

State of California – Natural Resources Agency

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Governor's Office of Planning & Research

November 5, 2020

**Nov 05 2020**

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## STATE CLEARINGHOUSE

**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 (CDFW) has reviewed the City of Camarillo's (City) Draft Environmental Impact Report (DEIR) for the Camarillo Springs General Plan Amendment 2017-2 Project (Project). The DEIR's supporting documentation includes *Appendix G: Biological Resources Technical Report (BSR)*.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

### CDFW's Role

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.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

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## Project Description and Summary

**Objective:** The proposed Project 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 is also to 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.

### Location:

The proposed Project is located at the Camarillo Springs Golf Course in the City of Camarillo, Ventura County, California and is located within the US Geological Survey's (USGS') Newbury Park 7.5-minute quadrangle. The elevation of the Project site ranges from 90 to 250 feet above mean sea level. The majority of Project activities are planned to occur on the Camarillo Springs Golf Course. However, there are undisturbed hillsides that encompass portions of the golf course. In addition, Conejo Creek occurs along much of the western boundary of the property. The golf course and associated facilities include landscaped greens, trails, water features (such as ponds), a driving range, a clubhouse, parking lot, and maintenance facilities.

## Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the DEIR. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resource Code, § 21081.6; CEQA Guidelines, § 15097).

### Comment #1: Impacts to Aquatic and Riparian Resources

**Issue #1:** On page 38 of the BSR, the City states, “[t]he proposed [P]roject is anticipated to impact waters under the jurisdiction of [...] CDFW. Jurisdictional resources are protected by [...] California Fish and Game Code (Sections 1600 through 1616). Impacts on jurisdictional resources would be significant and would require permitting with each of the resource agencies.” CDFW agrees that the Project location supports streams and other waters subject to notification under Fish and Game Code, section 1600 *et seq.* Jurisdictional surveys should evaluate all rivers, streams, and lake including culverts, ditches, storm channels that may transport water, sediment, and pollutants and discharge into rivers, streams, and lakes.

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**Issue #2:** Riparian and wetland resources are sensitive and finite resources in Southern California. Page 38 in the BSR indicates that several riparian and wetland vegetation alliances, including California bulrush marsh, Arroyo willow thickets, and mulefat thickets, would be adversely impacted by Project activities. CDFW is concerned that the City did not consider designing the golf course around riparian and wetland resources as a possible alternative to direct impacts.

**Issue #3:** CDFW is concerned that Project-related activities will impact Conejo Creek, which lies immediately west of the proposed Project. Project activities could adversely impact riparian vegetation along the creek. Project construction activities and new drainages may increase sedimentation downstream, reduce the amount of water availability downstream, result in or increase creek bank erosion, and spread non-native invasive plants.

**Issue #4:** The Project will impact streams, wetlands, and waterways (as stated in page 48 of the BSR), which are vulnerable resources in the State. CDFW disagrees with a mitigation ratio of 1:1. CDFW recommends avoiding any sensitive natural communities found on the Project. If avoidance is not feasible, mitigating at a ratio of no less than 5:1 for impacts to S3 ranked communities and 7:1 for S2 communities should be implemented. This ratio is for the acreage and the individual plants that comprise each unique community. All revegetation/restoration areas that will serve as mitigation should include preparation of a restoration plan, to be approved by CDFW and all other pertinent permitting agencies prior to any ground disturbance. The restoration plan should include restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and, a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (Assembly Bill 1094; Government Code, §§ 65965-65968).

**Specific Impacts:** The Project would result in permanent loss of riparian and wetland vegetation within the Project site. Streams, lakes, and wetlands would be removed and reconfigured. New drainage features and realignment of golf course holes would occur throughout the Project area.

**Why impacts would occur:** Project implementation includes grading, excavating, material staging, grubbing, and vegetation clearing that may result in direct mortality and loss of sensitive vegetation communities, including riparian and wetland habitats, in the Project site. Installation of new drainages (e.g., green, sand bunker, and tee) and gravel paths, as well as reconfiguration of water features, may alter and divert water flow and reduce groundwater infiltration and water availability to riparian vegetation along Conejo Creek. Increased sediment deposition can bury seedlings and saplings of riparian trees, resulting in increased mortality of new recruits (Kui and Stella 2016). Construction equipment, vehicles, import of fill material, disposal piles, and staging areas can introduce and spread non-native, invasive plants. Invasive plant seeds, rhizomes, or stolons can be transported along Conejo Creek and spread upstream and downstream.

**Evidence impacts would be significant:** Riparian habitats provide important food, nesting habitat, cover, and migration corridors for wildlife. Only 5 to 10% of California's original riparian habitat exists today and much of the remaining habitat is in a degraded condition. In addition, the Project may adversely affect riparian habitat by altering Conejo Creek.

