

Appendix I

**County of Ventura, November 21, 2019: Ventura County Public Works Agency
Transportation Department Memorandum**



County of Ventura
Public Works Agency
Transportation Department
MEMORANDUM

DATE: November 21, 2019
TO: RMA - Planning Division
Attention: Kristina Boero
FROM: Transportation Department *OH*

SUBJECT: APPLICATION COMPLETENESS
PROJECT NO: PL 13-0158 (CUP 3543) Revision 5
Property Owner: South Mountain Resources, LTD.
Applicant/Permittee: Carbon California Company, LLC
Modification to Conditional Use Permit (CUP) 3543 for an extension of 25 years, the drilling of two new oil and gas wells and authorize the full-time use of an existing natural gas flare
Koenigstein Road, Santa Paula, CA 93060
APN 040-0-220-165

Pursuant to your request, the Public Works Agency Transportation Department (PWATD) has reviewed the subject application and has determined that the application is **complete** for our areas of responsibility.

Modification to CUP 5343 is a request by the applicant to allow the following: 1. The continued operation of the existing oil and gas production facilities authorized by CUP 3543 for an additional 25 years; 2. The drilling of two new oil and gas wells on the existing graded pad that was authorized by CUP 3543; 3. The re-drilling of one of the existing oil and gas wells authorized by CUP 3543; 4. Allow the use of Koenigstein Road so that the project-related trucks can use the roadway to access the project site; 5. Authorize the full-time use of an existing natural gas flare at the project site for excess produced gas.

Other project related components remain unchanged, including requests to: allow the continued operation of existing oil production equipment at the project site, re-drill one existing well, allow project-related tanker trucks to use Koenigstein Road, and allow the full-time use of an existing gas flare at the project site. The existing CUP authorized up to 12 tanker truck loads (24 one-way trips) of produced fluid to be exported from the site per week. It is proposed that the authorized number of large project-related truck trips be reduced to a maximum of eight (8) tanker truck loads (16 one-way trips) per week. The actual number of tanker truck trips generated by the proposed project would likely be lower than the maximum number of permitted trips because the proposed new oil wells would be served by the same truck that currently serves the three existing oil wells at the project site. In addition, the same tanker truck that currently serves the project site also serves other oil wells located along Koenigstein Road that are operated by the project applicant. All tanker trucks operation would occur during daylight hours Monday – Friday between, 7:30 am and 6:30 pm. For purpose of the request CUP modification, the term

“tanker truck” refers to any vehicle that is hauling produced fluid (including oil, drilling fluids and brine) to or from the site.

The drilling period for each new or re-drilled oil well would occur over a period of approximately two weeks. Drilling operations for each well new or re-drilled well would require approximately 20 workers and 16 trucks that would deliver and remove drilling equipment. Over a two-day period 16 truck trips (8 trucks per day) would bring drilling equipment from the site. During proposed drilling operations, it is anticipated that a few truck trips would occur per day to deliver drilling fluids (mainly water) to the site. The arrival and departure of temporary drilling rig personnel would involve up to 40 vehicles trips per day. A truck-mounted drilling rig would be moved onto the site and remain for approximately two weeks for each new well and the re-drilled well. At times when a drill rig is moved onto or off the project site, the project operator would implement a traffic control plan. The traffic control plan would be designed to avoid potential traffic related conflicts at and near the State Route 150/Koenigstein Road intersection. At minimum the traffic control measures would include the use of warning signs and flagmen on State Route 150 and Koenigstein Road in the vicinity of the intersection.

Although the existing CUP does not limit the number of vehicle trips associated with maintenance and operation of production facilities, the project applicant proposed the limit maintenance and operation traffic to 14 maintenance visits per week (i.e. 28 one-way trips). Maintenance-related vehicle trips would typically be by a standard pickup truck.

The Initial Study Checklist and responses to the Checklist are made part hereof. Our review is limited to the impacts this project may have on the County’s Regional Road Network.

