ENVIRONMENTAL IMPACT REPORT (EIR) ADDENDUM
CEQA Guidelines Section 15164
July 7, 2022

A. BACKGROUND INFORMATION AND PROJECT DESCRIPTION:

1. Entitlement: A modified Conditional Use Permit (CUP) is requested to authorize the installation and operation of an industrial sand plant at an existing aggregate surface mining facility. (Case No. PL21-0112)

2. Applicant: CEMEX Construction Materials Pacific, LLC 3990 E. Concours Street, Suite 200 Ontario, C491764

3. Property Owner: CEMEX Construction Materials Pacific, LLC 3990 E. Concours Street, Suite 200 Ontario, CA91764

4. Location: The project site is located approximately four miles north of the City of Moorpark in unincorporated area of Ventura County. The facility address is 9035 Roseland Avenue, Moorpark, CA 93060.

5. Tax Assessor's Parcel Numbers: 500-0-060-1 55, 500-0-060-1 65, 500-0-1 00-250, 500-0-1 00-060, and 500-0-160-255

6. Lot Sizes, General Plan Land Use Designation, and Zoning Designation:

Table 1: Summary of Project Site Parcels

Parcel Number	Lot size (Acres)	Zoning	General Plan Designation
500-0-060-155	146.24	AE-40ac (Agricultural Exclusive, 40-acre minimum lot size) AE-4Oac/MRP (Agricultural Exclusive, 40-acre minimum lot size, Mineral Resources Protection Overlay)	Open Space
500-0-060-165	314.02	AE-40ac AE-4Oac/MRP	Open Space
500-0-1 00-250	430.28	OS-160ao/MRP (Open Space, 160-acre minimum lot size, Mineral Resource Protection Overlay)	Open Space
500-0-1 00-060	158.93	AE-4Oac/MRP	Open Space
500-0-1 60-255	119.85	OS-160ac/MRP	Open Space

7. Responsible and/or Trustee Agencies: California Department of Fish and Wildlife

County of Ventura
Planning Director Hearing
Case No. PL21-0112
Exhibit 4a - EIR Addendum

8. Project Description: *The existing permitted mining facility includes the use of various equipment necessary for the extraction and processing of mined materials and the operation of a Ready-Mix Concrete plant. The "Project Description" presented below constitutes the applicant's request. Any authorization granted by the County of Ventura will be limited to the conditions of approval imposed on a modified CUP.*

The Applicant requests that a modified CUP be granted to authorize the installation and operation of an industrial sand processing and packaging facility and ancillary facilities at the existing CEMEX Construction Materials Pacific, LLC (CEMEX) aggregate mining and processing facility. The proposed “sand plant” would be located within the current permit area and augment the other aggregate processing facilities currently permitted and in operation. The proposed plant would produce a variety of specialty sand mixes.

The proposed industrial sand plant would be located in the southeastern portion of the existing project site in an area historically used for material storage and be comprised of an industrial sand processing plant area and a product storage warehouse. The industrial sand processing plant would occupy an area approximately 82 feet by 108 feet (8856 square feet). The product storage warehouse would occupy an area approximately 459 feet by 175 feet (80,325 square feet). These two project components would be housed in a single building with a footprint of 98,769 square feet and a maximum height of 99 feet above grade.

At the future industrial sand plant, raw materials that are sourced primarily from the existing aggregate processing plant would be staged for processing in a material staging area adjacent to the new facility. The material would be loaded into the facility with a loader and/or a series of conveyors and/or bucket elevators to be dried, screened, and potentially mixed into various industrial sand products. Finished materials are then packaged or loaded directly into on-road haul trucks for market distribution.

Also proposed is the installation of ancillary facilities including an employee parking area, a material staging area, a load staging area, a liquified natural gas tank, a fire-suppression water tank, and a detention basin.

Grading would be required to prepare the site for construction of the sand plant and warehouse building and ancillary facilities. The project site has been previously disturbed by material stockpiling and other surface mining activities. Site runoff would be conveyed from the plant area to a new detention basin and to other existing detention basins on the site. An increase in runoff is not anticipated.

Water for plant operation and fire suppression would be supplied through the existing facility connection to Ventura County Waterworks District No. 1. Sewage disposal would be accomplished through the installation of a new onsite septic disposal system connected to restrooms within the proposed warehouse building.

The proposed project would not involve any change in the area where mining excavation and other surface mining activities are currently authorized and would not increase the rate at which mineral products are exported from the site. No changes in the hours of operation or the current limits on haul truck traffic are proposed.

B. STATEMENT OF ENVIRONMENTAL FINDINGS

On December 10, 1996, the Ventura County Board of Supervisors certified an EIR for the subject surface mining operation (then operated by Transit Mixed Concrete Company or "TMC") that evaluated the environmental impacts of a phased mining operation that would involve a 217-acre area and take place over a 50-year period. The mining operation was projected to produce 75-100 million cubic yards (44 to 59 million tons) of material with a maximum annual production rate of 3.4 million tons. The certified EIR identified significant impacts on biological and visual resources. The certified EIR also contained analysis on the proposed asphalt batch plant. Less than significant impacts from the batch plant related to noise, dust and odor were identified. While the batch plant was included in the EIR, it was later removed and not included in the approved conditional use permit. The proposed surface mining activities were projected to disturb 146 acres of native vegetation, which would result in the loss of nesting or breeding habitat for several native wildlife species. To mitigate these impacts, the mine operator was required to create and implement a comprehensive revegetation, habitat management, and compensation plan. The area disturbed by excavation conducted during Phases 2 and 3 of the mining plan would be visible to surrounding communities. Thus, various aesthetic enhancements were also required to be included in the reclamation plan to address these significant visual impacts. The certified EIR also identified significant air quality, noise, traffic and biological impacts and required mitigation to address these issues.

On October 9, 2017, the Ventura County Planning Director granted modified CUP PL16-0134 to authorize an expansion of the area in which surface mining activities are authorized. As part of this action, the Planning Director considered an addendum to the certified EIR (i.e. the “2017 Addendum”) as adequate to evaluate the impacts of the then-proposed mine expansion. The 2017 Addendum was incorporated at that time into the 1996 EIR. This combined document evaluates the environmental impacts of each component of the currently permitted facility. This new 2022 EIR addendum evaluates the potential environmental effects of the proposed industrial sand plan.

An addendum to a certified EIR satisfies the environmental review requirements of CEQA provided that none of the conditions set forth in CEQA Guidelines Section 15162 that require the preparation of a supplemental or subsequent EIR have been identified to result from a proposed project change. Sections 15162-15163 require the lead agency to prepare a supplemental or subsequent EIR if there are new significant environmental effects associated with the proposed project, or if the proposed project would increase the severity of previously identified significant environmental impacts, based on project changes, new information, or a change in circumstances under which the project is undertaken, that warrant major revisions to the previously certified EIR.

The conditions described in Section 15162 of the CEQA Guidelines which require the preparation of a subsequent EIR are stated verbatim below, along with a discussion as to why a subsequent EIR is not required to analyze the environmental impacts of the proposed changes in the mining facility (i.e. the CEQA “project”) that would be authorized by the requested modified CUP.

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects [Section 15162(a)(1)]

The proposed project does not involve any changes in the hours of operation, the character or location of mining excavation, or the current limits on material export and associated haul truck traffic. Thus, the potential impacts of the project are limited to the site-specific effects of sand plant construction and operation. The environmental issue areas relevant to the current proposal are discussed below.

Air Quality:

The proposed sand plant would be located at the approximate location of a previously planned asphalt batch plant that is not part of the approved facility. This asphalt plant was, however, evaluated for air pollutant emissions in the 1996 certified EIR. The estimated air emissions (GHG and criteria pollutants) from the proposed sand plant would be substantially less than was estimated for the asphalt batch plan as disclosed in the EIR according to the Air Quality report prepared by Sespe Consultants, that was reviewed and accepted by Ventura County Air Pollution Control District (VCAPCD).

Impacts on Air Quality were identified in the 1996 EIR as significant and unavoidable. The County decision-makers adopted a Statement of Overriding Considerations when the CEMEX (then Transit Mixed Company) project was approved in 1996. The proposed sand plant would not involve an increase in air pollutant emissions over the level disclosed in the certified EIR.

Fugitive dust would continue to be generated by the excavation of mineral material (sand) conveyed to and processed in the sand plant. This generation of dust is a continuation of the existing setting as no increase in the volume of material production is proposed. As the material sorting, packaging and loading operations would occur inside the proposed building, dust emissions from these operations would be minimal and less than the bulk export of unpackaged material that is currently trucked from the site.

Biological Resources:

The site of the proposed sand plant and ancillary facilities (employee parking area, load staging area, e.g.) are within the area authorized for surface mining activities. This area has been used for material storage and stockpiling. There are no trees or other substantial vegetation at this disturbed site. No substantial effects on biological resources are anticipated to result from facility installation or operation. Biology related mitigation measures (conservation easement, wildlife best management practices, avoidance of birds and protected species, e.g.) imposed from the 1996 EIR remain in effect. Moreover, the asphalt batch plant that was analyzed in the 1996 was determined to have no impact on biological resources as the location of the proposed facility is located on previously disturbed portion of the site. .

Noise:

Most noise generating processes associated with the proposed sand plant would occur inside the warehouse building and would not generate substantial noise discernible offsite at the nearest sensitive receptor (a residence) located about 1,000 feet to the southeast. The initial loading of material with heavy equipment would, however, occur outside of the building and be audible offsite. This noise would be consistent in volume and character with the existing and historic noise generated by the surface mining activities that are and have been authorized at the project site. To the extent that the proposed building would form an obstruction, an incremental decrease in noise transmission offsite would be anticipated. Note that noise from onsite mining operations, including noise generated from the operation of the asphalt plant, is not identified in the certified EIR as a potentially significant impact.

Hazards:

The adequate services currently available to the site would continue to be utilized. Water would continue to be provided by Ventura Waterworks District 1 access to the site would continue to be provided by local public roads and State Highway 23. All existing and proposed access roadways are required to meet access requirements of the Ventura County Fire Protection District. The surface mining activities at the facility would continue to involve the clearing of vegetation over the excavation areas. Thus, little to no vegetation would be present in the areas. However, the project would be conditioned (Exhibit 5 – Condition 54) to require 100 feet of brush clearance around any permanent structure. Adequate fire response time to the site is available from the Fire Station located in the City of Moorpark. Storage of hazardous materials would continue to be permitted and monitored by the County of Ventura Environmental Health Division.

Visual Resources:

The existing CEMEX mining facility is located in a remote area in the foothills approximately 4 miles north of the City of Moorpark. The proposed sand plant would be installed near the southeastern edge of the area authorized for surface mining activities by CUP PL16-0134. Although most of the building (the sand plant) would be 44 feet in height, the conveyor and screen stack system used to process the raw materials would be housed in a portion of the building that is 99 feet in height. This portion of the building would be visible from offsite locations.

