

**VENTURA COUNTY**  
**AIR POLLUTION CONTROL DISTRICT**  
Memorandum

TO: Chuck Anthony, Planning

DATE: January 30, 2007

FROM: Alicia Stratton *AS*

SUBJECT: Request for Review of Revised Draft Environmental Impact Report for the Proposed Diamond Rock Sand and Gravel Mine and Processing Facility, Troesh Ready-Mix, Santa Barbara County (Reference No. 05-007-1)

Ventura County Air Pollution Control District staff has reviewed the subject revised draft environmental impact report (DEIR), which is a proposal to develop a new sand and gravel mine and processing facility on a 133-acre site located in the Cuyama River channel and on the adjoining river terrace, respectively. The project would extract sand and gravel aggregate from the Cuyama River over a 30-year period and process the material on the adjoining river terrace. The mine would produce approximately 13,820,000 tons of material at an average annual production rate of 500,000 tons per year and a peak production rate of 750,000 tons per year. The material would be trucked to job sites based on demand and the project would also be a receiver site for recyclable concrete. The project is located on the west side of State Highway 33, 5.9 miles south of its junction with State Highway 166 in the unincorporated Ventucopa area of Santa Barbara County.

We wish to submit the following comments on the DEIR:

Project Trip Generation

1. Page 3.5-14 states that the increase in vehicular and truck traffic along Highway 33 south of the project site would be minor if mine production were dispersed, but substantial if all mine production were hauled to Ventura (22 to 34 percent increase in vehicular truck traffic). The DEIR contains long-term projections of percentages of mining traffic traveling south through Ventura County ranging from 20 percent (Page 3.5-6) to 22-34 percent (Table 3.5-15) to 90 percent if distribution of material is mostly southbound on Highway 33 (Table 3.5-5). Please clarify the scenario of product demand requiring mostly southbound travel through Ventura County and its likelihood of happening on a regular basis.
2. Section 3.7.2.3.7 evaluates Impact Significance in Ventura County. We recommend this section be revised to accurately state trip distances, trip percentages and air quality impacts through the Ojai Planning Area in Ventura County. The second paragraph on

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Page 3.7-8 states that the total haul route distance from the project site to Highway 101 in central Ventura is 65 miles, however, it erroneously states that only eight miles of this route occurs in the Ojai Planning Area. The actual distance is 15.9 miles one-way, and could alter the findings of the DEIR with respect to air quality. Further, the reader is directed to Tables 3-62 and 3-63 on (Page 3.7-17 and Page 3.7-18) to review the conclusion that the emissions from the average and peak daily truck traffic in the Ojai Planning Area would be less than significant. Tables 3.6-2 and 3.6-3, however, present truck loading scheduling and estimated sound pressures from mining activities (No Tables 3-62 and 3-63 could be found in the DEIR). Please provide specific pages where the aforementioned air emissions tables can be found.

3. There is a deficiency in Table 3.7-16, *Daily Emissions During Peak Annual Production Year*, on Page 3.7-15. The table states that truck emissions in the Ojai Planning Area would be 2.11 lbs/day NO<sub>x</sub>, based on 600 tons per hour processing rate and hauling based on peak annual production year. Appendix B, however, states that on an average day, the Ojai Planning Area would receive 4.6 lbs/day NO<sub>x</sub> from project haul trucks. CEQA requires analysis of worst-case scenarios and this analysis fails to document impacts on the Ojai Planning Area on a maximum or peak haul day.

We believe these estimates should be recalculated to accurately portray potential air impacts on a peak production day from that the portion of the haul trucks traveling through the Ojai Planning Area.

$$15.9 \text{ miles} \times 2 \text{ (round trips)} = 31.8 \text{ miles/vehicle} \times 0.010318 \text{ lbs/NO}_x\text{/mile} \\ \times 138 \text{ vehicles (69 exit loads on a peak day)} = 45.27 \text{ lbs/day NO}_x.$$

This amount of NO<sub>x</sub> exceeds Ventura County's CEQA threshold of five lbs/day for projects in the Ojai Planning Area.

