



# SOUTHERN PACIFIC MILLING COMPANY

READY-MIX CONCRETE

ROCK & SAND

ASPHALTIC CONCRETE

May 15, 1998

Ventura County Resource Management Agency  
Planning Division  
800 South Victoria Avenue  
Ventura, CA 93009

Attention: Kim Prillhart  
SMARA Coordinator

Subject: Modification To CUP 2425  
El Rio

Dear Ms. Prillhart:

S.P. Milling hereby withdraws the CUP 2425 modification requested dated 7/18/97. A revised modification request is described below. The purpose of the revision is to address concerns raised by Ventura County, the City of Oxnard, and the EDC.

Attached is a revised plot plan for the subject CUP modification. The modification would allow for excavation of CUP 2425. Please note the following:

1. The proposed excavation is based on the following criteria:
  - a. Excavation is to 5' above the historic high groundwater level.
  - b. 2:1 slope from the property line to an elevation that is 10 feet below the top of the Flood Control District levee. Below this elevation, the slope is 10:1.
  - c. 2:1 slopes between CUP 1942 and the excavated area in CUP 2425. The height of the slope cannot be determined until the final grades for CUP 1942 are determined in the revised reclamation plan.
2. The proposed excavation will generate approximately 1.6 million cubic yards. All fill generated by the excavation will be used to reclaim pits within CUP 1942. None of this fill will be used in Area 1.
3. CUP 2425 would be excavated in two phases (see attached map). Phase 1 would involve removal of approximately 0.6 million cubic yards from portions of the CUP that do not contain plant facilities or would not be needed for stockpile areas. Plant facilities include two ready mix plants, an asphalt plant, a rock and sand plant, a recycler, a shop area, and offices. Phase 2 would involve removal of approximately 1 million cubic yards from the remaining portions of the CUP that contain plant facilities and stockpiles.
4. The proposed modification will not authorize relocation of plant facilities or extension of CUP 2425. Permit extension will be processed in accordance with the existing conditions of the CUP. The sole purpose of the modification is to commit plant material to pit refill.
5. It is anticipated that the stockpile area in the southwest portion of CUP 1942 would be excavated prior to the plant site. CUP 1942 could be excavated in accordance with either the existing approved reclamation plan or a revised reclamation plan. Excavation within CUP 2425 would start only after reclamation for the entire El Rio site (CUP's 1942 and 2425) has been defined and approved.
6. A reclamation bond will be posted for the revised reclamation plan, including the excavation of 1.6 million cubic yards.

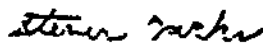
7. S.P. Milling agrees to conduct a phase 1 survey to define areas of potential contamination. A quality control program will then be developed based on the results of the survey. The program will define what contaminants need to be tested, the frequency of testing, and other specifics. Phase 2 assessments will be conducted as needed. The quality control program will be subject to approval by both the County and the Regional Water Quality Control Board. Only uncontaminated material that satisfies the permeability requirements defined in CUP 1942 will be used for pit refill. Any contaminated material identified by testing will be disposed of as required by law.

8. Slope stability and vadose zone standards will be complied with, as determined by the County's environmental and permit review process.

S.P. Milling appreciates timely processing of the modification request so that CUP 2425 material can be considered in the financial assurance calculation for CUP 1942.

Please contact this office if there are any questions.

Sincerely,



Steven Zacks  
Property/Environmental Administrator

cc Matt Winegar- City of Oxnard; Bill Berger, Earl Bouse, Dave Hummel- Kaiser Materials