The visual impact of this structure on the three nearest public viewpoint is evaluated in the attached August 30, 2021, Visual Resources Memorandum prepared by Sespe Consultants. These viewpoints are described in the following table.

Table 1 – Viewpoints Analyzed

Map Reference #	Approx. distance from proposed sand plant site (Miles)	Description
1	0.4	Viewpoint is located along Happy Camp Road, near the peak of the hill ridge to the southeast of the Project site. This location represents the closest publicly accessible portion of Happy Camp Road, as the remainder of the road extending northward is private (as classified by the County Assessor).
2	0.6	Viewpoint is located along the Happy Camp Canyon Fire Road to the east/southeast of the Project site. This location is part of the Happy Camp Canyon Trail public hiking trail.
3	0.7	Viewpoint is located farther up/east along the Happy Camp Canyon Fire Road to the east of the Project site. This location is also part of the Happy Camp Canyon Trail public hiking trail.

As indicated in the visual simulations presented in the Visual Resources Memorandum, the proposed building would not be silhouetted against the sky or otherwise prominently visible from public viewpoints. Only a portion of the proposed building would be visible and would have a graded slope as a backdrop. The 1996 EIR identified that the expansion of the mining operations would result in a significant unavoidable impact on visual resources. As such, a statement of overriding considerations was adopted. Mitigation measures and conditions of approval required the approval of a reclamation plan which includes visual elements and an exterior lighting restriction. The project includes landscaping to be installed along the southeastern perimeter of the building site and the painting of the building in muted earth tones (Exhibit 5 – Conditions 96 and 97). Given the limited visibility, the distance to the nearest public viewpoint (more than 2,000 feet), the lack of silhouetting, the proposed landscaping, and the material color measures, a potentially significant impact on visual resources would not occur.

In summary, no aspect of the proposed project has been identified that involves new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Major revisions of the EIR are not required.

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects [Section 15162(a)(2)].

The circumstances under which the CEMEX mining facility operates have not substantially changed since the EIR was originally certified in 1996 and augmented with an addendum in 2017. There have been no new major developments approved or constructed in the vicinity of the CEMEX mining facility.

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Board of Supervisors certified the previous EIR, shows any of the following:

a. The project will have one or more significant effects not discussed in the previous EIR [Section 15162 (a)(3)(A)].

No new potentially significant effects have been identified that would result from implementation of the proposed project. No new information pertaining to the CEMEX mining facility as a whole has been identified as evidence of a new significant impact not disclosed in the certified EIR.

b. Significant effects previously examined will be substantially more severe than shown in the previous EIR [Section 15162(a)(3)(B)].

The certified EIR identified significant environmental impacts in the issue areas of biology, traffic, noise, and air quality. No aspect of the proposed project changes would result in substantially more severe impacts in any of these areas. Impacts on air quality, in fact, would be substantially less than is disclosed in the EIR.

c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative [Section 15162(a)(3)(C)].

No such mitigation measures or alternatives have been identified.

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative [Section 15162(a)(3)(D)].

No such mitigation measures or alternatives have been identified.

Therefore, based on the information provided above, there is no substantial evidence to warrant the preparation of a supplemental or subsequent EIR. The decision-making body shall consider this addendum to the certified EIR prior to making a decision on the project.

C. PUBLIC REVIEW:

Pursuant to the CEQA Guidelines section 15164(c), this addendum to the certified EIR does not need to be circulated for public review, and shall be included in, or attached to, the certified EIR.

Prepared by:

Justin Bertoline

Justin Bertoline, Senior Planner
Commercial and Industrial Permit Section
Ventura County Planning Division

Attachments:

1. Project plans
2. August 30, 2021 Visual Resources Memorandum by Sespe Consultants
3. October 25, 2021 Ventura County Air Pollution Control District Memo

60 0 60 120
SCALE OF FEET

LEGEND

- CUP BOUNDARY PL16-0134
- LIMITS OF MINING BOUNDARY
- EXISTING CONTOURS, 2' INTERVALS
- TRAFFIC DIRECTION ARROW
- UNPAVED ALL-WEATHER ACCESS SURFACE SHOWN IN INDUSTRIAL SAND PLANT AREA TO HIGHLIGHT TRAFFIC FLOW

- FOR CONCEPTUAL FIREWATER SYSTEM, SEE PRELIMINARY DESIGN REPORT, INITIAL STUDY OF DO
- FOR SITE DRAINAGE IN INDUSTRIAL SITE PLAN AREA, SEE DRAINAGE STUDY (SESPE, 2021)

(E) EXISTING FACILITIES
(P) PROPOSED FACILITIES

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Attachment 1 - Plans

TOPOGRAPHY PRODUCED BY: KENNEY AERIAL MAPPING, INC. MARCH 5, 2015. CALIFORNIA STATE PLANE, ZONE 5, NAD83 ELEVATIONS ARE NAVD88, U.S. SURVEY FEET.

DATE: AUGUST 2021

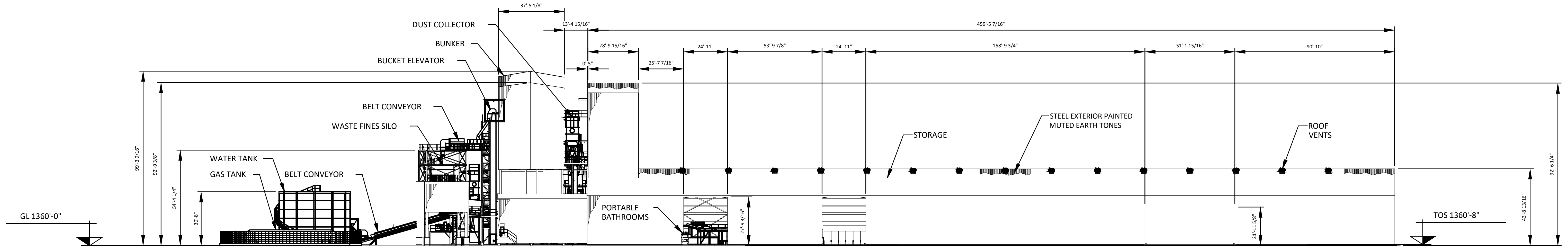
SESPE CONSULTING, INC.
A Trinity Consultants Company.
374 Poli Street, Suite 200 • Ventura, CA 93001
(805) 275-1515 • www.sespeconsulting.com

PROPOSED INDUSTRIAL SAND PLANT
CEMEX CONSTRUCTION MATERIALS
PACIFIC, LLC.
MOORPARK, CALIFORNIA

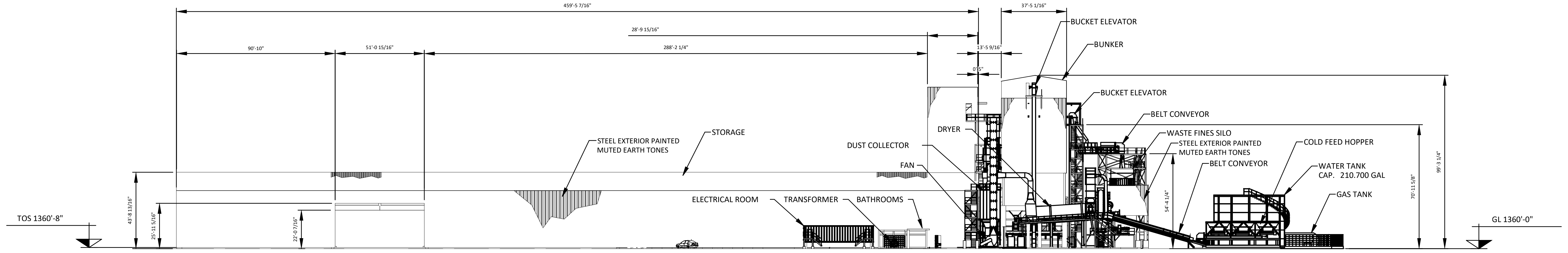
SCALE: HORIZ. AS SHOWN
VERT. AS SHOWN
DRAWN BY: G.CAMUS
CHECKED BY: DSM

FIGURE 5

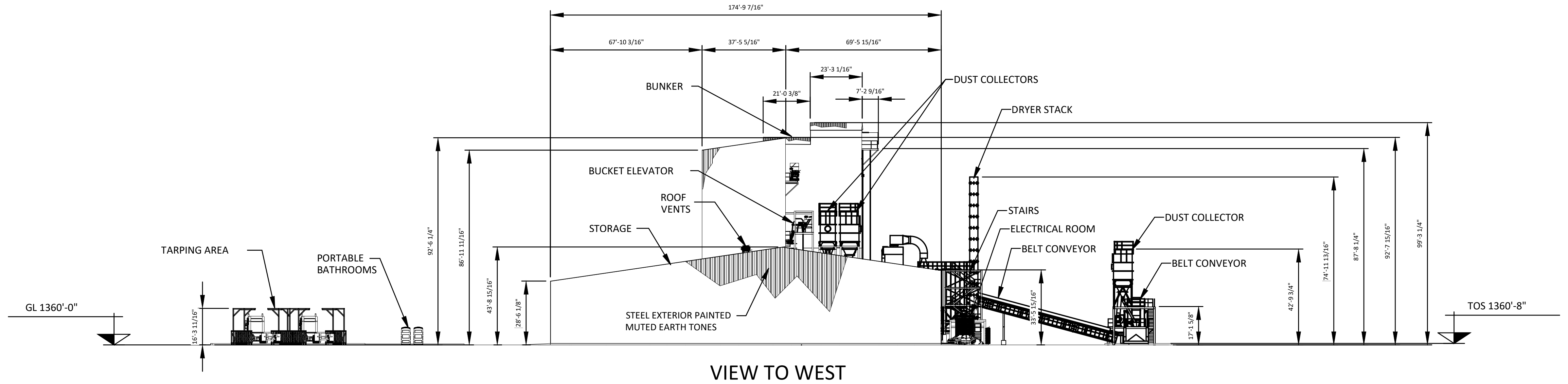
S:\CE01 – CEMEX\Moorpark CUP Compliance\Industrial Sand Plant Permitting_CAD_2021\CE01-10-01 Moorpark_Industrial-Sand-Plant_08-23-21.dwg Aug 25, 2021, 3:37pm GJC