INITIAL STUDY CHECKLIST
PUBLIC FACILITIES/SERVICES SECTION
TRANSPORTATION/CIRCULATION

	<u>ISSUE</u> (Responsible Department)	<u>PROJECT IMPACT DEGREE OF EFFECT*</u>				<u>CUMULATIVE IMPACT DEGREE OF EFFECT*</u>			
		N	LS	PS-M	PS	N	LS	PS-M	PS
PUBLIC FACILITIES /SERVICES:	<u>Transportation/Circulation:</u>								
	A. Public Roads and Highways:								
	(1) Level of Service (PWA)		X				X		
	(2) Safety/Design (PWA)		X				X		
	C. Pedestrian/Bicycle:								
	(1) Public Facilities (PWA)		X				X		

DEGREE OF EFFECT:

- N = No Impact
- LS = Less Than Significant
- PS-M = Potentially Significant Impact Unless Mitigation Incorporated
- PS = Potentially Significant Impact

STUDY STANDARD DISCUSSIONS

PUBLIC FACILITIES/SERVICES

27. Transportation/Circulation

Item A. Public Roads/Highways

(1) Level of Service

Environmental Analysis:

The project, as proposed, will generate additional traffic on the local public roads and the Regional Road Network, but does not have the potential to alter the level of service (LOS) of the roadways that will be used by the project.

To address the cumulative adverse impacts of traffic on the Regional Road Network, Ventura County General Plan Goals, Policies, and Programs Section 4.2.2-6 and Ventura County Ordinance Code, Division 8, Chapter 6 require that the Transportation Department of the Public Works Agency collect a Traffic Impact Mitigation Fee (TIMF) from developments. This project is subject to this Ordinance. With payment of the TIMF(s), the Level of Service (LOS) and safety of the existing roads would remain consistent with the County's General Plan.

Therefore, adverse traffic impacts relating to LOS will be Less Than Significant.

(2) Safety/Design

Environmental Analysis:

The project, as proposed, does not have the potential to alter the level of safety of roadways and intersections near the project.

Therefore, impacts related to safety/design of County roads will be "Less than Significant".

Item C. Pedestrian/Bicycle

(1) Public Facilities

Environmental Analysis:

The proposed project will not generate significant pedestrians or bicycle traffic.

Therefore, the adverse impacts relating to the supplementary addition of pedestrians and bicycles into the area will be "Less than Significant."

STANDARD LAND DEVELOPMENT CONDITIONS OF APPROVAL

PUBLIC FACILITIES/SERVICES

Transportation/Circulation

1. TRAFFIC IMPACT MITIGATION FEE:

Purpose: To address the cumulative adverse impacts of traffic on the Regional Road Network, Ventura County General Plan Goals, Policies, and Programs Section 4.2.2-6 and Ventura County Ordinance Code, Division 8, Chapter 6 require that the County of Ventura, Public Works Agency, Transportation Department (PWATD) collect a Traffic Impact Mitigation Fee (TIMF).

Requirement: The applicant/permittee shall deposit with the PWA – Transportation Department a TIMF. The trip generation rate and TIMF will be calculated based on the applicant's information and the County of Ventura Records. The applicant/permittee may choose to submit additional information or provide an updated Traffic Study to supplement the information currently provided to establish the trip generation rate. The TIMF may be adjusted for inflation at the time of deposit in accordance with the latest version of the Engineering News Record Construction Cost Index.

a) The TIMF due to the County of Ventura would be:

$$\$20.60 = 2 \text{ ADT} \times \$10.30^{(3)} / \text{ADT}$$

b) The TIMF due to the City of Ojai would be:

$$\$71.74^{(5)} = 2 \text{ ADT} \times \$35.87^{(4)} / \text{ADT}$$

Total ADT⁽¹⁾⁽²⁾:

The total ADT is base on the permit allowing a total of five (5) gas and oil wells. The applicant proposes 8 truck trips (16 one-way trips) per week for oil and gas hauling, and 14 maintenance trips (28 one-way trips) per week for maintenance.

