



June 1, 2009

VIA EMAIL & FIRST CLASS MAIL

Ventura County Resource Management Agency
Planning Division
Attn: Dan Klemann, Senior Planner
800 S. Victoria Ave. L#1740
Ventura, CA 93009
daniel.klemann@ventura.org

RE: Scoping Comments, Ozena Valley Ranch Mine

Dear Mr. Klemann:

Thank you for this opportunity to provide the Planning Division with comments on the proposal to modify the land use permit for the Ozena Valley Ranch Mine. The proposed modifications include the excavation of a second 15-acre stockpond, the importation of concrete and asphalt for recycling and processing on-site, and the doubling of the daily maximum number of truck trips from 100 to 200. The proposal includes as many as 100 daily truck trips on Scenic Highway 33, a narrow winding two-lane highway that cuts through the heart of the Los Padres National Forest in Ventura County.

Los Padres ForestWatch is a local, community-based nonprofit organization working to protect and restore the natural and cultural heritage of the Los Padres National Forest. We are supported by more than seven hundred members, including many Ojai residents and forest visitors who value our local backcountry for its wildlife habitat, scenic landscapes, and outdoor recreation opportunities. Since 2006, we have worked to reduce the level of gravel truck traffic cutting through the Los Padres National Forest, as it has a detrimental impact on wildlife, air quality, outdoor recreation, visitor safety, and a sense of quiet and solitude that people seek when visiting this remote area of the national forest. We encourage the County of Ventura to evaluate alternate routes that avoid the impacts inherent in using such a dangerous road for the transport of aggregate materials.

Highway 33 is a California State Scenic Highway and a National Forest Scenic Byway that takes travelers through the heart of the Los Padres National Forest. The highway passes within a few hundred feet of three Wilderness Areas – the Matilija, Sespe, and Dick Smith wilderness areas – and runs for a dozen miles along a stretch of Sespe Creek that is recommended for protection under the federal Wild & Scenic Rivers Act. The highway is the only access route to some of our region's most popular recreation areas, including Wheeler Gorge, Rose Valley, Piedras Blancas, and Pine Mountain. Excessive levels of truck traffic are harming the values of this scenic corridor, at a great price to local communities who are dependent on tourism and forest recreation.

Initially, we would like to repeat our request that the County place us on its mailing list to receive all future public notices and environmental documents related to this proposal. Much to our surprise, we did not receive a copy of the Notice of Preparation (“NOP”) from the County, despite the fact that we submitted detailed comments on the Initial Study/Draft Mitigated Negative Declaration on August 14, 2006; submitted a Public Records Act request on December 12, 2006; and specifically requested placement on your mailing list for this project on April 25, 2007 pursuant to the requirements of the California Environmental Quality Act (“CEQA”). We did not receive a copy of the NOP despite the fact that on April 30, 2007, the County notified us of its intent to prepare an Environmental Impact Report (“EIR”) for this proposal, based in part on one of the reasons outlined in our comments – the proximity of the project to the Ozena Campground, a sensitive noise receptor. Nor did we receive a notice of last month’s public hearing on this project. Please ensure that we receive copies of all future notices and environmental documents related to this project, as a failure to do so is a violation of CEQA. *See* Pub. Res. Code § 21092.2.

Despite this oversight, we appreciate that the County has taken the important step of preparing an Environmental Impact Report (“EIR”) for this project and that work is now underway. We ask that the County evaluate the following issues in the draft EIR for the Ozena Valley Ranch Mine. These comments supplement the May 6, 2009 comments that were submitted to the County by Chatten-Brown & Carstens on behalf of the Coalition to Stop the Trucks, of which we are a member. Thank you for your consideration of these additional issues specific to the Los Padres National Forest.



Scenic Highway 33 in the Los Padres National Forest.

Scenic and Visual Impacts

As you know, Highway 33 is a state-designated Scenic Highway, from milepost 17.5 near Wheeler Hot Springs to mile post 57.5 at the Santa Barbara/Ventura county line. It’s also one of only four officially-designated National Forest Scenic Byways in all of southern California, taking travelers through more than 37 miles of the Los Padres National Forest. The NOP states

that the project will generate an average of 66, and a maximum of 100, one-way trips each day traveling northbound and southbound on Highway 33 through the Los Padres National Forest.