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The riparian and wetland vegetation alliances addressed within the DEIR are considered sensitive. Impacts to sensitive vegetation communities should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive plant communities will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species or vegetation community identified as a candidate, sensitive, or special status species.

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1:** CDFW concurs with the City's statement to notify CDFW pursuant to Fish and Game Code, section 1600 *et seq.* The City should notify prior to any Project construction or activities. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. Please visit the [Lake and Streambed Alteration Program](#) webpage to obtain a notification package for a LSA.

CDFW's issuance of an LSA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the City for the Project. However, the DEIR does not meet CDFW's standards for the habitat mitigation measures and monitoring needed to meet the no net loss of aquatic habitats. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to the streams or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA.

Any LSA permit issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project site. The LSA may include further erosion and pollution control measures. To compensate for any on-site and off-site impacts to riparian and wetland resources, additional mitigation conditioned in any LSA may include the following: avoidance of resources, on-site or off-site creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.

**Mitigation Measure #2:** Jurisdiction surveys should evaluate all rivers, streams, and lakes including culverts, ditches, storm channels that may transport water, sediment, and pollutants and discharge into rivers, streams, and lakes. CDFW recommends LSA Notification following modifications to Conejo Creek and waters throughout the Project site.

**Mitigation Measure #3:** CDFW concurs with the City's statement to prepare a Habitat Mitigation Monitoring Plan (HMMP) for on and/or off-site mitigation and recommends the City submit the HMMP to CDFW for review. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. The following information, methods, and goals shall be included and adopted in a HMMP.

- a) Provide the total acreage of unique sensitive vegetation alliances impacted, and number of plants impacted by species, broken down by vegetation class (i.e., ground cover, forbs, subshrub, shrub, tree).

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- b) Provide the specific location of on- and/or off-site mitigation area(s) and a science-based discussion as to why the mitigation area(s) is appropriate for mitigating Project-related impacts. Describe the area(s) environmental features (i.e., soils, slope, existing vegetation, hydrology) that would suggest the mitigation area(s) can support the vegetation and wildlife impacted by Project activities.
- c) Apply an ecosystem-based restoration approach rather than considering a single species (Fish & Game Code, § 43). A plant palette shall consist of species that are diverse with respect to growing duration (annual, perennial), life form (grasses, shrubs, trees, vines), and structure (ground cover, shrubs, tree canopy) that form the vegetation alliance that is being mitigated.
- d) Submit a current vegetation survey conducted at a reference site containing the vegetation alliance(s) being mitigated, with as good or better quality habitat, to document the density, abundance, diversity, and percent cover for each species by vegetation class.
- e) Submit a plan that includes, at a minimum: a) the specific location of restoration sites and assessment of reference sites; b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; c) a schematic depicting the mitigation area; d) a local seed and cuttings and planting schedule; e) a description of the irrigation methodology; f) measures to control exotic vegetation on site; g) specific success criteria; h) a detailed monitoring program; i) contingency measures should the success criteria and providing for conservation of the mitigation on site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.
- f) Apply a minimum revegetation success criterion of 80% survival by vegetation alliance and by species the first year, and 100% survival thereafter. Proposed plantings shall replace these species at the existing densities with no more than a 10% cover, diversity, abundance, or density deviation. Prior to the revegetation areas being determined successful, they shall be entirely without supplemental irrigation, weeding, or plant replacement, for a minimum of 3 years (as weeding and plant replacement are considered site establishment). Herbaceous invasive species shall not exceed 5% cover (zero % cover for any species listed on the [California Invasive Plant Council's](#) invasive plant list, including the watch list). If the survival, density, and cover requirements have not been met, the City will be responsible for replacement planting to achieve these requirements. Replacement plants shall be monitored with the same survival and growth requirements for 7 years after planting, with 3 additional years of no irrigation, weeding, or further replacement planting.
- g) Provide a pest management plan, that reduces or eliminates the use of chemicals. Pesticide, fungicide, and rodenticide use can lead to a reduction of predator bird populations, contamination of drinking, ground and surface water, elevation of non-pest species to pest status and the evolution of resistant insect strains. Potential effects from the use of fertilizers include eutrophication of surface waters which can result in algae blooms and fish kills, changes in ecosystem productivity, contamination of ground water with nitrates, and depletion of stratospheric ozone by nitrous oxides.

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A pest management plan shall avoid use of pesticides for invasive plant control in riparian woodlands and near flowing or standing water. When manual and mechanical removal methods are not effective, pesticides could be used in conjunction with physical removal methods for species that are known to be difficult to control. Apply herbicide using a localized spot-treatment method and in a manner that would eliminate or reduce drift onto native plants. Herbicides would be applied to cut stumps for larger plants or large clumps of herbaceous non-native species that cannot effectively be removed. In all such cases, herbicides would be used only to the extent necessary to support native plant establishment and limit adverse impacts to sensitive species and habitats. For sites within 100 feet of flowing or standing water or wetland vegetation, herbicides approved by the United States Environmental Protection Agency for use near wetlands and streams shall be used.

