

From: Conejo Oak Tree Advocates <conejoaktreadvocates@gmail.com>

Date: January 15, 2021 at 4:16:27 PM PST

To: "Ward, Dave" <Dave.Ward@ventura.org>

Subject: Case No. LU10-0003 Pacific Rock Mine

Dear Mr. Ward,

Attached is a letter from Conejo Oak Tree Advocates in connection with the Environmental Impact Report for Pacific Rock Mine.

Thank you for incorporating our comments.

~Janet Miller Wall
for Conejo Oak Tree Advocates

CONEJO OAK TREE ADVOCATES

conejooaktreadvocates@gmail.com

January 12, 2021

Dave Ward, AICP, Director Ventura County Planning Division
County of Ventura Resource Management Agency
Planning Division
800 South Victoria Avenue
Ventura, CA 93009

Re: Pacific Rock Expansion, Case No. LU10-0003

Dear Mr. Ward,

Conejo Oak Tree Advocates is a local citizen group which advocates for the protection of California native trees, fauna and wildlife corridors located within valuable, undisturbed areas of our local community. The Pacific Rock Mine expansion project is just such an area.

Please consider our comments regarding the EIR for the mining expansion:

1. Coast Live Oak trees and California Black Walnut removals. The massive scale of the project over 30 years does not take into consideration impacts to trees that are not yet of protected size. An alternative should include a project that encompasses a time period of 5 or 10 years so that damage to the species is assessed regularly instead of destruction in one fell swoop.
2. Tree Mitigation Plan Is Inadequate: Oak and walnut tree mitigation is inadequate because it does not include Ventura County's Tree Protection Guidelines. In addition, a two year monitoring period is a very short period of time for native trees to be established and per the Public Resources Code should be extended to 7 years to ensure tree replacements survive.
3. PC-1 Laurel Sumac Scrub Plant Community. This area encompasses the largest region where blasting and construction will occur and contains the greatest number of rare species. In addition, the EIR notes the acreage has burned in several fires. Conejo Buckwheat/*Eriogonum crocatum* and endangered Verity's Dudleya mitigation may not be adequately addressed in the EIR if plants have not yet reestablished. A more current survey is necessary as is the locations where plant mitigation will occur.
4. Wildlife Corridor. Ventura County has adopted an ordinance to protect habitat connectivity and wildlife movement corridors for mountain lions and other species. The EIR does not adequately address impacts to this species on the project site.

Thank you for considering our recommendations.

Sincerely,

Gail Bianchino, Bonnie Clarfield-Bylin, Marilyn Carpenter, Tina Frugoli, Joan Edwards, Janet Wall and Silvana Zucca