

**From:** Michelle Danna <mdanna@cityofcamarillo.org>  
**Sent:** Friday, January 15, 2021 2:45 PM  
**To:** Bertoline, Justin <Justin.Bertoline@ventura.org>  
**Cc:** Greg Ramirez <gramirez@cityofcamarillo.org>; Joe Vacca <jvacca@cityofcamarillo.org>; Klotzle, Dave <dklotzle@cityofcamarillo.org>  
**Subject:** LU10-0003 | Pacific Rock DEIR | Comments From City of Camarillo

Good Afternoon, Justin.

Attached please find a letter from the City of Camarillo on the Pacific Rock Quarry Expansion, in response to the Notice of Availability of the Draft EIR for the project.

Thank you,  
Michelle

**Michelle Glueckert D'Anna**, Community Relations Officer  
[City of Camarillo](http://www.cityofcamarillo.org) | 601 Carmen Drive, Camarillo, CA 93010  
P (805) 388-5370 | F (805) 388-5388 | [mdanna@cityofcamarillo.org](mailto:mdanna@cityofcamarillo.org)

[We Are All In This Together!](#)

Las Personas son la Ciudad - The People are the City



**COVID-19 UPDATE:** Beginning Monday, December 14, 2020, Camarillo City Hall will close to walk-in traffic, and City services will be available online and over the phone only. City Hall business hours remain Monday through Friday from 8:00 a.m. to 5:00 p.m. For information about how to access services, please see the City's Frequently Asked Questions at [www.cityofcamarillo.org/covid19](http://www.cityofcamarillo.org/covid19). We thank you for your patience as we navigate this pandemic together, and for your understanding that these efforts are intended to minimize the spread of COVID-19.

Please note email correspondence with the City of Camarillo (and attachments, if any) are subject to the California Public Records Act which authorizes public disclosure (unless otherwise exempted from disclosure under the Act). The information contained in this email is intended only for the use of the named addressee(s). If you received this message in error, please notify the sender of its receipt by calling (805) 388-5300, and subsequently delete and/or destroy this document along with any attachments.



# City of Camarillo

601 Carmen Drive • P.O. Box 248 • Camarillo, CA 93011-0248

Office of the City Manager  
(805) 388-5307  
FAX (805) 388-5318

January 15, 2021

Justin Bertoline, Permit Planner  
Ventura County Government Center Administration Building - 3rd Floor  
Resource Management Agency - Planning Division  
800 S. Victoria Avenue  
Ventura, CA 93009

**SUBJECT: Draft EIR for Pacific Rock Quarry Expansion Project (Case No. LU10-0003)  
(SCH No. 2017081052)**

Dear Mr. Bertoline:

We appreciate the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the Pacific Rock Quarry Expansion Project proposed for the Quarry located at 1000 South Howard Road, just outside Camarillo city limits. We understand the project proposes to modify the Quarry's existing Conditional Use Permit (CUP) No. 3817-3 to: amend the current reclamation plan and to allow for the expansion of the existing mining area; extend the life of the permit for an additional 30-year period; extend the operational days from 6 to 7 days per week; allow construction and mobile mining equipment in outdoor storage areas; operate a concrete and asphalt recycling plant; allow for imported material to be used in reclamation fill; and replace an existing mobile home to be used as a 24-hour security trailer.

The City of Camarillo does not support the project, as proposed, and believes the DEIR is inadequate unless the revisions recommended in the City's comments below are adequately addressed.

## **AESTHETIC/VISUAL RESOURCE IMPACTS**

Comment: The DEIR concludes that the Project-specific aesthetic/visual resource impacts are significant and unavoidable. The DEIR should be revised to disclose that US 101, Lewis Road, and Pleasant Valley Road are designated scenic corridors and are identified as such in the City of Camarillo Community Design Element of the General Plan. The proposed expansion of the mining area will be visible from designated scenic corridors within the City of Camarillo, which is inconsistent with Section 10.9.2 - Scenic Corridor Design Guidelines, specifically with subsections 'c' and 'm,' which call for:

*"c. Existing native vegetation should be retained and enhanced to the greatest extent possible, except to provide proper sight distance," and*

*“m. Preserve distant views by discouraging development on ridge tops and encouraging landform grading.”*

The DEIR fails to acknowledge that the project will result in a significant impact related to the project’s inconsistency with the above-referenced scenic corridor design guidelines.