The EIR should evaluate the impacts of truck traffic on the visual resources of the scenic highway/byway corridor, as well as to the highway's eligibility for classification as a Scenic Highway. The EIR should also analyze the consistency of the project with the Scenic Corridor Protection Program for Highway 33. This program is required by Cal. Streets & Highways Code § 261 and is designed to ensure that development is consistent with the scenic goals and values of the corridor. Even though these impacts may be transient, they are potentially significant impacts, particularly given the remote and undeveloped nature of the scenic highway corridor. Because of these impacts, the EIR should evaluate alternative routes to access points south via Interstate 5, including Lockwood Valley Road and Highway 166 and fully explore any environmental impacts associated with these alternative routes.

In addition to trucks, the mine itself is visible from several scenic pullouts along Highway 33 north of Pine Mountain Summit, as the highway descends into the Cuyama Valley. The EIR should evaluate these scenic impacts and how they may affect the eligibility of Highway 33 as a Scenic Highway. The EIR should also evaluate these impacts in relation to the Scenic Byway Corridor Management Plan.

The mine is located along – and visible from – Lockwood Valley Road, which is eligible for designation as a State Scenic Highway. The EIR should evaluate scenic impacts along Lockwood Valley Road, particularly with respect to how such impacts might affect the eligibility of the road for scenic status. The County should seek scenic status for Lockwood Valley Road as partial mitigation for any significant impacts. If additional berms are placed on the project site to screen the mining operations from Lockwood Valley Road, native vegetation should be used and the berm should be made to blend into the surroundings (not appear as an artificial berm).

Impacts to Forest Recreation

The Los Padres National Forest is one of the region's premier destinations for outdoor recreation. According to estimates by the federal government, more than 1.7 million visitors enjoy the Los Padres National Forest each year. U.S. Forest Service, Revised Visitation Estimates: National Visitor Use Monitoring Program, 2006 (available at <http://www.fs.fed.us/recreation/programs/nvum/>). The purpose of most (81%) visits to the Los Padres National Forest is “viewing natural features such as scenery” and “relaxing, hanging out, escaping noise.” U.S. Forest Service, Final Environmental Impact Statement, Volume 2 (Appendices) for Land Management Plans, Southern California National Forests, R5-MB-074-B, 2005, Table 423, page 370.

Highway 33 serves as the primary access route to popular recreation destinations in the southern Los Padres National Forest. Because of the popularity of the Highway 33 corridor for outdoor recreation activities, the Wheeler Gorge Visitors' Center – the only stand-alone visitors' center in the entire Los Padres National Forest – is located along the highway, directly across from the Wheeler Gorge campground. Many forest visitors cross Highway 33 as they walk from

the visitors' center to the campground and its nature trails. The Wheeler Gorge Campground hosts an average of 30-50 campers per night. U.S. Forest Service, Jacinto Reyes Scenic Byway Corridor Management Plan, 2004, p. 62). Highway 33 is also the only access route for two official recreation areas in the forest – the Rose Valley Recreation Area and the Pine Mountain Recreation Area.



The highway serves as a trailhead for several popular hiking, biking, and equestrian trails, including the Cozy Dell Trail, the Wheeler Gorge Nature Trail, the Middle Sespe Trail, the Potrero John Trail, the Chorro Grande Trail, the Bear Canyon Trail, the Boulder Canyon Trail, and numerous unnamed trails. Many forest visitors use a series of narrow, informal pullouts along Highway 33 to park their vehicles and explore the area. The highway also provides access to trails leading into the Sespe, Matilija, and Dick Smith wilderness areas, including the Gene Marshall-Piedra Blanca National Recreation Trail.

Highway 33 is also known for its popular rock climbing sites, including Munson and Reese Boulders, Pine Mountain Inn, Potrero John, the Black Wall at Sespe Gorge, Wheeler Gorge, and many other named boulders and climbing routes. Several swimming holes are located immediately alongside the Highway in the North Fork of Matilija Creek. It's also a popular route for bicyclists and is a world-class motorcycle route.



In a letter to Santa Barbara County regarding the nearby Diamond Rock Mine, the U.S. Forest Service states that “[h]eavy commercial truck traffic on SR33 generates significant noise, including noise from ‘Jake’ brakes that carry for several miles along and beyond the highway corridor. Excessive truck noise has a direct negative effect on camping at Wheeler Gorge, Rose Valley, and Pine Mountain campgrounds, and dispersed recreation such as swimming, snow play, and hunting.” We have attached a copy of the Forest Service’s letter for your review.