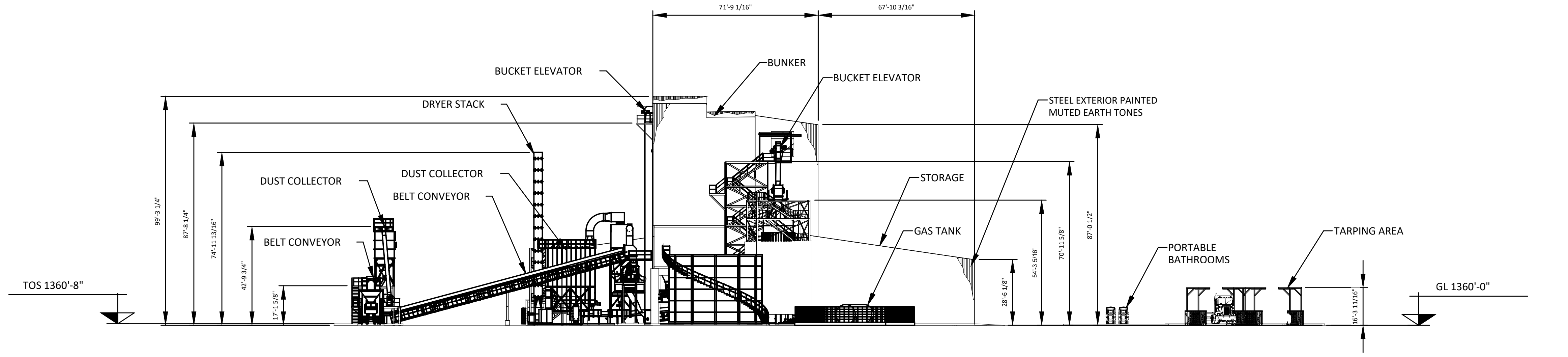
VIEW TO NORTH
SCALE: 1" = 40'-0"



VIEW TO SOUTH
SCALE: 1" = 40'-0"



VIEW TO WEST
SCALE: 1" = 40'-0"



VIEW TO EAST
SCALE: 1" = 40'-0"

NOTES:
1.- PRELIMINARY DRAWING
▥ STEEL CLADDING

REVISIONS

No.	DATE	DESCRIPTION	BY

DRAWING No.	TITLE	SUPPLIER
000-PV-001	SAND PLANT GENERAL LAYOUT	IECOS

REFERENCE DRAWING

PRELIMINARY
DRAWING IN PROCESS
USE ONLY AS REFERENCE

SUPPLIER

CHECKED
BY:
DATE:

APPROVED
BY:
DATE:

GLOBAL OPERATIONS & TECNICAL

CLIENT: CEMEX USA
PLANT: MOORPARK CA.
PROJECT No. _
NAME: SAND PLANT
TITLE:
SAND PLANT
ELEVATIONS

DRAWN:	A.F.V.A	DATE:	JUL–2021
CHECKED:	O.M.B.A	DATE:	JUL–2021
APPROVED:	O.M.B.A	DATE:	JUL–2021
ACOTS:	FEET/INCH	SCALE:	1"=40'–0"

THE CONTAINED INFORMATION IN THIS DRAWING IS PROPERTY OF CEMEX. IT MUST NOT BE REPRODUCED PARTIAL OR TOTALLY WITHOUT THE PRIOR WRITTEN PERMISSION OF CEMEX.

DRAWING No. 000–PV–002
REV.No. B

FILE: CE01–10–01 Moorpark_Elevations_08
PRINT DATE: 08/30/2021

INDUSTRIAL SAND PLANT ELEVATIONS
CEMEX CONSTRUCTION MATERIALS
PACIFIC LLC.
MOORPARK, CALIFORNIA

SCALE: HORIZ. AS SHOWN
VERT. AS SHOWN
DRAWN BY: -
DATE: AUGUST 2021

APPENDIX 7

LOCATION MAP
N.T.S.

DATE: JUNE 2021

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SITE LOCATION MAP
PROPOSED INDUSTRIAL SAND PLANT
CEMEX CONSTRUCTION MATERIALS, PACIFIC, LLC.
MOORPARK, CALIFORNIA

SCALE: HORIZ. AS SHOWN
VERT. AS SHOWN
DRAWN BY: G.CAMUS
CHECKED BY: DSM

FIGURE 1

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August 30, 2021

Ms. Christine Jones
CEMEX Construction Materials Pacific LLC
4120 Jurupa Street, Suite 202
Ontario, California 91761

Subject: **Visual Resources Memorandum – CEMEX Moorpark Proposed Industrial Sand Plant Installation**

This technical memorandum was prepared by Sespe Consulting, Inc. (Sespe) on behalf of CEMEX Construction Materials Pacific, LLC ("CEMEX") to identify and analyze potential impacts to visual resources associated with the proposed modification to CEMEX's existing aggregate mine and processing facility located in unincorporated Ventura County ("County"). CEMEX is proposing to install a new industrial sand plant in the southeastern portion of this facility. The installation and operation of the industrial sand plant is the "Project" under review. Figures 1 and 2 (Attachment 1) show the location of the proposed industrial sand plant.

This memorandum quantifies the potential impacts to aesthetic and visual resources associated with the proposed Project on nearby sensitive public viewpoints. Project visual impacts are presented and quantified utilizing visual simulations and the Visual Resources Management (VRM) System assessment developed and employed by the Bureau of Land Management (BLM), as well as applicable California Environmental Quality Act (CEQA) Appendix G Checklist criteria and Ventura County policies.

EXISTING CONDITIONS & PROPOSED PROJECT

CEMEX's existing aggregate mine and processing facility (PL16-0134) is located in the foothills approximately 4.0 miles north of the City of Moorpark, at the end of Roseland Avenue. Roseland Avenue is about 1.2 miles north of State Route 23 and is the private access road to the facility. The facility currently covers approximately 231 acres and has been in continuous operation (under various owners) as a surface mining and processing site since 1948. The facility is located in the low-lying foothills and is generally isolated and setback from nearby developed communities. Existing vegetation surrounding the Project site is generally classified as coastal sage scrub. There are few publicly accessible areas within the vicinity of the site other than Happy Camp Canyon Regional Park, which is located just east of the Project area. Figure 1 shows the Project site setting and surrounding areas.

As discussed above, CEMEX is proposing to install an industrial sand plant within the southeastern portion of the facility. As shown in Figures 1 and 2, the proposed location for the industrial sand plant is on a partially raised area within the footprint of CEMEX's existing facility. The proposed industrial sand plant site is just west of Happy Camp Road, which is a private residential roadway.

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Attachment 2 - Visual Resources Memo

The majority of the plant would be comprised of a large single-story (approximately 44-feet height) building used for material storage and truck loading/unloading; however, the western most portion of the building would house a taller conveyor system/horizontal screen stack. The highest northern portion of the building that would house the conveyors/screens would be the most visible portion of the proposed plant and is estimated to extend approximately 99-feet above the existing ground surface. Landscaping (i.e., trees, low-lying shrubs, etc.) would be planted along the southern/eastern boundaries of the plant site to provide some visual screening. Additionally, CEMEX would paint the plant structures using muted earth tones that would naturally blend with the adjacent hillsides. Please see Figure 2, which shows the design and layout of the proposed industrial plant building and associated landscaping.

NEARBY VIEWPOINTS & SCENIC VISTAS

Per the CEQA Guidelines Checklist and applicable County visual policies and requirements, discussed in greater detail below, the primary types of sensitive viewpoints selected for further assessment include public scenic vistas, nearby public roadways/scenic highways, and public parks/recreational facilities that are located within the Project viewshed. Table 1 and Figure 1 identify the three (3) viewpoints analyzed within this memorandum. These viewpoints are the closest public viewpoints to the Project site and conservatively account for potentially-affected views at locations farther from the Project site. The VRM located in Attachment 2 discusses how viewpoints are selected and the details of the analysis and simulations.

Table 1 – Selected Viewpoints Analyzed

Map Reference	Approx. Distance from Plant Site	Location Description
#1	0.4 miles	Viewpoint is located along Happy Camp Road, near the peak of the hill ridge to the southeast of the Project site. This location represents the closest publicly accessible portion of Happy Camp Road, as the remainder of the road extending northward is private (as classified by the County Assessor).
#2	0.6 miles	Viewpoint is located along the Happy Camp Canyon Fire Road to the east/southeast of the Project site. This location is part of the Happy Camp Canyon Trail public hiking trail.
#3	0.7 miles	Viewpoint is located farther up/east along the Happy Camp Canyon Fire Road to the east of the Project site. This location is also part of the Happy Camp Canyon Trail public hiking trail.

See Figure 1, which shows the displays the viewpoints assessed.

APPLICABLE REGULATIONS & VISUAL RATING CRITERIA

CEQA: The CEQA Guidelines include a set of criteria that should be evaluated for all applicable projects. Specifically, the CEQA Guidelines indicate that a Project will have a significant effect if any of the following are true:

a) *Have a substantial adverse effect on a scenic vista?*

b) *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

c) *In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

BLM: BLM has developed the VRM system to objectively rate the quality of visual resources and evaluate changes in scenic quality attributed to a proposed Project. The BLM system, which uses quantitative and qualitative methods to measure potential visual impacts, is based on the BLM visual impact assessment procedures provided in the "VRM Manual" Section 8400 (Bureau of Land Management, 1984). Using the BLM's system, overall visual quality is rated according to the presence and characteristics of seven (7) key components of the landscape, including landform, vegetation, water, color, adjacent scenery, scarcity and cultural modifications. The VRM system is discussed in detail in Attachment 2.

Although the Project has no Federal nexus, and the proposed industrial plant site and the surrounding lands are not located within the jurisdiction of the BLM, use of the VRM is considered appropriate as it allows visual resources and impacts to be subjectively quantified. By comparing the difference in visual quality ratings from the baseline ("before" condition) to post-project ("after" condition) visual conditions, the severity of project related visual impacts can be determined.

Ventura County: Ventura County, specifically the 2040 General Plan (Ventura County, 2020), has various policies related to conservation of visual resources as well as requirements for industrial developments within County lands. Please see Table 3 below for further discussion on specific Ventura County General Plan policies and their applicability to the Project.

CEQA IMPACT ANALYSIS

CEQA Appendix G Criteria a) – *Would the Project have a substantial adverse effect on a scenic vista?*

To address the CEQA Criteria a) described above, the BLM's rating criteria was utilized to rate visual impacts resulting from the Project at the three (3) specific viewpoints described in Table 1 above. Attachment 2 shows simulations that approximate how the finished Project buildings would appear from each viewpoint. Attachment 2 also displays the existing (i.e., baseline) site views and compares these to the simulated views of the Project. Comparing these before and after views, Table 2 below summarizes the expected change in visual quality at each location using the BLM's VRM criteria (also see Attachment 2 for additional detail).

Table 2 – BLM Visual Project Impacts at Nearby Viewpoints

Map Reference	Existing View Rating	Project View Rating	Change due to Project
#1	10	9	Minimal Decrease in Visual Quality
#2	10	10	No Change in Visual Quality
#3	10	9	Minimal Decrease in Visual Quality

Referring to the photo simulations/BLM VRM analysis, while the Project would be partially visible from Locations #1 and #3 assessed, and would therefore slightly alter views of CEMEX's facility/the surrounding landscape compared to what currently exists today (i.e., baseline), these changes are minor in nature. A relatively small portion of the top of the Project's conveyor/screen stack is expected to be visible from these viewpoints (i.e., Locations #1 and #3), which would only slightly change the "cultural modifications" component of the visual quality rating criteria, which takes into account any man-made modifications to the landform, water, vegetation, and/or the addition of man-made structures. However, the existing natural landscapes and surrounding visual resources (e.g., topography, vegetation, skyline, etc.) would remain the dominant visual features in these nearby locations, and installation of the Project is not expected to result in a significant visual/aesthetic impact. Furthermore, as shown in the simulations, the plant structures would be painted using muted earth tones that would naturally blend in with the adjacent hillsides, and landscaping consisting of larger trees as well as low-lying shrubs would be planted along the Project site boundary to further help obscure views from the east (see Figure 2). For these reasons, the Project would not have a substantial adverse effect on scenic vistas and public viewpoints surrounding the CEMEX facility.

