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May 27, 2021

Dave Ward, Director, Planning Division  
Mindy Fogg, Manager, Commercial and Industrial Permits  
County of Ventura Resource Management Agency  
800 S. Victoria Avenue  
Ventura, CA 93009-1740

**RE: OPPOSE Ojai Quarry Reclamation Plan Amendment, Case No. PL18-0136**

Dear Mr. Ward and Ms. Fogg:

We have reviewed the staff report and associated Environmental Impact Report Addendum ("EIR Addendum") for the Ojai Quarry Reclamation Plan Amendment ("Amendment"). The Amendment seeks to eliminate the requirement in the existing Reclamation Plan to backfill an over-excavated area with 97,000 cubic yards of fill material. With the amendment, the over-excavated area would be left as-is and would be considered the new reclaimed surface. To support the Amendment, the Ventura County Planning Division has prepared a nine-page EIR Addendum.

The Ojai Quarry is located adjacent to national forest land inside the boundary of the Los Padres National Forest, and is visible along Highway 33, a National Forest Scenic Byway. Our organization participated extensively in the County's approval of the permit extension for this mine in 2016, securing the inclusion of a landscaping provision in the Conditions of Approval. We have recently communicated with County staff as it appears the landscaping is not in compliance with the terms and conditions of the mine's permit.

The County should not approve the subject Amendment until these ongoing permit violations are addressed.

In addition, the County should prepare a Subsequent EIR prior to approving the Amendment. The Amendment is a significant departure from the current Reclamation Plan. For context, the 97,000-cubic-yard over-excavated area is the equivalent of thirty Olympic-sized swimming pools. The potential visual, geologic, and water quality impacts should be fully vetted in a Subsequent EIR that is subject to public review and input along with a proper analysis of alternatives. As part of that process, the County should consult with the California Department of Fish & Wildlife and NOAA Fisheries on any potential impacts or supposed benefits of the Amendment to endangered southern

County of Ventura  
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Exhibit 12.a - Los Padres Forest  
Watch Letter

steelhead. A Subsequent EIR would also provide an opportunity to more thoroughly vet this Amendment for consistency with the County's General Plan.

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On a broader level, we are concerned with the precedent set by revoking a long-standing provision of the Reclamation Plan for this site without any apparent justification. The area should be fully reclaimed following the cessation of mining activities; it should not be allowed to remain permanently scarred with dangerously steep slopes and poor drainage. Moreover, we are concerned that such significant changes are being proposed to the Reclamation Plan just four years after the facility received a 30-year permit extension. This permit extension was also granted under an EIR Addendum. The last time a Subsequent EIR was prepared for this facility was in 1995.

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For the reasons outlined above, we urge you to deny the Amendment and direct the preparation of a Subsequent EIR. We also look forward to continuing to work with your staff to appropriately address the ongoing landscaping violations at this facility.

Best regards,



Jeff Kuyper  
Executive Director