



California Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Office of Spill Prevention and Response
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Governor's Office of Planning & Research

December 04, 2020

Dec 07 2020

STATE CLEARINGHOUSE

Jaclyn Lee
City of Camarillo 601 Carmen Drive
Camarillo, CA 90040 jlee@cityofcamarillo.org

Subject: Camarillo Springs General Plan Amendment 2017-2, Draft Environmental Impact Report, SCH No. 2019070514, City of Camarillo, Ventura County

Dear Ms. Lee:

The California Department of Fish and Wildlife, Office of Spill Prevention and Response (CDFW-OSPR) has reviewed the City of Camarillo's (City) Draft Environmental Impact Report (DEIR) for the Camarillo Springs General Plan Amendment 2017-2 Project (Project). These comments are in addition to the CDFW's comments sent on November 5, 2020 from our South Coast Region. Thank you for your email on November 24, allowing us to submit late comments. As noted in the Nov. 24 email that my Supervisor Melissa Boggs sent to you, we asked if we could submit additional comments after the comment period ended on Nov. 5, because on November 17, 2020, CDFW-OSPR was notified by California Office of Emergency Services (CalOES) spill report # 20-6417 that oil was observed in a pond on the golf course and wildlife were dying. CDFW-OSPR subsequently determined the pond was located near the 12th hole (referred to as Golf Course Pond 7 [GCP-7] in the DEIR); and that it was injuring wildlife. So, again thank you for the opportunity to provide additional comments and recommendations regarding the oil in GCP-7 that has been and is still posing an ongoing threat to wildlife.

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

The proposed Project is located at the Camarillo Springs Golf Course (CSGC) in the City of Camarillo, Ventura County and will result in the development of approximately 32 acres of the existing 182-acre Camarillo Springs Golf Course (golf course) into low-to-medium density residential development and appurtenant facilities. Approximately 250 new single-family dwelling units are anticipated. The existing golf course pond and drainage features adjacent to the proposed residential development will also be re-configured. To accommodate these developments, approximately 700,000 cubic yards of earth will be collected from other portions of the project site and relocated to the proposed residential development site. Approximately 121.8 acres of the project site will be affected as part of the earth relocation. Upon completion of the earth movement, the project site will be recontoured to accommodate the newly

designed golf course, which will be completed as part of the proposed Project. An additional 2.7 acres of undeveloped lands, surrounding the outside boundaries of the golf course, will also be developed as part of the proposed Project.

As noted in the Hazards and Hazardous Materials Section of the DEIR (Section 5.8), the CSGC was built on top of the Conejo Oil Field and approximately 94 abandoned wells are located in the northeastern portion of the property. In 1995, a leak of crude oil was discovered from a former well and no records were available to identify what was done to address the problem. In May 2019, the California Department of Conservation, Geologic Energy Management Division (CalGEM) was contacted to investigate globs of oil floating in GCP-7. And in November 2019, CalGEM was again contacted to investigate a surface expression in approximately the same location.

CDFW-OSPR, also responded to the May 2019 incident, due to another CalOES report (19-3147) of oiled wildlife in GCP-7 near the 12th hole. As part of our response we called out the Santa Barbara Oiled Wildlife Care Network which collected one live oiled double crested cormorant (euthanized) and two live oiled mallards (one euthanized and one rehabilitated and released) from the site. After we initially responded, CDFW-OSPR requested the CSGC to: 1) hire a contractor and clean up the oil and remove oiled vegetation; 2) keep water level in the pond as low as possible; and 3) put up fencing and flagging to help exclude wildlife from the oil on the pond. The golf course implemented these recommendations. At that time, CDFW-OSPR was told that the golf course was working with the city on a permit to fill in this problem pond near the 12th hole. We coordinated our response with CalGEM. As referenced in section 5.8 of the DEIR, CalGem sent a letter to the golf course dated April 8, 2020, that stated:

“On May 15, 2019, this office was contacted to investigate globs of oil floating on a pond on the 12th hole at the Camarillo Springs Golf Course. The California Geologic Energy Management Division (CalGEM) met with the California Department of Fish and Wildlife (CDFW) at the site. CDFW deemed that there was no harm to wildlife or the environment at that time. On November 20, 2019, this office was contacted again about an oil seep at approximately the same location. CalGEM staff investigated the site and found the pond nearly drained with absorbent boom around the seeps near the shoreline of the pond. Old records and aerial photographs were reviewed from the 1920's to present to try and pinpoint the source of the seep. Aerial photographs did not depict any potential well in the vicinity of the seep. In addition, well records were reviewed. Natural oil seepage is known in this area. To date no evidence of a well has been found at the site. If a well is exposed at the site, please notify this office immediately.”