CEQA Appendix G Criteria b) – *Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

The State of California, specifically the California Department of Transportation (Caltrans), officially designates State scenic highways through the "California Scenic Highway Program," which is managed by Caltrans. A list of existing State scenic highways can be found in Street and Highway Code, Section 263 (Caltrans, 2008). No candidate or designated State scenic highways are located within the immediate vicinity of the proposed industrial plant site. The closest State scenic highway is State Route 118 located approximately 3.2 miles away to the southeast, which is an "Eligible State Scenic Highways – Not Officially Designated." Due to the large distance and intervening topography between State Route 118 and the Project site, the Project would not be visible from State Route 118. Therefore, the Project would not substantially damage scenic resources within a State scenic highway and there are no impacts.

CEQA Appendix G Criteria c) – *In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

The Project site is located within a relatively urbanized area of Ventura County, and therefore zoning and other applicable regulations governing scenic quality were reviewed. Specifically, scenic/visual policies outlined in the County 2040 General Plan (Ventura County, 2020) were reviewed to determine applicability and whether the Project is consistent with the County policies and goals. A summary of the Project's consistency with the applicable County policies is presented in Table 3 below. Non-applicable policies, specifically those that are considered to be the sole domain of the County for implementation or those that, by virtue of the Project characteristics and location, do not relate to the policy, were excluded from this discussion.

Table 3 – Ventura County General Plan – Consistency Discussion

County Policy	Consistency Analysis
Chapter 2 – Land Use and Community Character Element	
Policy LU-16.10 – Visual Access for Rural Development: The County shall encourage discretionary development in rural areas to maintain views of hillsides, beaches, forests, creeks, and other distinctive natural areas through building orientation, height, and bulk.	As shown in Attachment 2, the Project structures have been oriented to minimize visual impacts and maintain existing public views of the surrounding hillsides. Specifically, the tower housing the conveyor/screen stack, which is the tallest structure, would be setback from the closest site boundary where the adjacent hillsides would help obscure it from nearby public viewpoints. Additionally, the Project would employ design features (e.g., painting with natural/earth tones, landscape screening, downcast lighting, etc.) that would help the structure blend in with the surrounding natural landscape. As such, the Project, as designed, is consistent with this policy.
Chapter 6 – Conservation and Open Space Element	
Policy COS-3.1 – Scenic Roadways: The County shall protect the visual character of scenic resources visible from state or County designated scenic roadways.	As discussed above, the Project would not impact scenic roadways. The closest designated scenic highway is State Route 118 (approximately 3.2 miles away), and the Project building(s) would not be visible from this location. Therefore, the Project is consistent with this policy.
Policy COS-3.2 – Tree Canopy: The County shall encourage the planting of trees and the protection of existing urban forests and native woodlands, savannahs, and tree canopy throughout the county, including along State or County designated scenic roadways and in residential and commercial zones throughout the county, especially those located within designated disadvantaged communities.	The Project would be constructed in a cleared, previously disturbed mining area, and no existing trees would be removed to accommodate the new structures. Conversely, CEMEX is proposing to plant numerous trees and low-lying shrubs along the east boundary of the Project (see Figure 2), which would act as a landscape visual buffer. As such, the Project, as designed, is consistent with this policy.
Policy COS-3.6 – Open Space Character: The County shall require discretionary development outside of Existing Communities be planned and designed to maintain the scenic open space character of the surrounding area, including view corridors from highways. Discretionary development should integrate design, construction, and maintenance techniques that minimize the visibility of structures from public viewing locations within scenic vistas.	See response to Policy LU 16.10 above. As shown in Attachment 2, the Project structures have been oriented and designed to minimize visual impacts and maintain existing public views of the surrounding hillsides, view corridors, and nearby scenic vistas, to the extent feasible. As such, the Project, as designed, is consistent with this policy.

County Policy	Consistency Analysis
Policy COS-6.5 – Mineral Resource Land Use Compatibility: The County shall ensure that discretionary development is compatible with mineral resources extraction and processing if the development is to be located in areas identified on the Mineral Resource Zone Maps prepared by the California State Geologist or in County identified mineral resource areas. The County shall: 2. Require discretionary development proposed to be located adjacent to existing mining operations to provide a buffer between the development and mining operations to minimize land use incompatibility and avoid nuisance complaints. 3. Establish a buffer distance based on an evaluation of noise, community character, compatibility, scenic resources, drainage, operating conditions, biological resources, topography, lighting, traffic, operating hours, and air quality.	As discussed above and shown in Attachment 2, the Project building(s) would be oriented and designed to minimize visual impacts, to the extent feasible. The largest structures (i.e., conveyor/screen stack) would be setback from the facility boundary to reduce its visibility. Additionally, landscaping would be planted along the eastern boundary of the Project site and would act as a visual buffer for public viewpoints located farther east (i.e., Happy Camp Road/Happy Camp Regional Park). For these reasons, the Project is consistent with this policy.

As outlined in Table 3 above, the Project would not conflict with any applicable Ventura County polices or ordinances governing scenic quality or protection of natural features. Project design features, specifically repainting the structures using natural muted earth tones, and planting of landscaping to act as a visual buffer, would sufficiently protect existing visual resources and ensure the Project is compatible with applicable County policies.

Per the discussion above, the Project would not substantially degrade the existing visual character of the Project site or surrounding areas, nor would it conflict with any applicable policies or plans meant to protect scenic resources. Therefore, impacts are considered less than significant with no mitigation required.

CEQA Appendix G Criteria d) – *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

The issue of light and glare is typically associated with excessively bright nighttime lighting that crosses over property lines (i.e., "light trespass") and illuminates off-site yards or bedroom windows. It is also associated with the condition that occurs when excessive nighttime lighting creates a "skyglow" effect.

New nighttime lighting fixtures would be required at the Project site, primarily for safety and security purposes. However, the lighting fixtures would be minimal, small in size, and installed near ground-level. Project operations would occur primarily during daylight hours, but some operations may occur during nighttime hours (Monday – Saturday, 6:00 a.m. – 10:00 p.m.). For example, for operations during the time of year when daylight hours are shorter, some lighting would be required to provide a safe working environment. If required, light-emitting diode (LED) and/or cut-off fixtures (or equivalent International Dark-Sky Association [IDA]-approved fixtures) would be used instead of mercury-vapor fixtures for any required nighttime lighting. The lighting has been designed to confine illumination to the Project sites and/or to areas that do not include light-sensitive uses. Additionally, the design features incorporated into the Project to minimize potential visual impact, specifically the fact that new structures/towers would be painted in natural muted earth tones (a matted, non-glossy finish would be applied), would also minimize potential offsite impacts associated with glare or nighttime lighting.

By employing minimal nighttime lighting fixtures and utilizing the proposed lighting and design features (i.e., downcast LED lights), the Project would have a less than significant impact associated with light and glare with no mitigation required.

SUMMARY

Based upon review of the Project site and the analysis presented above, CEMEX's proposed installation of the industrial sand plant is not expected to adversely affect the visual quality of the surrounding publicly accessible areas. Through implementation of the design features described above, specifically painting the structures using muted/matted natural earth tones, installation of landscaping along the eastern boundary of the plant site to act as a visual buffer, and use of downcast/low-impact exterior lighting, the construction and operation of the new plant would not result in a significant impact to aesthetic/visual resources pursuant to CEQA.

Please review and consider the attached information and feel free to contact me or Doug Mason at (805) 275-1515 if you have any questions or require additional information.

Kind regards,

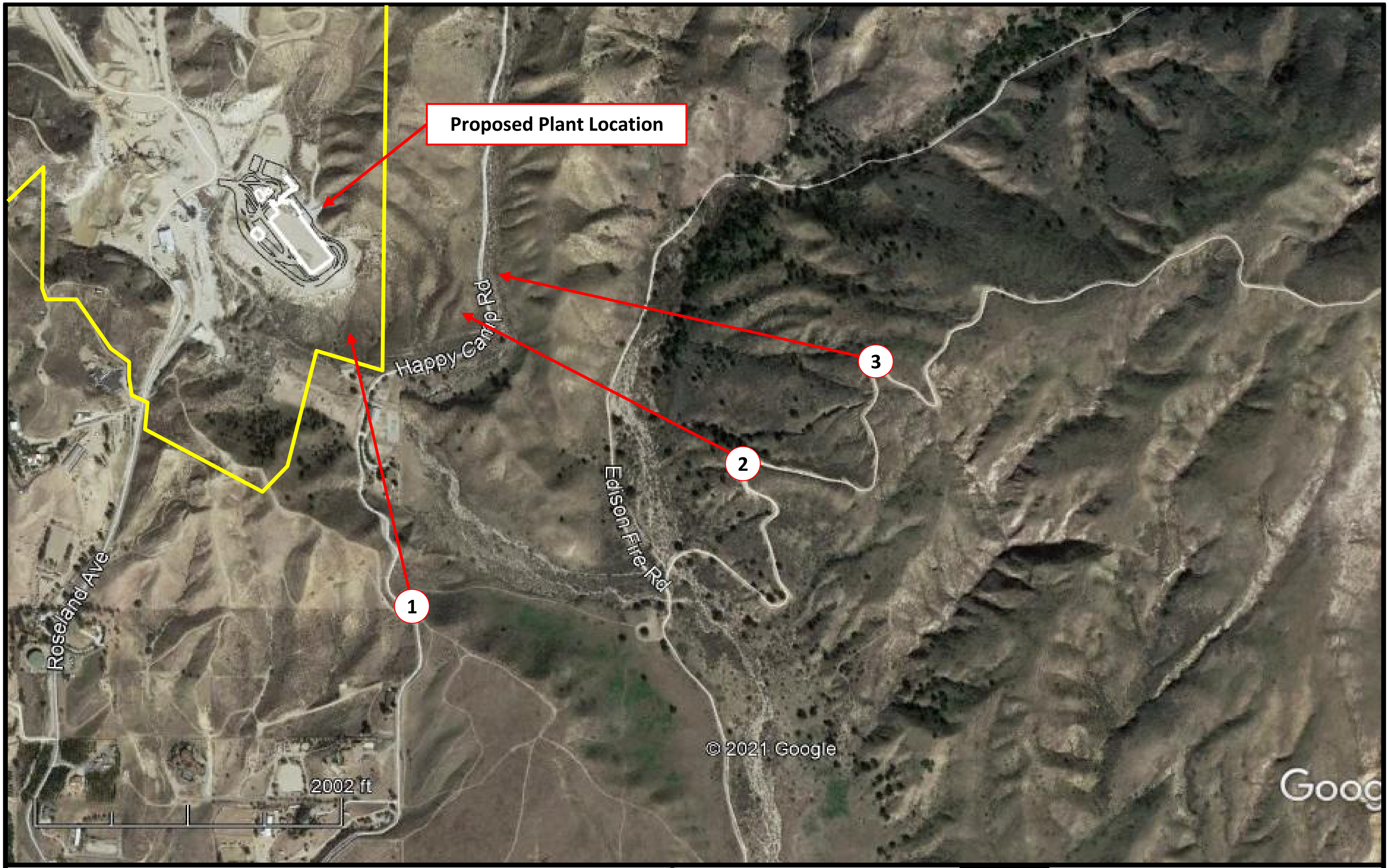
Graham Stephens
Sespe Consulting, Inc.

