



MOUNTAINS RECREATION & CONSERVATION AUTHORITY
King Gillette Ranch
26800 Mulholland Highway
Calabasas, California 91302
PHONE (818) 878-0886

August 12, 2025

Thomas Chaffee, Senior Planner
Ventura County Planning Division
800 South Victoria Avenue, L #1740
Ventura, California 93009

Pacific Rock Quarry (LU10-0003) Expansion Footprint Must be Reduced

Dear Mr. Chaffee:

The Mountains Recreation and Conservation Authority (MRCA) provides the following comments regarding the Pacific Rock Quarry Expansion Project (LU10-0003) and its Final Environmental Impact Report (FEIR). Before the County can proceed to either approve the Project, or to certify the FEIR, several serious errors of fact and omission require additional analysis. Most importantly, the FEIR is deficient for failing to protect adequate open space, because as proposed, the Project would permanently degrade both the western Santa Monica Mountains ecosystem and the inter-mountain range wildlife corridor known as the Santa Monica – Sierra Madre Connection that was published in 2006 with contributing authorship from Paul Beier. The attached, detailed exhibits show how the County must, and can, reduce the proposed Project expansion footprint to provide an adequate contribution of onsite wildlife corridor width and to conserve critical habitat of documented protected species.

Staff Report and FEIR fail to identify Project location within the Santa Monica – Sierra Madre Connection

There is no mention of the Santa Monica – Sierra Madre Connection (Connection) in the Staff Report which indicates a failure to describe the importance of the Project's location at a critical chokepoint for regional wildlife connectivity. The FEIR includes multiple instances of the same error of fact referring to the Project location as either not in the Connection or misrepresenting the South Coast Missing Linkages Project analysis that produced the Connection by conflating the least cost corridor for mountain lion permeability with a single location approximately 17 miles east of the Project.

FEIR Appendix J, Section 3.5 – Biological Resources Errata, presents a mark-up version (underline for additions, strikethrough for subtractions) of Section 3.5.1.4 (Habitat Connectivity and Wildlife Corridors) where the County states that the “Santa Monica – Sierra Madre Connection (Connection) ... stretches from the Santa Monica Mountains at the coast inland to the jagged peaks of the Santa Susana Mountains and the Sierra Madre Ranges of Los Padres National Forest within a corridor that is located approximately 17 miles east of the Project site.” This added, underlined text falsely suggests the Project is not within the Connection and that the entire Connection has a single crossing point

into/out of the Santa Monica Mountains located approximately 17 miles east of the Project.

While discussing impacts to California Endangered Species Act (CESA) protected mountain lion, the FEIR Appendix J, Section 3.5 – Biological Resources Errata, states on page 3.5-63: “Potential impacts associated with the Project’s reduction of the open space Santa Monica – Sierra Madre Connection wildlife movement corridor adjacent to the Project site are discussed in Impact BIO-7, below.” By striking reference to the Project’s location within the Connection and the County’s wordplay to minimize the Project’s impacts to the Connection’s western branch as shown in the attached Vicinity Map and the Santa Monica – Sierra Madre Connection: Figure 46 Linkage Design exhibit, these passages highlight how the County perpetuates an error of fact throughout the FEIR and Staff Report in order to conclude the Project’s mitigated impacts to biological resources are less than significant.

Similarly, supporting materials of the FEIR including Appendix C-5 Mountain Lion Technical Memorandum (C-5 Lion Memo) dated August 26, 2024, from ECORP Consulting, Inc., attempt to mislead the County and public with selective data-picking from the South Coast Missing Linkages Project’s Linkage Design for the Santa Monica-Sierra Madre Connection (Penrod, 2006). The C-5 Lion Memo presents Figure 1 Least Cost Corridor for Mountain Lion and Figure 2 Least Cost Union Additions and Subtractions as reproductions of the South Coast Missing Linkages Project’s Figures 10 and 13, respective. However, the C-5 Lion Memo appears to intentionally omit the comprehensive Figure 46 Linkage Design that shows the entirety of the Connection which, in fact, encompasses the Project location. Figure 46 Linkage Design from the South Coast Missing Linkages Project’s report is included for reference and clarity.

FEIR Chapter 2 – Comments and Responses perpetuates this error of fact in response to December 15, 2022, CDFW comments on page 2-154:

The commenter states that the Project is located within the “Santa Monica – Sierra Madre wildlife corridor overlay zone.” Although the [Partially Recirculated Draft Environmental Impact Report] discussed the Project as located within the Santa Monica – Sierra Madre Connection, FEIR Appendix C-5 ... and FEIR Biological Resources Errata (Appendix J) clarify that the Project is not located within the Santa Monica – Sierra Madre Connection, and that the connection is located approximately 17 miles to the east of the Project site.

County’s analysis as presented in the FEIR appears to intentionally obfuscate the importance of the Conejo Mountain – Tierra Rejada Valley habitat connectivity corridor to the overall success of the Connection. The FEIR shall remain deficient until the Project Description is corrected and the Project is fully evaluated for its impacts to the western branch of the Connection.