To clarify, after CSGC implemented CDFW-OSPR's mitigation recommendations at GCP-7 in May 2019, the threat to wildlife from the oil was reduced, the golf course was managing the water level in the pond, and we were informed that the CSGC was working with the City of Camarillo on a construction permit that would allow them to fill the pond. Accordingly, when we met with CalGEM at the site, we believed the oil in this pond and the risk to wildlife were being addressed sufficiently at that time.

However, as noted above, we recently became aware of another report of oil and oiled wildlife in GCP-7 (CalOES spill report # 20-6417, reported on November 17, 2020). CDFW-OSPR staff responded to the site on November 19, 2020. During the November 19 site inspection,

the GCP-7 near the 12th hole was again full of water, the wetland vegetation had grown back, and crude oil was pooling in 2 locations in the pond. It appears water continues to enter GCP-7 through a stormwater outfall that discharges runoff from the neighborhood storm drain system to the east of GCP-7. Additionally, oil is continuing to enter the pond from two different expressions within the pond. The location of the two expressions appears to correlate to the approximate location of two abandoned wells identified in CalGEM's Well Finder tool as API 04111538 Viking Well # 2 and API 0411100539 Viking Well #3. See attachments A and B.

The golf course manager informed us that they routinely pump out water from GCP-7 to other ponds on the golf course to keep the water level down, but that during rain events they can't keep up with the runoff entering the pond and the water level rises significantly. Also, on November 19, we collected several oiled bird carcasses that a neighbor collected on November 14, 2020, adjacent to GCP-7.

On November 24, 2020, CDFW-OSPR sent an email to the golf course manager with a list of recommended mitigation measures we consider to be only a temporary solution to this ongoing oil problem in GCP-7. We explained to the golf course manager that the situation requires the golf course to implement ongoing management and maintenance of the oil in the pond. We also requested the golf course to inform us when these interim measures have been implemented so we can schedule another site inspection. The interim mitigation measures include:

1. Put up a few solar power predator lights for wildlife hazing.
2. Put up more fishing line with mylar tape instead of yellow caution tape for wildlife hazing.
3. Consider placing netting to cover most of pond.
4. Install spill containment boom to keep the oil from leaving the contained area of the pond.
5. Place absorbent boom outside the containment boom to absorb small amounts of oil that may escape the hard boom.

CDFW-OSPR understands that currently the project does not include filling in GCP-7, and that additional lake/ponds would be created with overflow into Conejo Creek. Additionally, the plans do not envision active operational activities during flood events. Accordingly, CDFW-OSPR offers the additional comments and recommendations below to assist the City of Camarillo in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources.

Comment #1: Section 4, Project Description Section

Figure 4-2, Conceptual Trails, Open Space, and Private/Public Amenities shows GCP-7 (identified as #3 in the figure legend) and it indicates this pond will remain in place as part of this Project. Additionally, Figure 4-3, Proposed Drainage Master Plan, shows an existing storm drainpipe to this pond. CDFW-OSPR is concerned about leaving GCP-7 in place due to the oil expressions into this pond and the exposure risk to wildlife from the oil. As such, we recommend GCP-7 be filled in to reduce the oil exposure to wildlife and the drainage pipe to the pond be redirected. Alternatively, the source of the oil should be investigated and addressed as discussed in Comments #5 and #6 below.

Comment #2: Section 5.3, Biological Resources Section

Section 5.3 does not address impacts to oiled wildlife from the GCP-7 near the 12th hole. As noted above, the continued expression of oil into GCP-7 has resulted in oiling of wildlife.

CDFW-OSPR had been previously informed that CSGC was working with the City of Camarillo on a permit to allow construction that would fill in GCP-7 and redirect stormwater runoff from the east which would reduce wildlife exposure hazards posed by the oil. CDFW-OSPR recommends incorporating the continuing problems with oil expressions into GCP-7 near the 12th hole into this section of the DEIR to acknowledge the ongoing threat the oil is posing to the wildlife.

Comment #3: Section 5.3, Biological Resources Section

Page 5.3-44 states, "Drainage B originates from a storm drainpipe under Ridge View Street and extends for approximately 334 linear feet before sheet flowing onto the golf course. Drainage B is hydrologically connected via surface flow to Golf Course Pond 7, which is ultimately hydrologically connected to Golf Course Pond 2 via underground pipes, which is connected to Conejo Creek via surface flow." This seems to conflict with Appendix G, Biological Resources Technical Report, which on Exhibit 7 identifies GCP-7 as an Upland Retention Basin and states on page 33, "The final category consists of upland retention basins. These basins are located in depressions of upland areas and collect water from upland areas. None of the basins connect to any of the features described above." If GCP-7 is hydrologically connected to other ponds and the creek, we have concerns oil from GCP-7 could potentially impact wildlife in other ponds and/or Conejo Creek. The connectivity between GCP-7 and other water bodies should be clarified.