In addition to recreational impacts caused by trucking, the mine itself may also adversely affect forest recreation. The mine is located only one-quarter mile away from the Ozena Campground. The County’s April 30, 2007 letter states that “mine related noise at that distance can have a significant noise impact.” The EIR should evaluate the impacts of mining noise on this campground. The mine is also visible from several surrounding wilderness areas and trails, including less than one mile away from the Boulder Canyon Trail. People visit these areas to enjoy the quiet, undeveloped surroundings and for “escaping noise.” The mine is a large-scale industrial project in a relatively undeveloped area surrounded by national forest land on all sides.

The EIR should evaluate the impacts the mine operations on the forest recreation experience. The EIR should select and assess the impacts to several “key observation points” in the forest, and also along Highway 33, that are frequented by forest visitors and representative of the truck-related impacts to forest recreation. The EIR should also evaluate the impacts of truck traffic on bicycling and motorcycle riding, as heavy truck traffic presents unique safety concerns to these recreationists that must be analyzed and mitigated.

Impacts to recreation are heightened during times of high visitation in the national forest, such as on weekends and holidays. If trucks are allowed to travel through the forest, please consider prohibiting any truck travel on weekends and holidays. The current proposal includes unrestricted trucking on Saturdays, the busiest recreation day of the week.

Road Safety

Highway 33 is a narrow, winding two-lane highway that cuts through the heart of the Los Padres National Forest. It has few pullouts and no passing lanes through the national forest portion of the highway, but does contain dozens of sharp hairpin turns, narrow bridges and sections of road, and a series of three narrow tunnels. For these reasons, the California Department of Transportation recommends that trucks longer than 30 feet kingpin to rear axle not use this road.

The EIR should disclose the dimensions of trucks associated with the mine, and also recognize that several different types of trucks (all with varying dimensions) are used to transport sand and gravel (and recyclable material) to and from the mine. These dimensions should include the width of the side mirrors, which are typically the widest part of the truck. The EIR should contain a section on road safety and evaluate the dimensions of these trucks in relation to CalTrans’ 30-foot recommendation. This evaluation is important because our conclusion, based

on extensive field observations, suggests that large trucks are unable to navigate the sharp curves of Highway 33 without crossing over the double-yellow line into oncoming traffic.



The EIR should also contain a detailed evaluation of the three Matilija tunnels, including the width of these tunnels at ground level and truck level. The EIR should evaluate the typical behavior of trucks in these tunnels of driving on or over the double-yellow line marking the center of the road. The EIR should evaluate what happens when the very likely scenario occurs of two trucks passing through the tunnel at the same time, and also of one truck and one vehicle passing through the tunnel at the same time. The EIR should consider placement bicycle signals at each tunnel to notify truck drivers that a bicyclist is in the tunnel. Finally, the EIR should evaluate the safety issues involved with one of the tunnels that contains a blind sharp curve.



The EIR should evaluate the numerous sharp curves in Highway 33, as well as the steep inclines and declines on the Matilija and Pine Mountain sections of the road. Our field observations indicate that trucks routinely cross the double-yellow center line on the highway on many of these curves. The EIR should contain a permit condition requiring truck drivers to obey all provisions of the California Vehicle Code.

The width of Highway 33 varies greatly, and in some areas, the road is narrower than a typical gravel truck. The EIR should disclose the measurements of the road at its narrowest points. For example, we observed one particularly narrow section of the road that contains a lane width of only 9' 1" and evidence of truck tires routinely traveling off the road because it is too narrow to accommodate their width. The EIR should evaluate safety issues involved with these narrow sections of the road.



Highway 33 is routinely closed during winter months due to washouts, landslides, and snow accumulations. During the winter it is also icy, as warned by 19 signs along the highway warning of snow or ice on the road. The EIR should prohibit truck travel through the forest during icy, snowy, and other dangerous conditions, and should evaluate the public safety issues involved with heavy trucks traveling in icy and snowy conditions. Rocks and boulders frequently fall onto the highway, and the EIR should evaluate public safety issues concerning heavy trucks swerving into opposing traffic to avoid these obstacles.