ATTACHMENTS

1. Figures
    - Viewpoint Location Map
    - CEMEX Plant Layout/Design
2. Visual Simulations & VRM Analysis
    - Viewshed Baseline Photos & Simulations
    - VRM Analysis – Viewpoint #1
    - VRM Analysis – Viewpoint #2
    - VRM Analysis – Viewpoint #3

ATTACHMENT 1

Figures



Source: Google Earth™ (2021)

🟨 Approximate County Permit Boundaries

Viewpoints Analyzed:

#1 - View from Happy Camp Road looking northwest.

#2 - View from Happy Camp Canyon Road looking northwest.

#3 - View from Happy Camp Canyon Road looking west.

N

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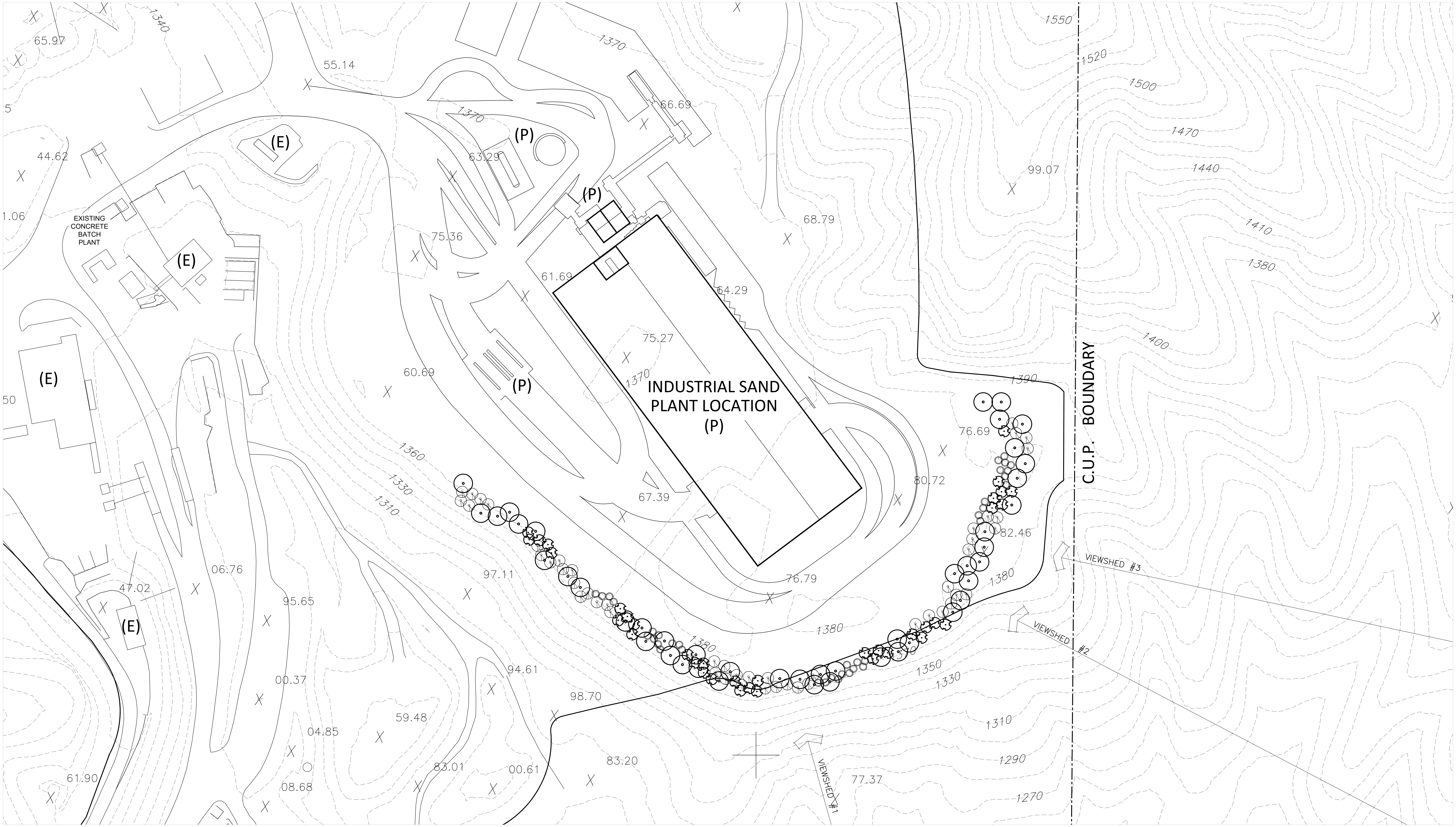
FIGURE	**VIEWPOINT LOCATION MAP** CEMEX Facility - Moorpark CUP PL16-0134 Ventura County, California		
1			
PROJECT #:	210509.0053	DATE:	8/30/21
SCALE:	N/A	DRAWN BY:	GPS



TREES/SHRUBS

PLANT LEGEND

SYMBOL	QTY.	SIZE	BOTANICAL NAME COMMON NAME	WUCOLS	SIZE
○	49	15 GAL.	HETEROMELES ARBUTIFOLIA TOYON	LOW	25 x 15'
◎	36	15 GAL.	RHAMNUS CALIFORNICA COFFEEBERRY	VERY LOW	6 x 15'
✿	36	15 GAL.	PRUNUS ILIICIFOLIA SSP. LYONII CATALINA CHERRY	LOW	15' x 25'
⊙	35	15 GAL. 15 GAL.	PROSOPIS GLANDULOSA OR CHILOPSIS LINEARIS	LOW LOW	30' X 25' 25' X 20'

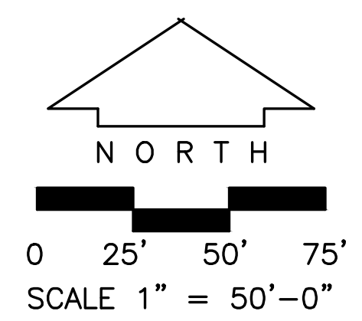
KEY

(P) -- PROPOSED FACILITIES

(E) -- EXISTING FACILITIES

NOT FOR BID

NOT FOR CONSTRUCTION



REVISIONS

NO.	DATE	BY	DESCRIPTION
1			

CLIENT
SESPE CONSULTING INC.
374 POLI ST. SUITE 200
VENTURA CA. 93001

PROJECT:
CEMEX MOORPARK
9035 ROSELAND AV.
MOORPARK CA.

SHEET TITLE:
CONCEPTUAL PLANTING PLAN

UNDERGROUND SERVICE ALERT
CALL BEFORE YOU DIG
CALL : TOLL FREE 1-800-227-2600
TWO WORKING DAYS BEFORE YOU DIG

JORDAN, GILBERT & BAIN
LANDSCAPE ARCHITECTS, INC.
459 NORTH VENTURA AVE., VENTURA CA 93001
(805) 642-3641 FAX (805) 653-7874

DRAWN:	MG
CHECKED:	MG
PRINTED FOR:	
PRELIM	8-09-21
BID	DATE
CONSTRUCTION	DATE

DRAWING
L1
SHEET 1 OF 1
PROJECT No. 21.02

ATTACHMENT 2

Visual Simulations & VRM Analysis

Viewshed Photos & Simulations

CEMEX Facility – Moorpark, California Augusts 9, 2021

VIEWPOINT #1

Viewpoint #1 – Existing photo from Happy Camp Road, southeast of the proposed plant site.

Viewpoint #1 – Simulated view from Happy Camp Road, southeast of the proposed plant site.

VIEWPOINT #2

Viewpoint #2 – Existing photo from Happy Camp Canyon Fire Road, east/southeast of the proposed plant site.

Viewpoint #2 – Simulated view from Happy Camp Canyon Fire Road east/southeast of the proposed plant site.

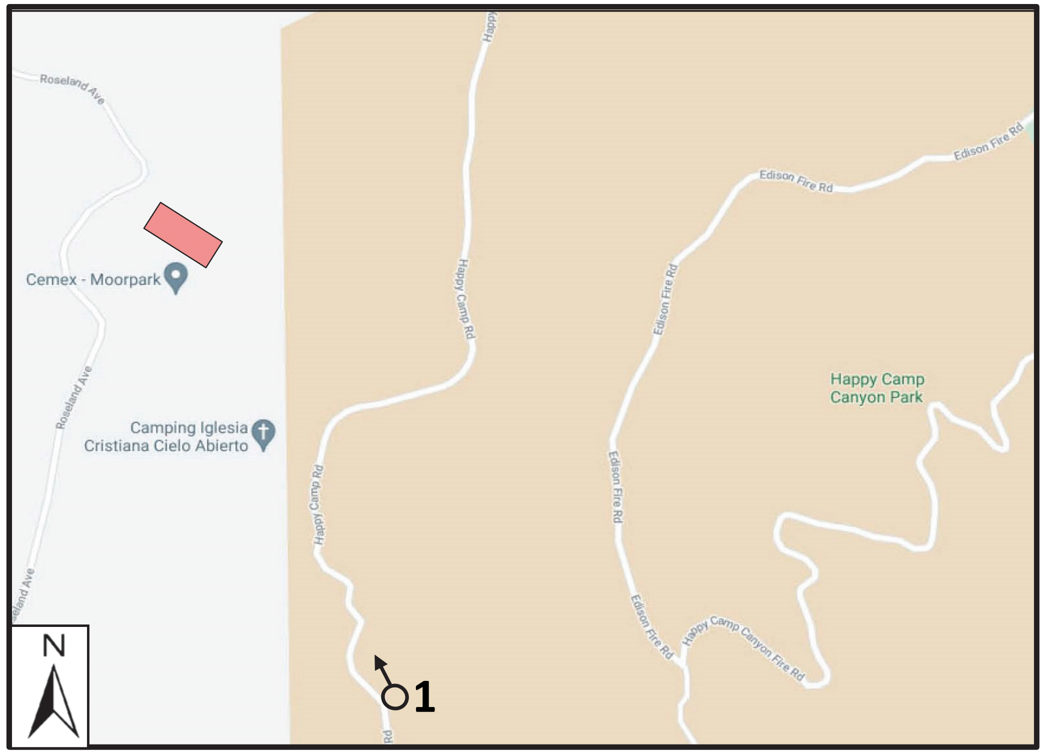
VIEWPOINT #3

Viewpoint #3 – Existing photo from farther up Happy Camp Canyon Fire Road, east of the proposed plant site.

