Please ensure that all information regarding the air quality analyses are documented clearly in the Final EIR and the Appendix.

SPECIFIC COMMENTS

1. The APCD provides the following examples of information that was not documented in the DEIR and which should be included in the FEIR:
 - Page 3.7-9, Table 3.7-6. Please provide emission calculations for both the on-site mining equipment and the haul trucks.
 - Please provide documentation of which sources are included within each source group used in ISC modeling. For example, there are 12 modeled sources. Which pieces of mobile equipment are included in these 12 sources? What source or sources are considered a point source (source 12)? A sample calculation of emissions for each group would be beneficial.
 - Table 3.7-19 shows that diesel particulate emissions from off-highway mobile equipment are estimated to be 1.3 tons per year or 2,600 pounds per year from mining equipment and on-site haul trucks (the assumption is that these emissions are from combustion alone). The total diesel particulate emissions used in the dispersion modeling, (not including the haul trucks), however, are shown to be approximately 120 pounds per year. Please provide an explanation for this discrepancy. Additionally, please describe how the haul truck diesel particulate emissions were calculated and how

they were handled in the health risk assessment modeling (how the haul truck emissions were apportioned in the modeling).

2. The DEIR does not include a Mitigation and Monitoring Plan for review. We are not clear how the deferred air quality mitigations and conditions will be tracked and enforced by Planning and Development Department after the land use clearance has been issued. Specifically, how will the requirement for a revised health risk assessment and additional mitigations be enforced after P&D no longer has permit authority over the proposed project?

Please contact me at 961-8893 or by e-mail at vlj@sbcapcd.org if you have questions.

Sincerely,



Vijaya Jammalamadaka, AICP
Air Quality Specialist
Technology and Environmental Review Division

cc: Joe Petrini, APCD
Project File (Diamond Rock Mine)
TEA Chron File

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