



Sierra Club

Los Padres Chapter

Santa Barbara and Ventura Counties

Arguello Group

Conejo Group

Santa Barbara Group

Sespe Group

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January 31, 2007

Gary Kaiser
Santa Barbara County Planning Department
624 West Foster Road
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RE: DIAMOND ROCK SAND AND GRAVEL MINE REVISED DRAFT EIR

Dear Mr. Kaiser:

The Revised Draft EIR, (RDEIR) for the Diamond rock Gravel Mine is inadequate in several areas including its assessment of impacts related to biological resources, air quality, water quality, traffic, noise, aesthetics, regional planning, growth inducing impacts and cumulative impacts. Where mitigations are listed they are largely inadequate to remedy the impacts identified. Therefore, it is necessary to revise and recirculate this document again if the proponents wish to pursue permits for this project. As the document is now constructed, Santa Barbara County must deny certification of the RDEIR.

BIOLOGICAL RESOURCES

The project location along with the identified route for truck traffic is surrounded by wilderness area and other sensitive areas of the Los Padres National Forest. The RDEIR fails to list all of the sensitive species that could be expected to be found in this area of the national forest. The document also fails to identify impacts associated with each species or to identify mitigations to reduce the impacts of the project on wildlife.

AIR QUALITY

The RDEIR fails to disclose the true impact of truck traffic on the air quality of non-attainment areas within Ventura County. Many questions remain regarding the true number of trucks on given days and the total numbers of NOX and other chemicals discharged into the air.

A secondary issue results from the cumulative impacts related to other sources with permits and other sources seeking new permits including the demolition of the Matilija Dam.

WATER QUALITY

Water quality may be severely impacted due to the migration of diesel fuel and other petrochemicals into the area watersheds. The RDEIR fails to identify the source of pollutants and reasonable measures to reduce impacts or to mitigate for the damage done to water quality.

TRAFFIC

Truck traffic associated with this project will create a severe and adverse impact to normal uses of Highway 33. Certainly travelers of this route will be slowed and inconvenienced. But more important is the danger created by the additional slow moving vehicles on winding mountain highways. The RDEIR fails to consider the impacts directly created by this project and fails to consider the indirect impacts resulting from the total amount of new truck traffic on Highway 33.

SAFETY

Associated with the increase in large trucks carrying massive loads is the impact of their passage through urban areas with homes residents and businesses. Traffic problems already exist from the Ojai City limits down to Casitas Springs. The addition of these trucks into that mix will create hazards for motorists, pedestrians and cyclists.

Cyclists and pedestrians do use most of Highway 33. It should be considered that in many places there is no place for cyclists and pedestrians to go when vehicles pass each other on Highway 33. The addition of large trucks will make this situation much worse, creating a severe adverse impact.

NOISE

Much of the area adjacent to highway 33 is within Wilderness areas and along the Scenic River corridor. The absence of urban related noise is a significant part of the wilderness experience. Therefore the addition of any noise associated with diesel engines must be considered a severe adverse impact.

Campers even at a distance from the Highway will be likewise affected. The Club has many reports from members being unable to sleep while camping in the national Forest due to the noise from truck traffic.

AESTHETICS

The RDEIR doesn't give this subject serious consideration as required by CEQA. The project site itself has a severe adverse impact due to the urbanization of a mostly wild area. No adequate mitigations are listed for this impact.

The impacts from truck traffic along highway 33 creates even more severe adverse impacts to all of the National Forest area, especially the Wilderness areas, Scenic Highway and Scenic Rivers.

THE PROJECT IS GROWTH INDUCING

The intent of the project is to provide aggregate for construction purposes. Therefore the RDEIR must list all of the impacts associated with the project. It is significant that most of the impacts will fall on Ventura County even though permitting falls upon Santa Barbara County.

CUMULATIVE IMPACTS

The CEQA standard for determining which future projects to consider is to include all projects reasonably foreseeable in its assessment. Since the lead agency knows of several other mining projects close to the project all of the truck trips and other impacts must be added together. Impacts created from other large projects like the Matilija Dam project must also be included.

The total impacts created by the increased productivity of 4 mines is severe and adverse. The impacts associated with truck traffic for all of these projects are also severe and adverse.


CONCLUSION

Our Chapter cannot support Certification of this document because it is incomplete and inadequate and therefore in violation of CEQA.

INCORPORATION BY REFERENCE

The Sierra Club hereby incorporates by reference all comments made by all other commenter on this project.

Thank you for the opportunity to comment on this project.