Viewpoint #3 – Simulated view from farther up Happy Camp Canyon Fire Road, east of the proposed plant site.

Existing Views from Happy Camp Road

Key Factors	Ratings Criteria Score
Landform	2
Vegetation	3
Water	0
Color	2
Influence of Adjacent	2
Scarcity	1
Cultural Modifications	0
TOTAL	10



Simulated Views of Plant from Happy Camp Road

Key Factors	Ratings Criteria Score
Landform	2
Vegetation	3
Water	0
Color	2
Influence of Adjacent	2
Scarcity	1
Cultural Modifications	-1
TOTAL	9

Viewpoint #1 - Views from Happy Camp Road

Existing Views: At present, CEMEX's existing mining and processing operations are generally not visible from viewpoints along Happy Camp Road. As shown in the adjacent photo, the existing mining pits, processing plant(s), and ancillary operations, with the exception of the exposed excavation slope in the center of the photo, are shielded from view in this location due to intervening topography and vegetation.

Proposed Plant Views: As shown in the adjacent photo with the simulated views of the proposed industrial sand plant, the Project site and proposed plant structures would be barely visible from this location. The adjacent photo simulates the anticipated views of the Project site from this location along Happy Camp Road. As shown, only a small portion of the top of the industrial sand plant and associated loading/screening tower is expected to be visible from this location. Due to this very limited visibility, and because the processing plant structures would be painted using natural earth tones to match the surrounding landscape, the overall change to existing landscape are considered low. Based on the BLM's rating criteria, the Project is expected to result in a less than significant visual impact at this location.

Note: The rating system/scores shown above are based on the U.S. Bureau of Land Management's (BLM) Visual Resources Management (VRM) System.

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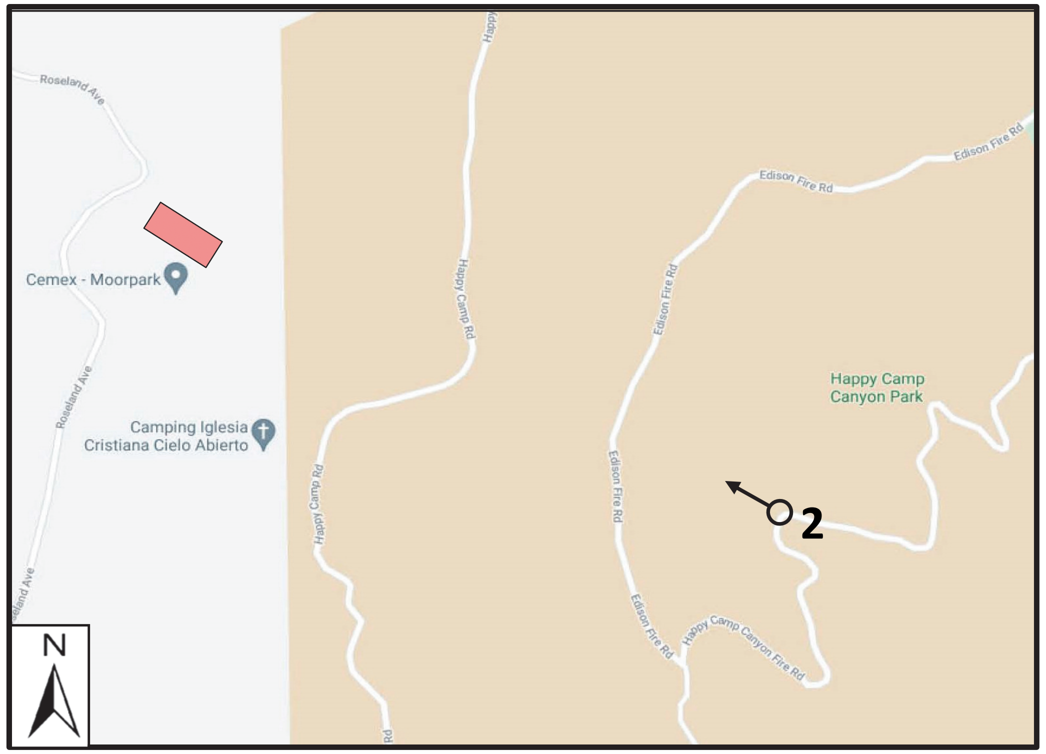
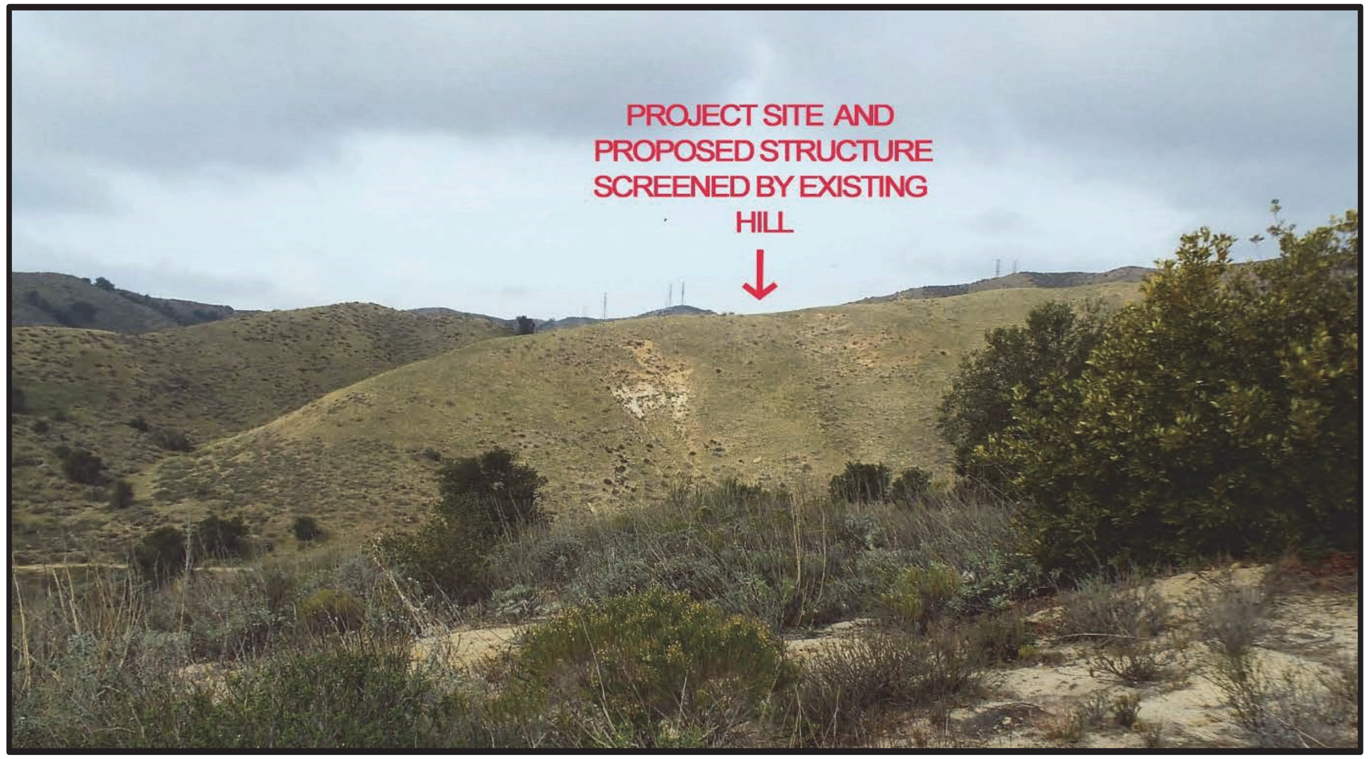
VIEWPOINT - LOCATION #1
CEMEX Facility - Moorpark
CUP PL16-0134
Ventura County, California

PROJECT #:	210509.0053	DATE:	8/30/21
SCALE:	N/A	DRAWN BY:	GPS

Existing Views from Happy Camp Canyon Fire Road

Key Factors	Ratings Criteria Score
Landform	2
Vegetation	3
Water	0
Color	2
Influence of Adjacent	2
Scarcity	1
Cultural Modifications	0
TOTAL	10





Simulated Views of Plant from Happy Camp Canyon Fire Road

Key Factors	Ratings Criteria Score
Landform	2
Vegetation	3
Water	0
Color	2
Influence of Adjacent	2
Scarcity	1
Cultural Modifications	0
TOTAL	10

Viewpoint #2 - Views from Happy Camp Canyon Fire Road

Existing Views: At present, CEMEX's existing mining and processing operations are not visible from viewpoints along Happy Camp Canyon Fire Road. As shown in the adjacent photo, the existing mining pits, processing plant(s), and ancillary operations, are completely shielded from view in this location due to intervening topography and vegetation.

Proposed Plant Views: As shown in the adjacent photo with the simulated views of the proposed industrial sand plant, the Project site and proposed plant building would not be visible from this location. The adjacent photo simulates the anticipated views of the Project site from this location along Happy Camp Canyon Fire Road (also the Happy Camp Canyon Trail public hiking trail) within the Happy Camp Regional Park. As shown, the intervening hill side is expected to completely obscure views of the proposed industrial sand plant and associated loading/screening tower from this location. Because the proposed industrial sand plant would not visible, based on the BLM's rating criteria the Project is expected to result in no visual impact at this location.

Note: The rating system/scores shown above are based on the U.S. Bureau of Land Management's (BLM) Visual Resources Management (VRM) System.