Comment #4: Section 5.8, The Hazards and Hazardous Materials Section

This section does not adequately address oil in the GCP-7 near the 12th hole. There are two expression locations where oil is seeping up into GCP-7. This has resulted in injury to birds and poses an ongoing threat to birds.

Comment #5: Section 5.8, The Hazards and Hazardous Materials Section

On page 5.8-8 the DEIR states, "The presence of active and former oil wells within the project site boundary and within 1/4 mile radius is considered a recognized environmental condition." As such, CDFW-OSPR requests Mitigation Measures HM-3, HM-4 and HM-5 be implemented as soon as possible. Mitigation Measure HM-3 states, "Prior to the issuance of grading permits, the project developer shall conduct a subsurface investigation including a geophysical survey and soil sampling to evaluate potential impact associated with the former oil wells. If any soil requiring remediation due to presence of the wells is identified, the project developer shall prepare and submit to the City a soil management and remediation program to remediate the soil to acceptable levels by measures such as removal of the contaminated soils to an off-site Class III landfill, implementation of a soil management program to reduce the concentrations present, or leaving the material in place and capping it with clean fill material. If any wells are identified, the project developer shall comply with Mitigation Measure HM-4." Mitigation Measure HM-4 states, "Prior to the issuance of grading permits, the project developer shall have all wells identified within the project site tested for liquid and gas leakage. Any wells found leaking shall be reported to CalGEM immediately. The developer shall submit a report of findings to CalGEM and the City of Camarillo. Surveyed locations shall be provided in Latitude and Longitude, NAD 83 decimal format." And, Mitigation Measure HM-5 states, "Prior to the issuance of grading permits, the project developer shall submit to the City of Camarillo a report that identifies all oil wells in the vicinity of the grading and construction areas and that specifies whether the wells are to be re-abandoned to current CalGEM Idle Well Program standards or whether grading and construction setbacks are being provided from the well casings."

Comment #6: Section 5.8, The Hazards and Hazardous Materials Section

During construction, if an oil well(s) is/are discovered at GCP-7, notify CalGEM immediately. If the source of the oil that is seeping up in the two locations in GCP-7 is determined to be an oil well(s), CDFW-OSPR's primary recommendation is to coordinate with CalGem on oil well repair and/or re-abandonment .

Comment #7: Appendix G, Biological Resources Technical Report, Section 4.4.2 Increased Dust and Urban Pollutants

This section states, "During construction and operation, excess silt, petroleum, or chemicals on the soil surface from the project site could be washed into drainages during storms and may affect areas downstream of the project site. Adverse effects on water quality could indirectly impact species that use riparian areas within the watershed by affecting the food web interactions (e.g., abundance of insects or other prey) or through biomagnification (i.e., the buildup of pesticides to toxic levels in higher trophic levels). This impact is potentially significant. Implementation of MM 8 would prevent potential impacts." MM Bio 8 states, "During construction and project implementation, the applicant shall incorporate Best Management Practices (BMPs), including applicable measures required through the National Pollutant Discharge Elimination System (NPDES) requirements, to ensure that the quantity and quality of runoff discharged by proposed project activities does not adversely affect habitats adjacent to the project site. Specifically, the BMPs incorporated during construction of the project shall require all stormwater runoff be captured and treated to remove pollutants and sediment prior to release offsite. BMPs shall also be used to minimize erosion." This mitigation measure does not address the current oiling in GCB-7' and we believe it should be included.

Comment #8: Appendix R, Master Drainage Plan

It appears per the Master Drainage Plan that GCP-7 is slated to remain an open water pond. According to Figure 6 "Proposed Master Drainage Plan" in Appendix R, GCP-7 is not included in the "Proposed Storm Water Flow Path" that leads to Conejo Creek. If the subject pond will not be filled in and the stormwater from the eastern adjacent neighborhood redirected, then GCP-7 should be included in this Figure to show the connectivity of GCP-7 to other waterways downstream.

Comment #9: Appendix R, Master Drainage Plan

We have been unable to determine the source of the oil in the subject pond and oil continues to express in this pond and injure wildlife. Therefore, we believe the best solution to reduce the oil exposure to wildlife from GCP-7 is to modify the drainage flow from the eastern adjacent neighborhood, redirect the water flow away from GCP-7, and ideally to fill in GCP-7. We believe if these drainage improvements cannot be implemented, the ongoing significant environmental impacts of the oil in GCP-7 will continue to injure/kill wildlife.

We appreciate the opportunity to provide comments on the Project after the official comment period ended. CDFW-OSPR requests an opportunity to review and comment on any response that the City has to our comments. If you have any questions or comments regarding this letter, please contact Mike Connell, Senior Environmental Scientist (Specialist), at Michael.Connell@wildlife.ca.gov.