$$6 \text{ ADT} = (40 \text{ total trips} / \text{week}) / (7 \text{ days} / \text{week})$$

$$40 \text{ total trips} / \text{week} = 16 \text{ truck trips} / \text{week} + 24 \text{ maintenance trips} / \text{week}$$

Proposed ADT⁽¹⁾⁽²⁾:

The proposed ADT is based on the permit allowing a total of two (2) new gas and oil wells, or 2/5th of the total number of wells. Proposed ADT will be 2/5th of the total ADT.

$$2 \text{ ADT} \approx 2.4 \text{ ADT} = 6 \text{ ADT} \times (2/5)$$

Existing ADT⁽¹⁾⁽²⁾:

The existing ADT is based that there are existing a total of three (3) gas and oil wells, or 3/5th of the total number of wells. Existing ADT will be 3/5th of the total ADT.

$$4 \text{ ADT} \approx 3.6 \text{ ADT} = 6 \text{ ADT} \times (2/5)$$

Notes:

- (1) Trip Generation established by using the project description provided by the applicant. The applicant did not provide any information on existing trips used by 3 wells, only the total number of trips allowed if the applicant was using 6 wells. Since there are only 3 wells the existing trips are what are currently being used, not what the permit allowed for. The applicant can provide additional documentation on the trips being generated by the existing 3 wells at which time the TIMF will be re-evaluated.
- (2) The trips generated by the project shall be used as a baseline level so that the TIMF may be computed for future increases to the trip generation. Based on the applicant's information the existing baseline level is 4 Average Daily Trips (ADT). With the proposed expansion, that will generate an additional 2 ADT, the new proposed baseline level will be 6 Average Daily Trips (ADT). (TD - 4, RMA – 138).
- (3) County of Ventura TIMF for the Average Daily Trips in the Ojai Area District # 1.
- (4) The City of Ojai Reciprocal TIMF for the Average Daily Trips.
- (5) The TIMF due to the City of Ojai is to be transferred to the City within 30 calendar days in accordance with the reciprocal traffic mitigation agreement between the City and the County of Ventura.

Documentation: The applicant/permittee shall come to the PWA Transportation Department counter, fill out the TIMF form, and pay the TIMF. The applicant/permittee shall provide a copy of the Conditions of Approval for the project. The fee may not be collected without sufficient documentation.

Timing: This condition shall be met prior to the issuance of a building permit or zoning clearance, whichever comes first.

Monitoring and Reporting: The PWATD will review and approve the payment of the TIMF. (TD – 1, RMA – 135)

COMMENTS:

Regarding safety, the Ventura County Public Works Agency, Transportation Department (PWATD) makes no change to the comments provided on July 26, 2016. PWATD concurs with the findings in the Traffic Study prepared by ATE on July 18, 2016. Highway 150 at the intersection of Koenigstein Road and Highway 150 has a low volume of traffic.

To analyze an intersection for safety concerns, the accepted method is to review collision history in the area and at the intersection. Typically, the data that is used is a minimum of 3 years and a maximum of 5 years of available collision data. However, for this project we considered much more data. In the 20 years that the oil and gas company has been using Koenigstein Rd. there has been no evidence of tanker truck related collisions. Since there is no evidence that there have been collisions with in that timeframe, PWATD finds no nexus to require the project applicant to consider alternative routes of travel for the tanker truck related trips for the site.

In addition, from the location of the bridge to the location of the private access road used by the project, the pavement width on Koenigstein road is approximately 32 feet, with one twelve-foot wide travel lane in each direction. The pavement width at the bridge is 24 feet, with two travel lanes. The 1980 EIR states, "Koenigstein Road is a 14-foot-wide paved road with graded dirt shoulders". Koenigstein more than ½ a mile north of the project location has a narrower pavement width then 32 feet, but that does not affect the trucks that will used this project's site. The statement in the 1980 EIR of trucks having to pull over to allow another truck to pass is not a factor for this project on Koenigstein Road.

