

**SANTA MONICA MOUNTAINS CONSERVANCY**

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September 25, 2017

Brian R. Baca, Manager, Commercial and Industrial Permit Section  
Ventura County Resource Management Agency  
Planning Division  
800 South Victoria Avenue, L#1740  
Ventura, California 93009

**Notice of Preparation Comments - Pacific Rock Quarry Mine Expansion Project,  
Case No. LU10-0003, SCH NO. 2017081052**

Dear Mr. Baca:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Notice of Preparation (NOP) of a draft Environmental Impact Report (DEIR) for the proposed Pacific Rock Quarry Mine Expansion Project on 204.5 acres near Camarillo. The MRCA owns an open space parcel (APN 234-0-080-380) that abuts the subject property. The quarry also abuts Conejo Open Space Conservation Authority (COSCA) open space.

The proposed expansion of mining operations would more than triple the total area subject to mining activity (from 55 acres to 172.5 acres). The proposed eastward mining perimeter expansion would be less than 50 feet from MRCA and COSCA parkland. This expansion would likely result in significant adverse impacts to open space and habitat values and the ground water retention capability of the public parkland due to the increased noise, dust, and disturbance over long time periods. The DEIR must consider project alternatives that provide for minimum 750-foot-wide, non-disturbance buffers from all adjacent parkland. If any existing mining boundary is less than 750 feet from parkland, that boundary must be maintained and not reduced.

The DEIR should analyze the delineation of zones of planned mining activity and non-activity on a rolling five-year basis over the course of the Conditional Use Permit (CUP) in order to minimize disturbance of adjacent habitat areas. Those areas identified as non-active within the proposed mining area should remain native habitat prior to active mining and be reclaimed as native habitat as quickly as feasible following mining cessation.

Additionally, the proposed project anticipates increasing operational days to 7 days per week with up to 120 one-way truck trips per operational day. This increase in operational hours and truck traffic will generate more dust and diesel exhaust emissions. EIR project alternatives should consider a paving plan for the unpaved portions of the quarry that receive the bulk of the truck traffic for the anticipated 25-year extension of the CUP.

Because there are several unnamed tributaries to Conejo Creek in the heart of the proposed project disturbance zone, and the proposed project anticipates expanding into the steep slopes of Conejo Mountain, DEIR alternatives should evaluate the use of over-sized, concrete-free drainage detention basins to minimize sedimentation of downstream waterways. The recent fire and mudslides to affect this area (2013 and 2014, respectively) are evidence that Conejo Mountain and the surrounding hillsides are susceptible to debris flow events. The soft-bottom, concrete-free detention basins should be over-sized to capture sediment for a 100-year, 24-hour storm event and to dramatically reduce (or eliminate) sediment removal intervals. Examination of Ventura County's GIS CountyView indicates a portion of the existing active mining area is already with a 100-year Floodplain area, thus potential flood impacts to adjacent properties must also be analyzed in the DEIR.

Conejo Mountain is the last remaining undeveloped open space between the western Santa Monica Mountains and the Santa Rosa Valley. Therefore, the EIR must include alternatives that permanently preserve viable habitat for north-south wildlife passage between Conejo Creek and the Dos Vientos subdivision. The Conservancy requests that DEIR alternatives include a permanently protected contiguous habitat area along the northern, eastern, and southern boundaries of the property. Permanent protection can only be achieved via a fee simple or conservation easement dedication to a public agency. Permanent protection of all areas outside of the proposed and existing disturbance footprints is essential assure that no further development of the property occurs.

Any areas that are no longer part of the active mining operation must be required to be rehabilitated to as close to natural conditions as possible and remain permanently free of all fencing and wildlife movement barriers.

The Conservancy recommends that any new project approvals include the requirement for a large bond or endowment to absolutely insure that sufficient funds will be available to adequately rehabilitate the site at the expiration of the mining operation. Such a requirement must be adjusted for inflation to guarantee adequate reclamation.

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Please address any questions or future correspondence to Paul Edelman by phone at (310) 589-3200 ext. 128, at the above letterhead address, or by email at [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov).

Sincerely,

IRMA MUÑOZ  
Chairperson