Sincerely,



Michael Connell

Enclosure

CC (Via Email):

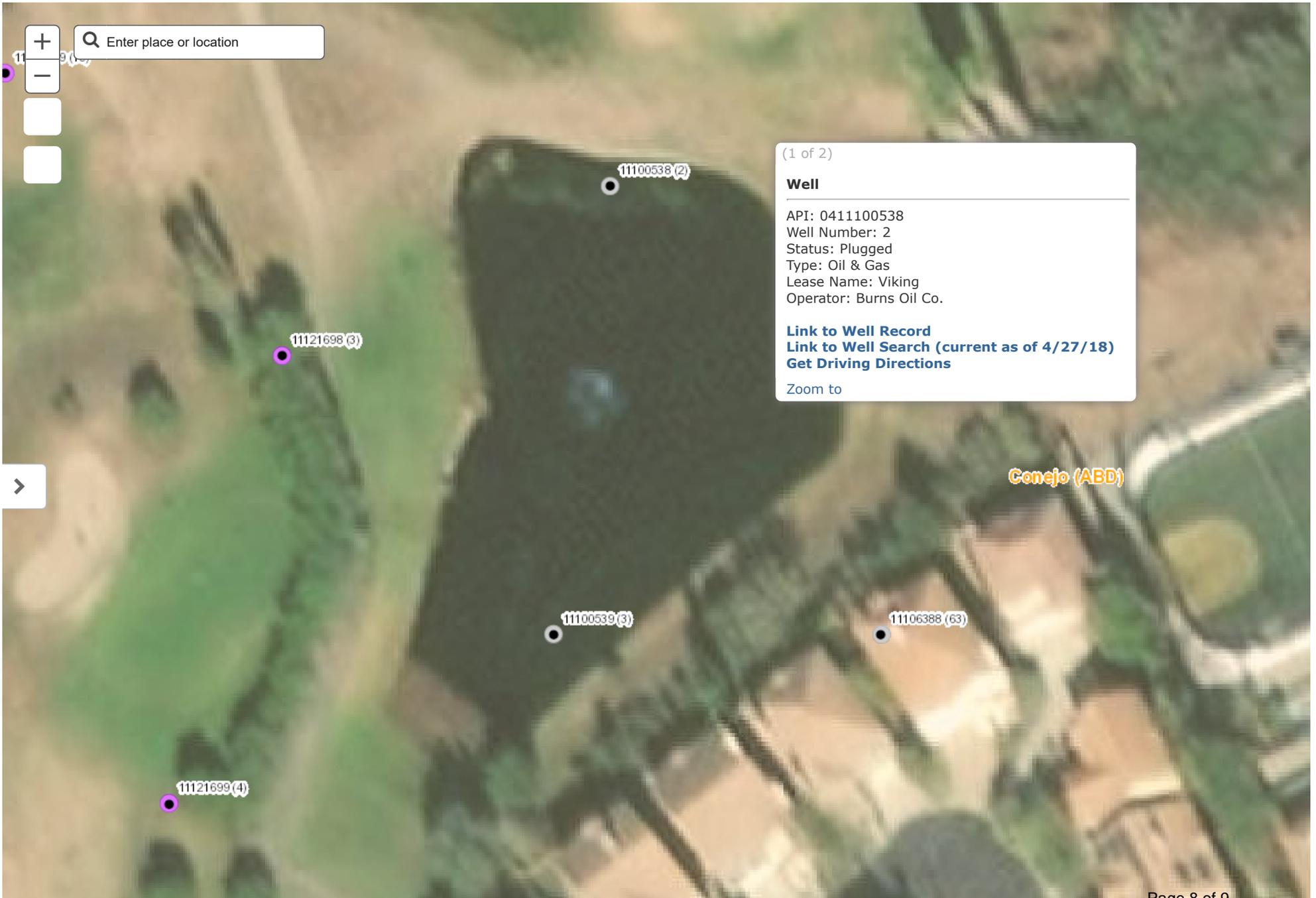
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State Clearinghouse, Sacramento State.Clearinghouse@opr.ca.gov

Attachments A and B



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(1 of 2)

Well

API: 0411100538
Well Number: 2
Status: Plugged
Type: Oil & Gas
Lease Name: Viking
Operator: Burns Oil Co.

[Link to Well Record](#)
[Link to Well Search \(current as of 4/27/18\)](#)
[Get Driving Directions](#)

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Conejo (ABD)



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11100538 (2)

11102263 (59)

11121698 (3)

11100521 (3)

Conejo (ABD)

11100539 (3)

11121699 (4)

(1 of 2)

Well

API: 0411100539
Well Number: 3
Status: Plugged
Type: Oil & Gas
Lease Name: Viking
Operator: Burns Oil Co.

[Link to Well Record](#)
[Link to Well Search \(current as of 4/27/18\)](#)
[Get Driving Directions](#)

Zoom to