

MEMORANDUM  
VENTURA COUNTY PLANNING DIVISION

January 29, 2007

TO: CHUCK ANTHONY, PLANNING DIVISION

FROM: PAT RICHARDS, MANAGER, C AND I SECTION



SUBJECT: COMMENTS TO DIAMOND ROCK EIR, SCH 2003121049

Scott Ellison of my staff has reviewed the subject document on behalf of the Ventura County Planning Division and we have the following comments:

**Required Mitigation Measure TR-1:**

We recommend that Mitigation Measure TR-1 be revised as follows in order to reduce traffic congestion impacts through the Ojai Valley consistent with the Ventura County CEQA Initial Study Guidelines:

Truck operations that utilize State Route 33 between Casitas Springs and the City of Ojai shall be prohibited as follows:

- a. Southbound traffic on weekdays between 6:30 am and 9:00 am.
- b. Northbound traffic on weekdays between 3:30 pm and 6:30 pm.

The above is consistent with Ventura County General Plan Policy 4.2.2-7 (mitigation of impacts on congested roads) and with the Ventura County Initial Study Guidelines on this issue.

**Suggested Mitigation Measure TR-3:**

1. For the Nordhoff High School limitations we suggest the following:
  - a. The mitigation measure lists the times of the Nordhoff High School limitations as corresponding to "lunch and afternoon breaks". However, based on the school schedule, the times refer to morning arrival and afternoon departure times.
  - b. The term "school year" could be changed to "days Nordhoff High School is in session" to more accurately reflect the school district request.
2. In order to address potential safety conflicts with school district buses as identified by the Cuyama Joint Unified School District and El Tejon Unified School District, we suggest the following additional mitigation measure:

Prior to start of operations the permittee shall schedule truck traffic arriving and leaving the project site such that said traffic shall not significantly interfere with the Cuyama Joint Unified School District or El Tejon Unified School District bus schedules on the days the busses are operating. In order to implement this mitigation measure, one of the following two options shall occur. Option 2 shall only be implemented if agreement between one or both of the school districts and the permittee cannot be first reached as discussed in Option 1.

Option 1 -- The permittee shall provide the Planning Director with written documentation from the two districts that confirms that the truck scheduling will not interfere with either school bus schedule.

Option 2 -- If agreement on Option 1 cannot be reached, the Planning Director shall specify what limitations if any, shall be imposed in order to avoid interference with school busses. In addition, the following shall be implemented in order to educate the truck drivers:

Every six months the permittee shall submit to the Planning Director signed statements from all drivers who drive trucks for customers with standing accounts that they have reviewed: (1) a statement of caution approved by the school districts; and (2) a map showing the locations of bus stops on SR-33, SR-166 and Lockwood Valley Road for the two school districts. Signed statements shall be due by June 30 and January 31 of each year.

Regardless of which option is implemented, the following shall also occur prior to start of operations:

- 1) Retain current school bus schedules at the project site.
- 2) Post a sign of a size and wording approved by the Planning Director as trucks leave the site reminding them to be particularly careful at school bus stops.
3. While we support the concept of the truck identification program outlined in Mitigation Measure TR-3, we recommend that it be extended to all companies and their trucks for which the project has a standing commercial account. This would avoid the occasional small customer which is not a significant concern, but would still include the larger fleet operators with the larger trucks which are of concern to local residents. We are proposing the same mitigation measure for Ozena Valley Mine. This mitigation measure should read as follows:

Product trucks traveling to, or leaving from, the site shall use easily

identified placards, or other method acceptable to the County of Santa Barbara County and the County of Ventura, that allow easy determination of what mine the truck is utilizing. This identification system only applies to trucks being used by customers with accounts on file with the project.

The purpose of this condition is to develop a unified vehicle identification program for mining projects in Santa Barbara and Ventura Counties that allows designated condition compliance monitors or members of the public to easily identify the mine the truck is utilizing. Such identification will help to monitor condition limits on numbers of truck-trips, designated routes, and/or permitted hours of operation for many of the mines in the two counties.

Applying an identification system only to the mine fleet trucks will greatly reduce its effectiveness. We are proposing the above measure for the Ozena Valley Mine; however, because it has no fleet trucks of its own, the current mitigation measure in the Diamond Rock EIR would be ineffective if applied to Ozena.