4. Table 3.7-8 states that the Ventura County trucking destination would receive 18.4 round trips (1,136 vehicle miles traveled) in Ventura County on an average production day, and Table 3.7-9 cites 27.6 round trips (1,704 vehicle miles) traveled per day in Ventura County during a peak production day. Subsequent emissions estimates for Ventura County from this scenario are 11.7 lbs/day NO<sub>x</sub> in Ventura County in an average production year (Table 3.7-10), and 17.6 lbs/day NO<sub>x</sub> in Ventura County in a peak production year (Table 3.7-11). Further, Table 3.7-15, *Daily Emissions During an Average Production Year*, cites total Ventura County truck NO<sub>x</sub> emissions of 11.7 lbs/day NO<sub>x</sub> and 1.4 lbs/day NO<sub>x</sub> in the Ojai Planning Area. Daily emissions during peak annual production in the Ojai Planning Area are listed at 2.11 lbs/day NO<sub>x</sub>. The final table in the June 12, 2003 Air Quality Impact Assessment, however, presents an estimate of 17.8 lbs/day NO<sub>x</sub> in Ventura County, and 4.6 lbs/day NO<sub>x</sub> in the Ojai Planning Area on an average production day. We recommend the entire DEIR be revised to obtain consistency between the chapters and appendices.

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### Health Risk Analysis

5. Section 3.7.2.4 addresses potential impacts from diesel emissions. This discussion states that the proposed project would introduce new diesel emissions along State Route 33 in Ventura County. We note that a health risk assessment was conducted to estimate the effects of diesel exhaust from truck traffic to and from the project. The results from the health risk assessment are in the DEIR, with the statement that the results were based on West Coast Environmental and Engineering documents, dated May 15 and September 6, 2006. The results of this analysis indicate that the increase in cancer risk would be approximately 9 in one million at the point of maximum offsite exposure. Because the DEIR states that only 20 percent of the trucks will travel through Ojai, District staff assumes that this conclusion of insignificant excess cancer risk insignificance is based on an average day, not a peak production day.

Analysis of the project's 138 maximum truck trips per day using California Air Resources Board's risk assessment for generic scenarios involving diesel particulate matter emissions (using diesel truck travel on a low volume freeway) shows a calculated lifetime excess cancer risk of 100-200 in a million for 2,000 trucks per day for a receptor located 20 meters from the freeway. Factoring down from 2,000 to 138 trucks per day gives a risk of 7-14 in a million. Again, factoring down from 138 trucks per day to 20 percent of that, 28 trucks per day, yields a 1-3 in a million risk. However, CEQA requires analysis of worst-case scenarios and this analysis fails to document potential air toxics impacts on sensitive receptors along the haul route in the Ojai Planning Area on a peak haul day. With the local air districts' significance threshold of 10 in a million, we recommend that the health risk assessment be revised to evaluate peak truck trips through Ventura County and the Ojai Planning Area portion.

6. We recommend that the health risk analysis evaluates potential health risks to the sensitive receptors along Highway 33 in and around the City of Ojai. These include several preschools, several elementary schools, a high school, a nursing home, and a hospital. It is not clear if the DEIR's health risk analysis evaluated these sensitive receptors for potential impacts.

### Cumulative Impacts

Section 6.2 of the DEIR discusses cumulative impacts from truck traffic from other mines in the region. This discussion, *Cumulative Impacts with Truck Traffic From Other Mines in the Region*, states that there are two other existing mines in the Cuyama Valley that contribute truck traffic to State Highway 33. The discussion concludes that the potential cumulative impacts on the quality of life in the area are considered adverse and unavoidable (stated that this is due in part to NOx and fugitive dust emissions from highway haul trucks that contribute to the degradation of regional air quality). Despite this conclusion, we

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recommend that this discussion be revised to evaluate and document existing and potential future truck traffic and incremental air quality effects from the proposed project in conjunction with the Mosler Rock Quarry north of Ojai, and Pacific Custom Materials/TXI Mine in northern Ventura County, in addition to the other mines already included in the cumulative impact analysis in the DEIR. The cumulative impact analysis should include project-specific information on NOx and diesel particulate emissions in a table format showing current and cumulative impacts and their effects on sensitive receptors.

If you have any questions, please call me at (805) 645-1426 or email me at [alicia@vcapcd.org](mailto:alicia@vcapcd.org).

cc: Steve Bennett, Supervisor First District, Ventura County  
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