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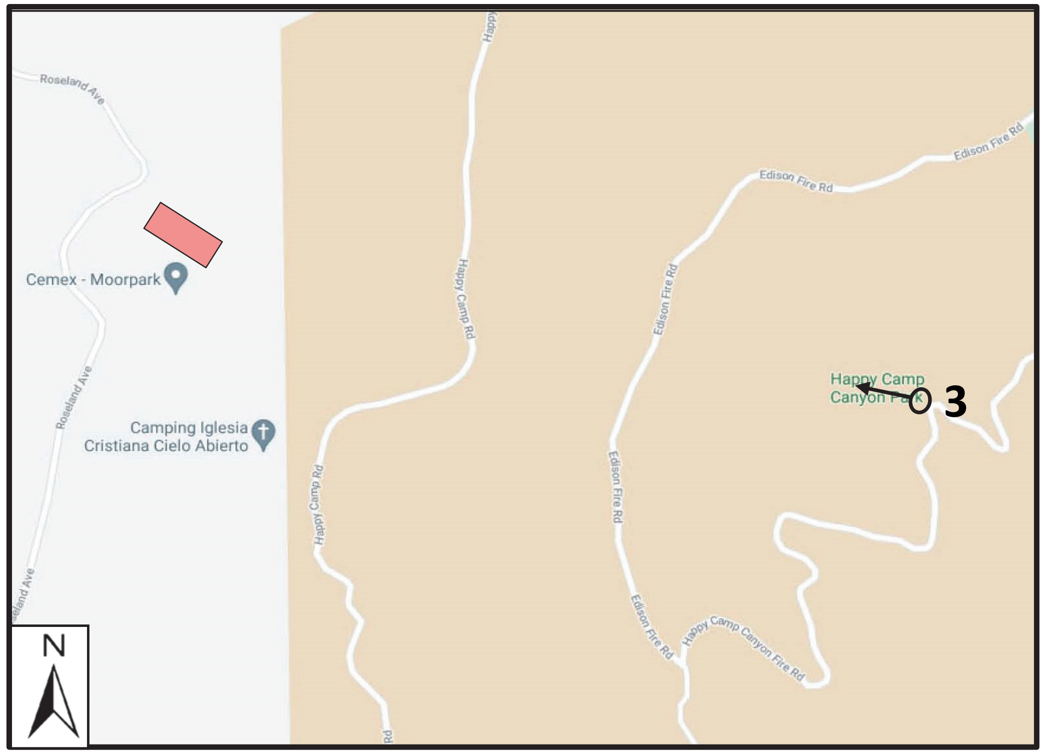
VIEWPOINT - LOCATION #2
CEMEX Facility - Moorpark
CUP PL16-0134
Ventura County, California

PROJECT #:	210509.0053	DATE:	8/30/21
SCALE:	N/A	DRAWN BY:	GPS

Existing Views from Happy Camp Canyon Fire Road

Key Factors	Ratings Criteria Score
Landform	2
Vegetation	3
Water	0
Color	2
Influence of Adjacent	2
Scarcity	1
Cultural Modifications	0
TOTAL	10



Simulated Views of Plant from Happy Camp Canyon Fire Road

Key Factors	Ratings Criteria Score
Landform	2
Vegetation	3
Water	0
Color	2
Influence of Adjacent	2
Scarcity	1
Cultural Modifications	-1
TOTAL	9

Viewpoint #3 - Views from Happy Camp Canyon Fire Road

Existing Views: At present, CEMEX's existing mining and processing operations are partially visible from viewpoints along Happy Camp Canyon Fire Road/within Happy Camp Regional Park. As shown in the adjacent photo, while the majority of the existing mining pits, processing plant(s), and ancillary operations are completely shielded from view in this location, some exposed excavation slopes are clearly visible.

Proposed Plant Views: As shown in the adjacent photo with the simulated views of the proposed industrial sand plant, the Project site and proposed plant building would be barely visible from this location. The adjacent photo simulates the anticipated views of the Project site from this location along Happy Camp Canyon Fire Road/Happy Camp Canyon Trail public hiking trail. As shown, only a very small portion of the top of the loading/conveyor tower is expected to be visible from this location. Due to this very limited visibility, and because the plant building would be painted using natural earth tones to match the surrounding landscape, and the overall change to existing landscape/visual quality in this area is considered very low. Based on the BLM's rating criteria, the Project is expected to result in a less than significant visual impact at this location.

Note: The rating system/scores shown above are based on the U.S. Bureau of Land Management's (BLM) Visual Resources Management (VRM) System.

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VIEWPOINT - LOCATION #3
CEMEX Facility - Moorpark
CUP PL16-0134
Ventura County, California

PROJECT #:	210509.0053	DATE:	8/30/21
SCALE:	N/A	DRAWN BY:	GPS

Ventura County Air Pollution Control District
4567 Telephone Rd
Ventura, California 93003
tel 805/303-4005
fax 805/456-7797
www.vcapcd.org
Dr. Laki Tisopulos, P.E.
Air Pollution Control Officer

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Justin Bertoline, County Planner DATE: October 25, 2021

FROM: Nicole Collazo, Air Quality Specialist

SUBJECT: Request for Review of PL21-0112

Air Pollution Control District (District) staff has reviewed the project application, which is a request that a modification to CUP PL16-0134 be granted to authorize the construction and operation of an industrial sand processing and packaging facility and ancillary facilities in addition to the existing activities authorized under CUP PL16-0134. The project location is 534 Old Baldwin Road in Ojai. The Lead Agency for the project is the County of Ventura.

The application is **COMPLETE** for the purposes of evaluating air quality-related and GHG impacts. The project's regional impact is **NO IMPACT**, local air quality is **LESS THAN SIGNIFICANT**, and GHG impacts are **NO IMPACT**. Attached are APCD's responses to Section 1 (Air) and Section 24 (Greenhouse Gases) of the Ventura County Initial Study Assessment Guidelines for the subject project. The following statements support each finding in Section 1 and Section 24.

ITEM 1(a): REGIONAL AIR QUALITY IMPACTS

Regional air quality impacts include estimating ozone precursor emissions in the ambient air generated from a specific project, as Ventura County remains in a non-attainment status for the State 1-hr and 8-hr ambient air quality standards for ozone and the Federal 8-hr ambient air quality standard for ozone. Reactive organic compounds (ROC) and nitrogen oxides (NO_x) are called ozone precursors because they create ground-level ozone when reacted with sunlight; ground-level ozone is commonly known as smog. The major sources of NOx in Ventura County are motor vehicles and other combustion processes. The major sources of ROC in Ventura County are cleaning and coating operations, petroleum production, and solvent evaporation. Long-term exposure of ground-level ozone can cause shortness of breath, nasal congestion, coughing, eye irritation, sore throat, headache, chest discomfort, breathing pain, throat dryness, wheezing, fatigue, and nausea. As a result, the Air Quality Assessment Guidelines (*AQAG*) was adopted by the APCD Board, initially in 1980, as a guidance document to address the reduction of pollutants such as ozone, particulate matter, and toxics from discretionary projects subject to CEQA review.

County of Ventura
Planning Director Hearing
Case No. PL21-0112
Attachment 3 - APCD Memo

Based on information provided by the applicant, **there will be no new impacts to regional air quality**, as indicated by the applicant's Air Quality and Climate Change Impact Assessment (AQCCIA) study submitted to the County. Regional impacts involve reviewing a project's air emissions against the APCD's adopted numerical thresholds of 25 lbs./day ROC and NOx. The emissions projected from the proposed sand processing & packaging facility is being compared to the similar asphalt batch plant analyzed in the 1996 EIR, which is proposed to be removed from the project and CUP (Project Description, Page 9). In addition, the project is not proposing an increase in the amount of material to be mined, daily average or maximum truck trips per day, employee maximum allowed, and days of operation. This analysis resulted in negative emissions, as the sand processing and packaging facility would have fewer air emissions as compared to the asphalt batch plant. An overview of both industrial plants' emissions, including on-road and off-road emissions is found below, taken from the AQCCIA.

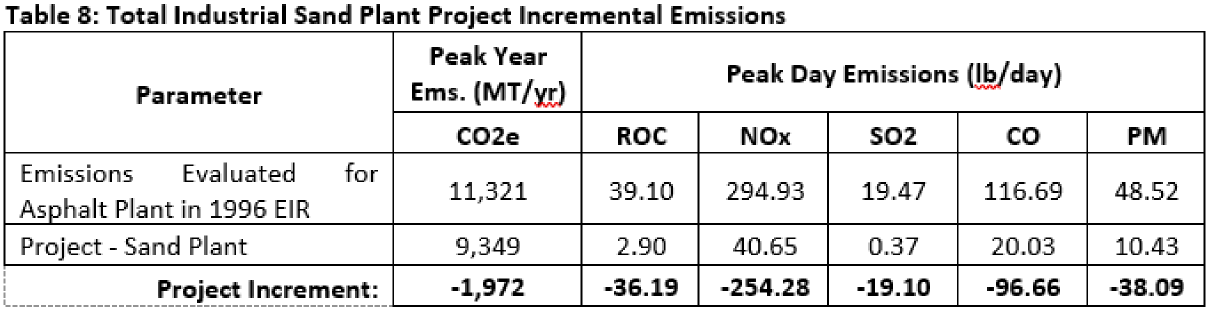

Table 8: Total Industrial Sand Plant Project Incremental Emissions

Parameter	Peak Year Ems. (MT/yr)	Peak Day Emissions (lb/day)				
	CO2e	ROC	NOx	SO2	CO	PM
Emissions Evaluated for Asphalt Plant in 1996 EIR	11,321	39.10	294.93	19.47	116.69	48.52
Project - Sand Plant	9,349	2.90	40.65	0.37	20.03	10.43
Project Increment:	**-1,972**	**-36.19**	**-254.28**	**-19.10**	**-96.66**	**-38.09**

PROPOSED STATIONARY PERMITTED EMISSIONS

In addition to the project's incremental emissions being lower than originally proposed, the portion of the project's emissions that are stationary and would require an APCD Permit to Operate are not counted against a numeral threshold for analyzing air quality impacts. The recently adopted Ventura County 2040 General Plan includes new policy HAZ-10.11 requiring the County to "consider total emissions from both stationary and mobile sources, as required by the California Environmental Quality Act" and to include APCD-permitted stationary source emissions in a CEQA air quality analysis of discretionary projects (i.e., CUP). The County Planning Division implements this policy by requiring, during CEQA review, quantification and disclosure of the project's estimated ozone precursor emissions from both mobile sources and stationary sources (including emissions that are subject to APCD's permitting and regulatory program), and discussion of the APCD permit(s) and regulations that would apply to and address project emissions. In accordance with the AQAGs, the County considers APCD's permitting and regulatory program to constitute mitigation under CEQA for air quality impacts associated with APCD-permitted emissions (i.e., emissions from equipment or operations requiring APCD permits). (See County Board Letter August 6, 2019, Page 21-22). Thus, in accordance with the AQAGs, APCD-permitted emissions are not to be counted toward APCD's significance thresholds of 25 pounds per day (AQAGs § 1.1, §5.4). The portion of the proposed project's air emissions needing APCD permits is **2.33 lbs./day ROC** and **16.13 lbs./day NOx** (AQCCIA, Table 10).

The facility has 2 different Permit to Operate with APCD, PTO Nos. 00030 (quarry operation) and 00031 (processing plants). The facility is subject to Best Available Control Technology (BACT), Rule 50, Opacity, Rule 51, Nuisance, Rule 55, Fugitive Dust, and Rule 10, Permits Required. The facility is also required to maintain monthly production records and perform testing such as quarterly moisture content analyses per ASTM Test Method C 566 and Part 60, Chapter 1, Title 40, Code of Federal Regulations, Subpart 000, Standards of Performance for Non-Metallic Mineral Processing Plants (opacity requirements to control fugitive emissions from processing equipment). In addition, routine maintenance is ensured through required logging of pressure gauges and other equipment on the processing plants such as, but not limited to, baghouses, hoppers, hoods, and screens. The permits also have conditions to comply with fugitive dust emissions, such as watering all road and work areas, covering truck and trailer bed loads, and cleaning the surface of all outgoing trucks.

The proposed industrial sand processing and packaging facility and related equipment will be required to be added to the existing APCD permit(s). A condition of approval will be recommended for the applicant to submit the necessary applications with APCD's Engineering Division and is found below.