#### **Noise Impacts Along State Route 33:**

In order to address quality of life impacts due to noise experienced by residents on State Route 33 through the Ojai Valley the following mitigation measure is proposed:

Truck traffic shall not travel on State Route 33 between Casitas Springs and the City of Ojai between 10 pm and 9 am except to support night operations of a public works project. When such operations are planned, the permittee shall notify the Planning Departments of the County of Santa Barbara, County of Ventura, and City of Ojai in writing (e-mail is acceptable) at least 24 hours beforehand.

#### **Unified Monitoring Program:**

In order to assist in avoiding project specific and cumulative environmental impacts, we recommend that this project participate in a unified monitoring program which would include other mines in both Santa Barbara and Ventura Counties that generate relatively large volumes on traffic on State Route 33. We recommend such a program as part of the Cortese Monitoring Program for this project; the program should only take effect when at least one project in Ventura County is also subject to its terms. For instance, we are recommending this mitigation measure for the Ozena Valley Mine. The recommended monitoring program is as follows:

The permittee shall participate in a permit monitoring program if developed by the County Ventura and the County of Santa Barbara to uniformly monitor condition compliance for this permit as well as other relevant permits in both counties (i.e. mines generating significant amounts of traffic using SR-33 and/or SR-166). This program may include, but is not limited to, some or all of the following elements:

- a. Traffic monitoring devices (counter hoses, etc) at or near the project entrance that record the timing and/or identification of trucks arriving and departing the project.
- b. Use of public employees or consultants hired by the count(ies) to monitor and record truck movements in Ventura, Santa Barbara, Kern and/or San Luis Obispo Counties.
- c. Immediate review of project weigh tickets as requested by public employees or authorized consultants. Toward this end, the permittee shall keep at least the previous 365 days weigh tickets on file at the project at all times.

The cost of this program, including any consultant or County staff costs, shall be borne by the participating projects based on their pro rata share of the total mining traffic (i.e. previously permitted trips and any additional trips approved by this or future modifications to this permit) generated by the participating projects.

Questions regarding these comments may be addressed to Scott Ellison of the Ventura County Planning Division at (805) 654-2495 or e-mail [scott.ellison@ventura.org](mailto:scott.ellison@ventura.org).

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PUBLIC WORKS AGENCY  
TRANSPORTATION DEPARTMENT  
Traffic, Advance Planning & Permits Division  
MEMORANDUM

DATE: January 19, 2007

TO: Resource Management Agency, Planning Division  
Attention: Chuck Anthony

FROM: Nazir Lalani, Deputy Director *NL*

SUBJECT: Review of Document 05-007-1 – DEIR Diamond Rock Sand and Gravel Mining and Processing Facility, in Santa Barbara County.  
Applicant: Diamond Rock Sand and Gravel  
Lead Agency – **Santa Barbara County.**

The Public Works Agency -- Transportation Department has reviewed the DEIR for above project. The project proposes to construct new sand and gravel mining and processing facility in and along the Cuyama River. The subject site is 132.64 acres located immediately west of State Route (SR) 33, approximately six miles south from its junction with SR 166 in the County of Santa Barbara.

Figure 3-26 of the DEIR indicates that for southbound delivery scenario, the project will generate 151 ADT on SR 33 south of SR 150. The DEIR indicated this project may have an adverse impact on SR 33 in the Casitas Springs area unless mitigated. Our comments are as follows:

1. Mitigation measure TR-1 listed in Section 3.5.3 for restricting peak-hour trips shall take into consideration the travel time needed for the truck trips to travel from/to the project site to/from the SR 33 impact area, which is between the northerly end of Ojai Freeway and the City of Ojai.
2. The suggested Condition TR-3 to increase truck safety along State Routes 33 should be included as a required mitigation measure for this project.
3. The amount of truck trips generated by this project will reduce the life expectancy of the pavement on SR 33. This will make the need for pavement resurfacing and rehabilitation improvements to occur much sooner than normally scheduled.

If Caltrans develops a road maintenance fee district during the life of this permit, the permittee shall participate in said district or an equivalent program as may be approved by the Planning Director. The permittee shall be required to pay towards the maintenance of SR 33 between SR 166 and SR 150.

In the event the County of Ventura proceeds with the establishment of a road maintenance district or other such entity designed to fund road maintenance, which includes the project area during the life of the project, the permittee shall not oppose the development of such district or other entity.

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