Recommendation: Include additional mitigation requiring the retention and enhancement of existing native vegetation and/or develop and approve a project alternative that discourages development of ridge tops and encourages landform grading.

## **NOISE**

Comment: The Camarillo Municipal Code (CMC), Chapter 10.34 – Noise Regulations, identifies that the allowable dBA for residential properties between 9:00pm and 7:00am is 45 dBA. The proposed expanded operational hours will allow for trucks to pass along Pleasant Valley Road adjacent to residential properties as early as 5:30am and as late as 10:00pm. The DEIR indicates that additional truck trips may occur in the times inside of 9:00pm and 7:00am which may subject residential properties to noise levels beyond the allowable dBA and create a nuisance and a significant adverse noise impact.

Recommendation: The City of Camarillo objects to the proposed expansion of the hours of operation and recommends the DEIR acknowledge this potentially significant noise impact and be revised to include a mitigation measure requiring that operations, including non-emergency truck trips, be restricted to 7:00am to 9:00pm, and prohibiting non-emergency operations on Sundays or holidays.

The DEIR also states that 24-hour Project operations can be authorized by the Director under special circumstances, such as emergencies. However, special circumstances are not specifically defined in the EIR. The EIR should be revised to include a definition of special circumstances, including the duration and frequency, and to analyze the potential noise impacts of operations under such special conditions.

The DEIR indicates impacts to noise will result in significant and unavoidable impacts because exceeds allowable dBA for residentially zoned properties; the DEIR should be revised to specifically identify that impact.

## **AIR QUALITY**

Comment: The DEIR section on Air Quality discusses the Airborne Toxic Control Measure (ATCM) adopted by CARB to limit heavy-duty diesel motor vehicle idling and reduce public exposure to diesel PM and other TACs (Title 13 California Code of Regulations [CCR], Section 2485), and identifies that diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered, must not to idle for more than five minutes at any given time. However, the DEIR does not contain a mitigation measure or recommended condition of approval requiring the Project to restrict vehicle idling to no more than 5 minutes to mitigate potentially significant adverse air quality impacts. The DEIR does contain mitigation for noise impact NV-1 prohibiting onsite excavation and reclamation equipment from idling for more than 30 minutes.

Recommendation: For consistency, revise the mitigation for air quality impacts to restrict vehicle idling to no more than five minutes, and further, modify proposed mitigation measure MM NV-1 to reduce the idling allowed for excavation and reclamation equipment to no more than five minutes. The DEIR should also be revised to analyze Air Quality impacts from mining operations and truck exhaust to Camarillo residents, in addition to the County aggregate.

## TRANSPORTATION

Comment: Regarding Section 3.9-Transportation and Circulation, and Appendix E-1, Transportation Impact Study, the Traffic Impact Study was completed by VRPA Technologies, Inc., and does acknowledge the City of Camarillo will tolerate brief periods of Level Of Service (LOS) "D" during the peak AM and PM traffic hours where improving to LOS "C" would be unreasonably costly. To further clarify, while the project may not be conditioned to construct mitigations, it must still pay Camarillo Traffic Impact Mitigation Fees (TIMF).

1. Adding the project to "Existing" conditions degrades the LOS on Pancho Road between Pleasant Valley Road and Calle Quetzal. The project degrades the LOS from "C" to "D" in the northbound AM peak period.
2. Adding the project to "Existing Plus Approved/Pending" conditions degrades the LOS on Pancho Road between Pleasant Valley Road and Calle Quetzal. The project degrades the LOS from "C" to "D" in the southbound PM peak period.
3. Adding the project to "Existing Plus Approved/Pending" conditions degrades the LOS on Pleasant Valley Road between Pancho Road and the US 101 Southbound Ramps. The project degrades the LOS "C" to "D" in the northbound AM peak.

In summary, while the DEIR may comply with SB 743 for the use of Vehicle Miles Traveled (VMT) as the methodology for analyzing traffic impacts; the project must nonetheless still pay the Camarillo TIMF.

If you have any questions about the comments contained within this letter, please contact Michelle Glueckert D'Anna, Community Relations Officer, at (805) 388-5370 or [mdanna@cityofcamarillo.org](mailto:mdanna@cityofcamarillo.org). We look forward to continued coordination with the County of Ventura throughout the processing of this project.

Sincerely,



Greg Ramirez  
City Manager