Sincerely,

Alan Sanders

Alan Sanders
Conservation Chair
Sierra Club, Los Padres Chapter

TO:
Gary Kaiser
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624 West Foster Road
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FROM:
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Hi Gary,

I'm the Chair of the Executive Committee of the Los Padres Chapter of the Sierra Club. Our Chapter, which spans all of Santa Barbara and Ventura Counties, has thousands of members. First of all I want to know that the Executive Committee has passed a unanimous resolution condemning this project and any subsequent quarry projects that are planning to use Highway 33 to deliver gravel to Ventura. I understand that the (ironically-named) Diamond Rock Mine, which is actually a *gravel* mining company, has applied to the Santa Barbara County Planning Commission for a permit to mine gravel in the Cuyama Valley. I also understand that three other firms - GPS, Lima and Ozena - are waiting in the wings with similar proposals for similar gravel quarry projects. The number of trucks that these firms want to put on Highway 33 each day is staggering:

- Diamond Rock – 92 trips a day
- GPS – 55 trips a day
- Lima – 240 trips a day
- Ozena – 132 trips a day

What does that have to do with us down here in Ventura County? Pretty much everything! If you guys give Diamond and these other firms permission to send 500 or more big gravel trucks down Highway 33 every day, through Ojai, to Ventura, you will do irreparable harm to the air quality and to the quality of life of the people who live and work in Ojai. And you will be ruining the most popular recreation area of Ventura County residents as well, particularly those of us who live and work in West Ventura County. I understand that the empty trucks will also return to Cuyama via Highway 33 as well. What are you guys thinking?! I am writing to you to ask you NOT to issue a permit to the Diamond Rock Mine (or to the other firms). Gary, this is just a HUGE mistake! Don't do it! Consider the following.

HIGHWAY 33 IS OUR GATEWAY TO FOREST RECREATION

Those of us who live and work and pay taxes in Ventura County consider the Los Padres and the Santa Barbara backcountry the place where we go to seek peace and quiet and outdoor adventure. This area is our sanctuary. We hike, camp, backpack and fish in the Sespe Wilderness, bird watch in the Condor Sanctuary, ride our bicycles and motorcycles on Highway 33 in the mountains above Ojai, go shooting at the Ojai Valley Gun Club in Rose Valley, ride our dirt bikes at Ballinger Canyon and rock climb in Sespe Gorge. And all of us spend money in Ojai on our way up and down the hill: breakfast in the morning before a ride, dinner at the end of the day on our way home. But put 500 gravel trucks on Highway 33 every day and most of us will decide to just go somewhere else. Ojai's tourist-based economy will be devastated.

HIGHWAY 33 WILL BE TOO DANGEROUS FOR ANYONE ELSE TO USE

Imagine getting stuck behind one of these behemoths on a tight twisty two-lane road for 20 or 30 miles! Most of the road has a double yellow line so there's no way to pass a truck moving uphill at a crawl. And there are virtually no turnouts up there. There are also no shoulders along most stretches. I don't what will happen when one of these big monsters runs wide in a tight corner (of which there are literally hundreds) and runs a bicyclist or motorcyclist off the road. And how long will it be before a gravel truck driver loses control and hits and kills a bicyclist or motorcyclist? Or loses control, turns over and covers the road with gravel, closing the road for days, weeks or months. (I've lived here long enough to remember years when the road was closed for months because of a rock slide.) Gary, this whole scheme is a tragedy waiting to happen. Highway 33 is dangerous enough with the truck traffic that it has now. Why on earth would you want to turn it into a veritable truck lane? What if there's a big fire in the Los Padres? If you're from around these parts you already know that fires occur regularly up there and are already difficult enough to get to without having to share the road with up to 500 gravel trucks. I doubt that two big trucks could even negotiate some of the corners up there if they're going in opposite directions and arrive at a corner at the same time.

OJAI ALREADY HAS AIR POLLUTION PROBLEMS

Of course, these trucks will use diesel engines, so they will be spewing oxides of nitrogen (NOx) and particulate matter (PM) into the pristine mountain air day after day. Gary, did you know that Ventura County is not now nor has it ever been in attainment for ozone. Ozone is created when you mix NOx, reactive organic compounds (ROC) and sunlight. The way that air regulators reduce photochemical smog is by trying to reduce or eliminate NOx, which breaks the chain. And did you know that while Ventura County's overall air quality is classified as non-attainment with respect to ozone by both the California Air Resources Board (CARB) and by the Environment Protection Agency (EPA), that the air quality in the Ojai Valley is actually already far worse than the rest of our county, with exception of Simi Valley. Except that Ojai has only 30,000 people. See the problem here. Putting up to 500 diesel trucks in the Ojai Valley will degrade its air quality even further.