The EIR should contain a thorough evaluation of traffic collisions on this stretch of highway, relying on data and collision reports from the California Highway Patrol, Ventura County Sheriff, CalTrans, and the U.S. Forest Service. The EIR should disclose the number of these accidents that involve gravel trucks, and the number of accidents caused by gravel trucks. Our previous analysis of CHP collision reports revealed that, in collisions involving trucks, trucks were at fault 90% of the time due to reasons such as unsafe speed, improper driving, wrong side, inattention, unfamiliar with road, and failure to obey sign. Please consider including a permit condition requiring the mine operator (and all drivers and independent contractors) to report any traffic collisions to the County so that the County can easily monitor these incidents. The mine operator should also be required to reimburse any public agencies, including the Forest Service, for the costs associated with responding to these accidents when the truck is at fault.



As part of the EIR analysis, the County should prepare a geometric study that takes into account the curvature of the highway, its steep grade, safety issues, road stability, and engineering, and summarize the findings of this study in the EIR.



If any gravel trucks will use Lockwood Valley Road to travel between the project site and Interstate 5 and points in between, the EIR should include a similar analysis of safety issues for that road, too, including a discussion of how many trucks per day will use that road.

Finally, the EIR should evaluate the impact of heavy truck traffic on the highway itself. According to the U.S. Forest Service, “[e]xisting gravel truck traffic has created a perpetual need for highway maintenance.” This repeated maintenance, in turn, affects public access to the area. The EIR should evaluate the impacts of gravel truck traffic on the highway surface and the resulting impacts to public access when this road is closed or restricted for maintenance. The mine operator should be required to pay for its fair share of this road’s maintenance costs.

Impacts to Sespe Creek

The federal Wild & Scenic Rivers Act provides protection for rivers that possess “outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values,” and seeks to preserve these rivers in their free-flowing condition. The Act also states that “their immediate environments shall be protected for the benefit and enjoyment of present and future generations.” 16 U.S.C. §§ 1271. These protections apply to the river itself, as well as the “related adjacent land area.” 16 U.S.C. § 1272(b).

The revised Land Management Plan for the Los Padres National Forest recommends for Wild & Scenic River designation a stretch of Sespe Creek along Highway 33. This segment of Sespe Creek extends for 11.5 miles, from Chorro Grande Canyon to Rock Creek. Specifically, the Land Management Plan states:

Sespe Creek has exemplary visual features, including contrasts created by large rock outcroppings and seasonal colors, and water that attracts regional and national attention. Below Chorro Grande Canyon, Sespe Creek offers excellent dispersed recreation opportunities, such as swimming and wading, picnicking, backpacking, hiking, horseback riding, bicycling, rock climbing, hunting, fishing, photography, driving for pleasure and viewing scenery on the adjacent scenic byway.

U.S. Forest Service, Land Management Plan Part 2: Los Padres National Forest Strategy, 2005, pp. 94-95. In the Forest Service’s eligibility study of this segment (available at <http://www.fs.fed.us/r5/scfpr/projects/lmp/docs/wildandscenicrivers.pdf>), the agency recognized its “outstandingly remarkable” scenic, recreational, and wildlife values, stating:

Recreation activities below Chorro Grande Canyon include swimming and wading, picnicking, backpacking, hiking, horseback riding, bicycling, rock climbing, hunting, fishing, photography, and driving for pleasure with outstanding visual experiences. All but two miles of this segment is near State Highway 33. As a California Scenic Highway and National Forest Scenic Byway, State Highway 33 has the potential to draw visitors from throughout California and the nation....

Visitors can choose among a variety of dispersed recreation opportunities as listed above. As recreation use increases on the highway, it demonstrates the willingness of visitors to travel long distances to use the river resources for recreational purposes. Interpretive exhibits are planned along the highway, and have the potential to attract visitors from outside the region. *River access would be mostly from the shoulder of State Highway 33.*

(emphasis added) (see pp. 232-248). This study noted that 12 miles of this segment are visible from the scenic byway, and vice versa. Given the outstandingly remarkable values of this corridor, along with the fact that most river access is from the shoulder of Highway 33, the Ozena project may have a significant impact on the eligibility of this stretch of river for Wild & Scenic designation. The EIR must evaluate and mitigate this impact to the fullest extent possible.

In addition, this stretch of Sespe Creek is designated as an “Area of High Ecological Significance” by the U.S. Forest Service. Stephenson, J.R. and Calcarone, G.M. 1999. *Southern California mountains and foothills assessment: habitat and species conservation issues*. General Technical Report GTR-PSW-175, Pacific Southwest Research Station, Forest Service, U.S. Department of Agriculture, pp. 348-349. Available at <http://www.fs.fed.us/psw/publications/documents/gtr-172>. The EIR should evaluate impacts from heavy trucking to the ecological health of Sespe Creek.