Substantiating the importance of the Conejo Mountain – Tierra Rejada Valley habitat corridor, the County adopted the Habitat Connectivity and Wildlife Corridor (HCWC) ordinance in 2019 that specifically included the Project site and surrounding hillsides that represent the western extent of the Santa Monica Mountains. The attached Vicinity Map shows the context of the Project within the Connection, the HCWC, and locations of County-identified wildlife crossing locations that support wildlife connectivity between the Santa Monica Mountains and the Sierra Madre Mountains. The Project is located at a critical bottleneck in the western Connection. Constricting this wildlife corridor will undermine multi-agency efforts to improve wildlife connectivity between the western Santa Monica Mountains, Tierra Rejada Valley, and the Sierra Madre Mountains.

The Project proposes to further fragment this western corridor despite ongoing California Department of Transportation (Caltrans) projects to improve wildlife connectivity across the 101 Freeway along the Conejo Grade. While the in-progress Annenberg Wildlife Crossing over the 101 Freeway at Liberty Canyon 15.5 miles to the east of the proposed Project will improve overall wildlife connectivity for the Connection, it is equally important to preserve diverse habitat approaches to the 101 Freeway at additional crossing locations to alleviate bottleneck pressures at the Liberty Canyon crossing. The National Park Service (NPS) mountain lion home range data from 2013 (C-5 Lion Memo, Figure 3) and mountain lion telemetry data from 2002 through 2013 (C-5 Lion Memo, Figure 4) further supports the need for additional crossing structures along the 101 Freeway in the western Santa Monica Mountains. The proposed expansion and 60-year operation of the Pacific Rock Quarry is incompatible with ongoing Caltrans, NPS, MRCA, and other stakeholder projects to improve wildlife permeability across the 101 Freeway and the County-established HCWC designed to protect and promote wildlife connectivity within this Connection. The attached Vicinity Map shows how the Project expansion will disrupt these multi-agency efforts to improve wildlife connectivity between County-identified Wildlife Crossing Structures specifically within the Connection.

The FEIR fails to analyze the Project's operation prior to the August 2017 Notice of Preparation (NOP) that impacts baseline conditions and/or operational impacts

In Appendix J, Section 3.5 – Biological Resources, page 3.5-2, includes the County statement that it will preferentially ignore October 2, 2017, comments from California Department of Fish and Wildlife (CDFW) identifying multiple instances where Project operations have impacted streams, sensitive species, and habitats beyond the existing CUP without proper noticing, permitting, or compensatory mitigation. The County asserts these non-compliance issues pre-date the NOP and “are not germane to the description of the environmental setting or the impact analysis.” The County claims “[t]his approach is consistent with CEQA and does not preclude the County or other [jurisdictional authorities] from investigating and taking appropriate actions” at a later date. However, Pacific Rock Quarry’s failure to notify CDFW of additional impacts related to the existing Conditional Use Permit (CUP) suggests the quarry operator also failed to provide written notification to the County Planning Director which would also be in violation of the CUP. Despite the County’s assertion otherwise, the nature, extent, and duration of these

potential violations is inherently germane to the description of the Project's environmental setting and impacts that the County is allegedly evaluating through this EIR process.

Without concurrent analysis of operational violations to streams, species, and habitat and impacts of the proposed Project expansion, the County effectively endorses the violation of CUPs for as long as operators can get away with it. The County's expressed disinterest creates a perverse incentive among other entities subject to CUPs—why comply when there is no punishment for non-compliance? Why would Wayne J. Sand & Gravel, Tapo Sand & Rock, CEMEX – Moorpark, or any other mining permit operator fully comply with their respective CUPs if Pacific Rock Quarry doesn't need to?

If prior violations were abated, did the required abatement measures include any Conservation Easements, Deed Restrictions, or other land preservation mechanisms that the Project is now attempting to incorporate as expanded mining area or mitigation area? Were only fines required?

The County's lack of comprehensive baseline analysis shows preferential treatment for a quarry operating outside of a County-designated Mineral Resources Protection Overlay zone with past violations that required state intervention due to the County's lack of enforcement actions. Without proper baseline analysis, the County may be absolving the Applicant of past violations without adequate remedy. The FEIR is deficient without the full context of violations, violation abatements, and concurrent analysis of the proposed Project expansion.

The FEIR also fails to analyze the portion of mining operations on APN 234-0-060-190 east of Howard Road along a drainage and potential riparian corridor draining to Conejo Creek. Per the Ventura County GIS viewer with 2024 aerial imagery, there appears to be approximately 15 acres of mining operations including material staging, equipment staging, and grading impacts not accounted for in the County's analysis. Comparing overhead aerial imagery available in Google Earth from October 17, 2023, to March 2, 2025, an area centered on the coordinates of 34.191782° North, -119.002853° West, appears to show upland erosional scours and a depositional fan structure down-gradient. The County's failure to include this 15-acre Pacific Rock Quarry operational area is another error of omission in the FEIR. Without comprehensive analysis of the Project's full scope and impacts to natural resources, the County's FEIR is incomplete and indicative of a piecemeal approval process.