And Gary, quite aside from the serious health issues presented by diesel exhaust, some of us still need a little scenery once in a while. Right now the Los Padres backcountry has by and large escaped the dirty air found at lower altitudes down in the Ojai Valley itself. But put up to 500 trucks a day on Highway 33 and those magnificent mountain vistas will be gone. Instead, our beloved backcountry will look like the Eastern San Gabriel Mountains, i.e. invisible!

DIESEL EXHAUST IS A HEALTH THREAT TO KIDS

Gary, did I fail to mention in the previous paragraph that diesel exhaust is a known carcinogen? If these big old diesels were stationary sources instead of mobile sources the Ventura County Air Pollution District (APCD) would require that they be Best Available Control Technology (BACT), in other words, state of the art. But they're not. They're going to be a bunch of tired, worn out old clunkers with ancient diesel technology. Perhaps you read that *L.A. Times* article about what a mistake it was to have ever put schools next to freeways, because now we're finding out that that probably caused irreparable and incurable health problems for those kids. So I don't think that it would be a good idea to have hundreds of diesel trucks driving by Nordhoff High School and Miramonte Elementary, both of which are right next to Highway 33. How are the kids supposed to play outside their schools if they're breathing diesel exhaust all day long?

NOISE

Gary, do you know what a Jake brake is? It's a special braking system used on diesel engines. In a diesel there is no throttle plate inside the throttle body, so when you let off the gas on a diesel engine in a big truck going downhill the engine continues to consume big volumes of

air, which the pistons simply compress and expel, which maintains the crankshaft's inertia, so that it does little to slow down the vehicle. So diesels in big trucks are equipped with a Jacob Brake (or jake brake) system. An engine with a jake brake has an extra lobe on the camshaft to open a second exhaust valve at the top of the compression stroke, which releases the compressed air in the cylinder, which prevents the compressed air in the cylinder from returning its energy back to the piston, and the vehicle. Drivers of diesel trucks use jake brakes to slow down on steep downhill sections of road, which makes a characteristic chattering sound or machine gun noise when it's used. Using Jake brakes is actually prohibited in many residential areas because of this annoying noise. And my point? With up to 500 trucks a day constantly upshifting, downshifting, jake braking, hogging the road and honking their horns at anyone who gets in their way, it could get noisy. It's not going to be pretty. Hardly conducive to a tranquil wilderness experience!

TRAFFIC

Once these trucks arrive in the Ojai Valley, they will be driving on city surface streets that were never designed for this volume of traffic. And traffic is already dense in the Ojai Valley even without adding 500 gravel trucks. Perhaps you are aware that the Matilija Dam will soon be torn down, which will take years. And how are they going to move all that earth? That's right! In big diesel trucks, just like the gravel trucks that you are considering putting on these same streets. Add in rush hour traffic and other commercial truck traffic and you have a real mess.

OAJI HAS A TOURIST-BASED ECONOMY

Allowing hundred of diesel trucks to drive though the Ojai Valley will have the effect of turning it into a perpetual construction site. People don't really like to frequent restaurants, shops on streets that have been taken over by dirty, noisy gravel trucks. Very soon, people will just stop coming. And tourism is the economic lifeblood of this charming little town. Kill its tourist trade and you kill Ojai. Gary, you work in Santa Maria. Imagine sending hundreds of gravel trucks a day through the middle of Santa Maria. Imagine doing so down State Street in Santa Barbara! It would be unthinkable! So why is such a cockamamie scheme even seeing the light of day with respect to little Ojai?

CONCLUSION

Gary, you have a lot of stuff to think about before you even consider such an ill-conceived proposal as the Diamond Rock Mine's request for a permit. Ditto for the other three outfits hoping to make a buck on the backs of the residents of our county. Once more, I'm asking you not to even consider it. The damage that this project (and the other three projects) will cause far outweighs its one advantage, i.e. that it will provide gravel. Why not tell the applicant to have the trucks drive up to 166, and then either go west to the 101, or east to the 5? I know it's longer, but it's also safer, and probably just as fast.

Please don't hesitate to call or contact me if you have any further questions about where the Los Padres Chapter stands on this proposal. I am more than willing to meet with you to see whether we can find some middle ground.

Mike Stubblefield
Chair, Los Padres Chapter
Sierra Club