Air Quality

The federal Clean Air Act defines Class I airsheds as “all...national wilderness areas which exceed 5,000 acres in size...and which are in existence on the date of the enactment of the Clean Air Act Amendments of 1977” or airsheds redesignated as Class I airsheds by the State of California (42 U.S.C. §7472(a); 42 U.S.C. § 7474(a)). The Ozena mine and associated truck traffic may impact three wilderness airsheds – the Matilija Wilderness Area, the Dick Smith Wilderness Area, and the Sespe Wilderness Area. These impacts must be disclosed, evaluated, and mitigated in the EIR.

Wildlife Impacts

The EIR should address impacts to wildlife and habitat at the proposed mine site as well as potential wildlife impacts caused by truck traffic through the national forest. We are primarily concerned with the increased probability of vehicle strikes caused by truck traffic, particularly with respect to mammals like the San Joaquin kit fox, mountain lion, bear, and deer that cross Highway 33. The San Joaquin kit fox is particularly susceptible to vehicle strikes. Increased vehicle strikes are most likely to occur between dusk and early morning hours, when a majority of truck traffic occurs. The EIR must disclose this potential impact and propose effective mitigation measures.

The mine site is located between Bitter Creek National Wildlife Refuge and Hopper Mountain National Wildlife Refuge. The former is the primary release site for condors into the wild, while the latter is the primary nesting area for the endangered bird. The County should consult with the U.S. Fish & Wildlife Service to determine the extent of condor activity in and around the mine site, and should require the mine operator to keep the mine site clear of microtrash, which is harmful to condors.

The Upper Cuyama Valley is also designated as an Area of High Ecological Significance by the U.S. Forest Service. Stephenson and Calcarone, 1999 at pp. 349-350. The EIR should evaluate the impacts to this high ecological significance which includes “unique topography and habitats and contains relictual populations of several plant species.” *Id.*

Water Quality and Quantity

The Ozena mine extracts water from the Cuyama Valley Groundwater Basin, which is currently in a state of overdraft of about 25,000 to 30,000 acre-feet per year, causing groundwater levels to drop by as much as 300 feet in some portions of the basin. A drop in groundwater levels may have a significant impact on groundwater and surface water levels in the national forest lands that surround the mine, resulting in a decline in aquatic habitat and riparian vegetation upstream in the national forest. Please evaluate and mitigate these impacts in the EIR.

Compliance With National Forest Management Plans

The EIR should evaluate whether the mine and associated truck traffic comply with the 2005 Los Padres National Forest Management Plan, available on the web at <http://www.fs.fed.us/r5/scfpr/projects/lmp/read.htm> . Part 2 of this plan includes a “Desired Condition” for the Highway 33 corridor on pages 59-61.

The EIR should also evaluate whether the project complies with the U.S. Forest Service’s Jacinto Reyes National Forest Scenic Byway Corridor Management Plan, available on the web at <http://www.fs.fed.us/r5/lospadres/projects/byway> . The EIR should pay particular note to the management objectives outlined in the plan, which include “high quality recreation opportunities” in “predominantly natural settings,” as well as maintaining the “high scenic integrity of the corridor, as viewed from the Scenic Byway and associated activity nodes.” *See* p.3.8-14. Such activity nodes may include campgrounds, trails, swimming holes, and other popular recreation sites.

Cumulative Impacts

The CEQA Guidelines define cumulative impacts as “the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.” CEQA Guidelines § 15355(b). An EIR must contain an analysis of all cumulative impacts. *Id.* at § 15130(a) (stating that an EIR “shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.”)

The EIR should evaluate the impacts of the Ozena mine along with other existing and proposed mines in the area, including the Diamond Rock Mine, GPS Mine, Lima Gypsum Mine, TXI Mine, and the Ojai Quarry.

The cumulative impacts analysis must also include an evaluation of other high-intensity resource extraction activities in the area. For example, in June 2006, the U.S. Bureau of Land Management made available for oil and gas leasing several parcels of land in and near the Cuyama River, and may offer additional parcels in this area for lease in the foreseeable future. And in 2005, the U.S. Forest Service released a Final Environmental Impact Statement on its plans to increase oil drilling in the Los Padres National Forest. One of the three new drilling areas – the South Cuyama HOGPA – is located within a few miles of the project site, and could contribute to cumulative impacts, particularly with respect to traffic and air pollution.