Standard conditions of approval for dust control during construction activities is also recommended should the CUP be approved for the control of dust near sensitive receptors and found below. There will be proposed finished grading while using the on-site equipment as well as construction of ancillary facilities described.

PERMITS REQUIRED

Purpose: To ensure that project operations shall be conducted in compliance with all applicable VCAPCD Rules and Regulations, in particular Rule 10, (Permits Required), for certain types of new and modified equipment and operations that require APCD permits prior to installation.

Requirement: The Permittee shall obtain an Authority to Construct prior to installation and a Permit to Operate prior to operation. All APCD Permitting requirements shall be satisfied prior to any operations commencing onsite. To contact APCD Permitting, please contact the Engineering Division at 805-303-3688 or by email at engineering@vcapcd.org.

Documentation: An approved Authority to Construct and an approved Permit to Operate from APCD.

Timing: The Permittee shall submit the appropriate applications and supporting documentation to APCD for review and approval prior to beginning construction or installation or prior to beginning operation. The Permittee shall provide the Planning Division these APCD permits, or written confirmation from APCD that the permits are not needed, prior to the issuance of a Zoning Clearance for use inauguration and/or installation.

Monitoring and Reporting: A copy of both the approved Authority to Construct and a Permit to Operate shall be maintained as part of the project file. Ongoing compliance with the requirements of the Permit to Operate shall be accomplished through field inspection by APCD inspectors.

FUGITIVE DUST

Purpose: To ensure that fugitive dust and particulate matter that may result from site preparation and construction activities are minimized to the greatest extent feasible.

Requirement: The Permittee shall comply with the provisions of applicable VCAPCD Rules and Regulations, which include, but are not limited to, Rule 50 (Opacity), Rule 51 (Nuisance), and Rule 55 (Fugitive Dust).

Documentation: The Permittee shall ensure compliance with the following provisions:

I. The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust;
II. Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water should penetrate sufficiently to minimize fugitive dust during grading activities;
III. All trucks shall cover their loads as required by California Vehicle Code §23114.
IV. Fugitive dust throughout the site shall be controlled by the use of a watering truck or equivalent means (except during and immediately after rainfall). Water shall be applied to all unpaved roads, unpaved parking areas or staging areas, and active portions of the construction site. Environmentally safe dust control agents may be used in lieu of watering.
V. Graded and/or excavated inactive areas of the construction site shall be monitored at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days.
VI. Signs shall be posted onsite limiting traffic to 15 miles per hour or less.
VII. All clearing, grading, earth moving, or excavation activities shall cease during periods of high winds (i.e., wind speed sufficient to cause fugitive dust to be a nuisance or hazard to adjacent properties). During periods of high winds, all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by onsite activities and operations from being a nuisance or hazard, either offsite or onsite.

Timing: Throughout the grading and construction phases of the project.

Reporting and Monitoring: Construction and Grading permits are issued by Publics Works Agency and inspector shall perform periodic site inspections throughout the construction period. Monitoring and Enforcement of dust-related provisions shall also be conducted by APCD staff on a complaint-driven basis.

ITEM 1(b): LOCAL AIR QUALITY IMPACTS

Local air quality impacts for the review of discretionary projects may involve a qualitative analysis for project-generated emissions of dust, odors, carbon monoxide, and toxics, if applicable, that can affect the health and safety of any nearby sensitive receptors. Sensitive receptors are considered the young, the elderly, and those susceptible to respiratory diseases such as asthma and bronchitis. Sensitive receptors can be found in schools, playgrounds, hospitals, and elderly care facilities.

Residential areas can also be considered sensitive receptors, as some residents may reside in their homes for long periods of time. Based on information provided by the applicant, **the subject project will generate less than significant local air quality impacts**. A brief discussion is followed.

CARBON MONOXIDE

Some localized areas, such as traffic-congested intersections, can have elevated levels of CO concentrations (CO hotspots). CO hotspots are defined as locations where ambient CO concentrations exceed the State Ambient Air Quality Standards (20 ppm for 1-hr standard, 9 ppm for 8-hr standard). The Federal Ambient Air Quality Standard for CO is 35 ppm for 1-hr standard and 9 ppm for the 8-hr standard. In Ventura County, ambient air monitoring for CO stopped in 2004, with the approval of the U.S. Environmental Protection Agency- Region 9, because CO background concentrations in El Rio, Simi Valley, and Ojai were much lower than the State Ambient Air Quality Standard (highest recorded CO background concentration in Ventura County was in Simi Valley at 6.2 ppm for 1-hr, 1.6 ppm for 8-hr (*AQAG, Table 6-2*). Therefore, no CO hotspots are expected to occur in the Moorpark Non-Growth Area where the proposed project is located, and additional CO modeling analysis is not warranted. In addition, with over 80% of the CO in urban areas emitted by motor vehicles, and with stricter, cleaner emission standards to the mobile fleet, CO ambient concentrations should remain at or lower than the most recent CO monitoring data available for Ventura County.

AQMP CONSISTENCY

The proposed project must address consistency with the AQMP if estimated operational emissions exceed 2 lbs./day or greater for ROC or NOx, as described in the *AQAG, Section 4.2*. The proposed project's operational emissions do not exceed 2 lbs./day for either ozone precursor, as shown above under Regional Impacts, therefore, an AQMP consistency analysis is not required. The project would **not conflict or obstruct with implementation of the most recent AQMP adopted (Initial Study Item Checklist C. Air Quality, Item 1) and would have a less than significant impact.**

ODORS and DUST

The project is not expected to generate odorous emissions in such quantities as to be a nuisance to nearby land uses, as defined by APCD Rule 51, Nuisance and the California Health and Safety Code Section 41705. The facility may generate some odors due to the use of off-road equipment on-site, however it is not expected to increase drastically due to the project (addition of sand batch plant). APCD will recommend an additional condition of approval for compliance with complaint-driven rule, Rule 51, Nuisance, found below. Fugitive dust impacts are expected to also be less than significant. The facility will also have to comply with APCD Rule 55, Fugitive Dust, that will be enforced by APCD during annual compliance inspections for the APCD permits with the facility and on a complaint-driven basis and Rule 51 which is incorporated below as a condition of approval. The facility's existing and proposed equipment is equipped with water bars and sprays as well as having on-site water tanks and trucks that routinely maintain the stockpiles, conveyors, and processed material wet as confirmed by routine inspections that obtain the required quarterly moisture analyses.

NUISANCE

Purpose: To ensure that discharge of air contaminants (odor, dust, etc.) that may result from site operations are minimized to the greatest extent feasible.

Requirement: Permittee shall operate in accordance with the Rules and Regulations of the Ventura County Air Pollution Control District, with emphasis on Rule 51, Nuisance, stated below:

I. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endangers the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.

Documentation: No documentation is required for the purposes of this condition.

Timing: Throughout the life of the permit.

Reporting and Monitoring: Monitoring and enforcement of nuisance provision is enforceable by APCD on a complaint-driven basis.

ITEM 24: GREENHOUSE GASES

Greenhouse gases (GHG) are gases that trap heat in the atmosphere, including, but not limited to carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6). Water vapor, although it is a gas that traps heat, is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation. GHGs are emitted both naturally and anthropogenically (human-caused). Of these GHGs, CO2 and CH4 are emitted in the largest amounts from anthropogenic activities, such as the combustion of fossil fuel resources and organic processing and storage operations, respectively.

Neither APCD nor the County has adopted a threshold of significance applicable to Greenhouse Gas (GHG) emissions from projects subject to the County’s discretionary land use permitting authority. The County has, however, routinely applied a 10,000 metric tons carbon dioxide equivalent per year (MTCO2e/Yr) threshold of significance to industrial projects, in accordance with CEQA Guidelines Section 15064.4(a)(2). APCD has concurred with the County’s approach. APCD supports the application of this numeric threshold as stated in the GHG Threshold Report APCD published in 2011 at the request of the APCD Board, which concludes “Unless directed otherwise, District staff will continue to evaluate and develop suitable interim GHG threshold options for Ventura County with preference for GHG threshold consistency with the South Coast AQMD and the SCAG region”. The South Coast AQMD at the same time proposed an interim screening threshold of 3,000 MTCO2e/Yr for commercial/residential projects. Industrial projects or facilities are defined as stationary emission sources that have or are required to have an APCD Permit to Operate.

Based on information provided by the applicant, **there will be no new impacts to greenhouse gases** as indicated by the applicant's Air Quality and Climate Change Impact Assessment (AQCCIA) study submitted to the County. The emissions projected from the proposed sand processing & packaging facility is being compared to the similar asphalt batch plant analyzed in the 1996 EIR, which is proposed to be removed from the project and CUP (Project Description, Page 9). In addition, the project is not proposing an increase in the amount of material to be mined, daily average or maximum truck trips per day, employee maximum allowed, and days of operation. This analysis resulted in negative emissions, as the sand processing and packaging facility would have fewer air emissions as compared to the asphalt batch plant. An overview of both industrial plants' emissions, including on-road and off-road emissions is found below, taken from the AQCCIA.

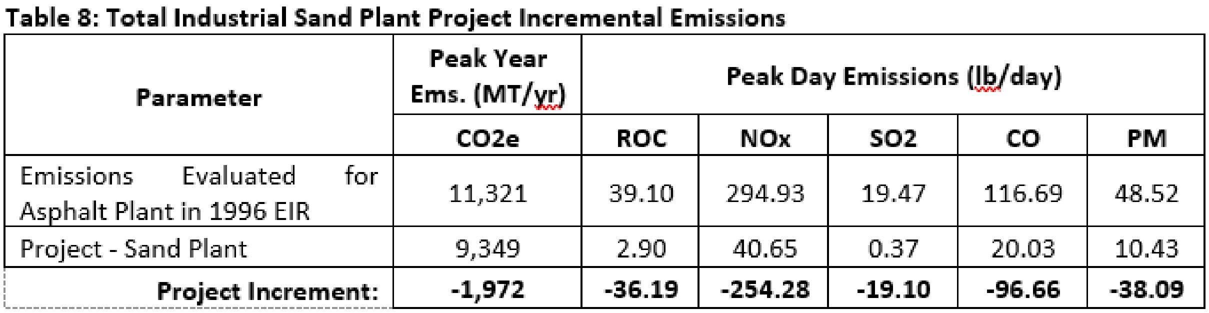

Table 8: Total Industrial Sand Plant Project Incremental Emissions

Parameter	Peak Year Ems. (MT/yr)	Peak Day Emissions (lb/day)				
	CO2e	ROC	NOx	SO2	CO	PM
Emissions Evaluated for Asphalt Plant in 1996 EIR	11,321	39.10	294.93	19.47	116.69	48.52
Project - Sand Plant	9,349	2.90	40.65	0.37	20.03	10.43
Project Increment:	**-1,972**	**-36.19**	**-254.28**	**-19.10**	**-96.66**	**-38.09**

Thank you for the opportunity to review this project. If you have any questions, you may reach me at nicole@vcapcd.org.