The Project freeloards on existing preserved lands for a wildlife corridor

The FEIR contends the 800-foot-wide, off-site wildlife corridor exceeds the Beier (1995) *minimum* size requirements such that the Project can maximally expand eastward to within 50 feet of the property line. While the County FEIR analysis discussed edge-effect impacts to this 800-foot-wide corridor from adjacent neighborhood fuel modification and light spill and edge-effect impacts from expanded Project operations including light, noise, vibration, dust, trash, etc., the County concludes the Project's "mitigated" impacts will be

insignificant enough to permit maximal eastward expansion. As discussed above, MRCA disagrees with the County's selective data-picking resulting in errors of fact and omission. MRCA now turns attention to the Project's lack of fair share contribution to habitat connectivity and wildlife corridors.

As shown in the attached Minimum Onsite Wildlife Corridor Map, the proposed 6.77-acre area offered as a wildlife corridor preservation area is an inconsequential wedge of land that is conveniently—for the Applicant and Project—outside the proposed CUP boundary. This 6.77-acre wedge does nothing to functionally enhance or preserve wildlife corridor at its recognized chokepoint.

Alternately, the County must require the Project to incorporate the Beier (1995) minimum wildlife corridor width within the Project's property boundary. This modification removes only 5.93 acres from the Project's proposed expansion area and buffers both the wildlife corridor and the adjacent Dos Vientos neighborhood from the most proximal quarry operations—see attached Minimum Onsite Wildlife Corridor Map. Moving Beier's Minimum Corridor Design onto the Project site prevents the freeloader effect while requiring the Applicant to concede a minimal loss to the CUP extraction area. The County must require a metes and bounds description of an acceptable wildlife corridor to be recorded as a Conservation Easement. The most straightforward description of the Conservation Easement would use the dimensions of the Beier Minimum Corridor Design of 2,465-foot length by 328-foot width for an approximate 19.9-acre, onsite Wildlife Movement Corridor and Conservation Easement.

In order to prevent future piecemeal approvals of mining expansion, the areas of subject APNs 234-0-060-190 and 234-0-060-220 beyond the CUP boundary must be preserved with Conservation Easements held by a local, state, or federally authorized entity or transferred in fee interest to a public agency or land trust.

Mining Operations outside County-designated Mineral Resource Zone should be subject to increased scrutiny.

Per the County website for Mining Ordinance Update, the County has designated areas as Mineral Resources Protection Overlays (Mining Permit Operators Map, May 2025) to safeguard access to mineral resources, facilitate a long-term supply of mineral resources, minimize land use conflicts, and provide public notice about the presence of mineral resources, but not obligate the County to issue permits for development of mineral resources. Since Pacific Rock Quarry is not in a County-designated Mineral Resources Protection Overlay zone (a fact omitted in the FEIR but shown in the attached Vicinity Map for reference), the County has no obligation to approve the proposed Project nor should the County preferentially describe/analyze a proposed CUP modification requesting an additional 60 years when there are at least six other Mining Permit Operators within 12 to 18 miles operating within the County-designated zone. The attached Vicinity Map shows the Mineral Resources Protection Zones highlighted in

hashed magenta polygons and shows the Project location well outside the nearest Mineral Resource Zone but within the Santa Monica – Sierra Madre Connection.

County voters have regularly endorsed Save Open space and Agricultural Resources (SOAR) initiatives to protect open space and farmlands from conversion to increased development. The County has an obligation to justify how increased mining operations outside of County-designated Mineral Resource Protection area—from six to seven days a week, tripling the size of the mining area, and extending the life of the quarry to an additional 60 years—adjacent to agriculture and residential uses are compatible with SOAR initiatives. To be consistent and supportive of the County's Mining Ordinance and County-wide SOAR initiatives, future County needs for surface mining products must derive from those County-designated Mineral Resources Protection Overlay zones.

MRCA's attached Minimum Wildlife Corridor and Conservation Easement Alternative Map (Alternative Map) provides the County with a comprehensive exhibit to improve the Project. This Alternative Map shows how the Project can mitigate for impacts to habitat connectivity and wildlife corridors by incorporating the Beier Minimum Corridor Design within the subject property rather than freeloading on previously dedicated off-site open spaces. The Alternative Map also shows how the Project can dedicate the non-CUP areas of APNs 234-0-060-190 and 234-0-060-220 as Conservation Easement areas that will contribute to the protection of core habitat in the western Santa Monica Mountains as climate change and development pressures continue to cumulatively impact the Connection. Finally, the Alternative Map provides the County with the opportunity to appropriately buffer agricultural and residential developments to help implement the SOAR initiatives that are regularly supported by County voters.

Please address any questions or future correspondence to me by phone at (310) 589-3230, extension 128, by email at paul.edelman@mrca.ca.gov, or at the above letterhead address.

Sincerely,



Paul Edelman
Chief of Natural Resources and Planning

Attachments: Vicinity Map
 Santa Monica – Sierra Madre Connection: Figure 46 Linkage Design
 Onsite Wildlife Corridor Map
 Minimum Wildlife Corridor and Conservation Easement Alternative