Truck Trips

In establishing baseline data for the current number of truck trips on Highway 33, it is important to gather data that reflects typical use of the highway. Highway 33 can be closed for weeks or months during the winter due to snow and landslides, and data averaged during this time will reflect artificially low traffic volumes that could skew a cumulative impacts analysis. Likewise, traffic data gathered during times of low economic activity may also reflect artificially low traffic volumes. Please ensure that your baseline data is based on typical traffic numbers.

Enforcement

The EIR should discuss mechanisms to effectively monitor and enforce any and all permit conditions associated with the mine and its truck traffic. If trucks are observed violating permit conditions as they travel through the forest, and such violations are reported to the County, sufficient measures must be in place for the County to be able to immediately identify whether the truck is associated with the Ozena mine or some other mine in the area. The EIR should also discuss the County's ability to effectively monitor permit conditions, and should require the applicant to pay money into a fund so that the County has the resources necessary to ensure that any monitoring program is effective, frequent, and consistent.

Thank you for considering these important issues. I would be happy to discuss them with you in more detail, and look forward to reviewing the draft EIR.

Sincerely,

/s/

Jeff Kuyper
Executive Director



United States
Department of
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Forest
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Los Padres National Forest

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File Code: 1560/1970/2370

Date: February 1, 2007

County of Santa Barbara Planning Department
Attn: Gary Kaiser
24 W. Foster Road
Santa Maria, CA 93455

Re: Diamond Rock Sand and Gravel Mine, Santa Barbara County

Dear. Mr. Kaiser:

Thank you for the opportunity to provide input regarding the proposed Diamond Rock Sand and Gravel Mine operation in the Cuyama Valley. Our concerns are related to the projected significant increases in truck traffic on State Route 33 through Los Padres National Forest.

The Chief of the Forest Service in 1995 designated the segment of SR33 through Los Padres National Forest as the "Jacinto Reyes National Forest Scenic Byway." The byway was established because of the highway corridor's outstanding scenic, cultural, historic and interpretive values. This segment of SR33 provides an exceptional motor touring opportunity, offering views and access to four congressionally designated wilderness areas and the Sespe Wild and Scenic River corridor. SR33 serves as a key access point to the national forest for recreationists from Kern, Santa Barbara, Ventura, and Los Angeles Counties; it also attracts visitors from around the world. Additionally, SR33 is a State Scenic Highway. The California Scenic Highway Program serves to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways.

It is our understanding that the volume of gravel truck traffic (currently 60 vehicles per day) is expected to at least double with this proposal. In addition to the general incompatibility of gravel truck traffic with scenic byway values, the Forest Service is concerned about the following specific issues:

1. Public Safety – Public safety on SR33 is a key concern to us in our role as first responders (along with the CHP) to vehicle accidents on the highway. The highway is narrow and twisting, and contains several tunnels. The highway's design leaves little room for driver error or evasive action such as swerving to avoid rocks on the highway. Increased truck traffic may result in increased vehicle accidents.
2. Noise – "Driving for pleasure" is one of the most popular activities in Los Padres National Forest. Heavy commercial truck traffic on SR33 generates significant noise, including noise from "Jake" brakes that carries for several miles along and beyond the



highway corridor. Excessive truck noise has a direct negative effect on camping at Wheeler Gorge, Rose Valley, and Pine Mountain campgrounds, and dispersed recreation such as swimming, snow play and hunting.

3. Air Pollution – Diesel exhaust from an increased number of gravel trucks hauling heavy loads through mountainous terrain may further deteriorate the air quality in the four adjacent wildernesses and the Wild and Scenic River corridor.
4. Delayed Access – Existing gravel truck traffic has created a perpetual need for highway maintenance. Patching or repaving the highway surface is constant affecting public and emergency use of the road. Increased truck traffic will increase the frequency of maintenance activity.

In summary, we believe that the proposed increase in gravel truck traffic on SR33 through Los Padres National Forest would result in significant social and public safety impacts that cannot be mitigated. If you have any questions about our concerns, then please call District Ranger John Bridgwater at 805-646-4348.

/s/ Kenneth E. Heffner
KENNETH E. HEFFNER
Forest Supervisor