- h) Provide special habitat elements where feasible to benefit key wildlife species. These physical and biological features can include (for example) retention of woody material, logs, snags, rocks, and brush piles.

**Recommendation #1:** The City should consider restoring and enhancing riparian and wetland habitat in the golf course and protecting Conejo Creek from degradation. In addition, CDFW recommends including appropriate native plants and habitats, wherever possible, which can enhance flora and fauna biodiversity and reduce water runoff, irrigation, and chemical inputs (Cristol and Rodewald 2005; Merola-Zwartjes and DeLong 2005; Nooten et al. 2018; Terman 1997). Naturalistic golf courses may also promote critical ecosystem services (e.g., seed dispersal, pest regulation, pollination) and form habitat linkages between different habitats (Petrosillo et al. 2019).

A *Certified Audubon Cooperative Sanctuary* designation is awarded by the Audubon Society to golf courses that meet environmental management standards in six environmental components that include wildlife and habitat management, chemical use reduction and safety, and water conservation. To be a certified golf course, personnel must develop and implement an environmental management plan and document the results. A HMMP prepared for CEQA/LSA could be used to pursue certification if the City decides to design a naturalistic golf course to mitigate for Project impacts. In California, 78 golf courses are certified members. In southern California, certified golf courses include the Alta Vista Country Club (Placentia), Anaheim Hills Golf Course (Anaheim), Aliso Viejo Country Club (Aliso Viejo), and Birch Hills Golf Course (Brea). For more information please visit the [Audubon Cooperative Sanctuary Program for Golf](#) webpage.

**Recommendation #2:** CDFW recommends mapping vegetation communities. Surveys should be conducted by a qualified botanist with appropriate experience and knowledge of southern California flora. Surveys should follow CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities](#). The Manual of California Vegetation should be used to inform survey and mapping of natural vegetation communities which would allow CDFW to appropriately comment on potential impacts to sensitive plants and vegetation communities. CDFW recommends mapping vegetation communities such as mulefat thickets, Arroyo willow thickets, California bullrush marshes, and adjacent areas where Project activities could have direct or indirect impacts on biological resources.

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**Recommendation #3:** CDFW recommends the City evaluate potential impacts on any additional biological resources (e.g., rare plants, wildlife) in areas adjacent to the Project site where there is hydrologic connectivity. Areas should include Conejo Creek.

CDFW recommends the City disclose methodology and findings in environmental documents, including negative findings (e.g. absence of rare plants), with a discussion of potential impacts and if necessary, avoidance, minimization, and mitigation measures. If there are potentially significant impacts and a revision of the DEIR is needed, CDFW recommends recirculating the DEIR and environmental documents so CDFW may provide more appropriate comments on avoidance, minimization, and mitigation measures (CEQA Guidelines, § 15073.5).

**Recommendation #4:** Mitigation should not substitute for implementation of an alternative that would completely avoid impacts to aquatic and riparian resources. Completely avoiding impacts to aquatic and riparian resources would significantly reduce adverse impacts of the Project on these sensitive habitats. CDFW recommends the City consider on-site mitigation for Project-related impacts by redesigning the golf course around existing riparian and wetland resources such that there is no net loss of riparian and wetland resources and Conejo Creek is not altered, impeded, or degraded relative to existing conditions.

#### **Comment #2: Impacts to Nesting Birds**

**Issue:** Thirty common bird species were observed during biological surveys. In addition, 15 special status species of birds may occur within the Project area. Native and non-native trees and shrubs within the Project site may provide suitable nesting sites and habitat for a variety of birds and raptors. CDFW is concerned that mitigation measures proposed for impacts to nesting birds are inadequate.

**Specific impacts:** Construction during the breeding season for nesting birds could result in the loss of fertile eggs or nestlings or otherwise lead to nest abandonment.

**Why impacts would occur:** Impacts could result from noise disturbances, increased human activity, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment. Such disturbances could result in increased nestling mortality due to nest abandonment or decreased feeding frequency.

**Evidence impact would be significant:** Nests of all native bird species are protected under State laws and regulations, including Fish and Game Code, sections 3503 and 3503.5. Noise from increased road use, generators, and other equipment may disrupt mating calls which could impact their reproductive success (Patricelli and Blickley 2006, Halfwerk et al. 2011). CDFW also considers impacts to Species of Special Concern (SSC) a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures.

**Recommended Potentially Feasible Mitigation Measure(s):** CDFW recommends replacing Avoidance, Minimization, or Mitigation Measure BIO-3 with the following three measures.

**Mitigation Measure #1:** To protect nesting birds that may occur on site, no construction shall occur from February 1 through September, and as early as January 1 for raptors. Work that occurs during the nesting season shall be mitigated at a ratio commensurate with impacts.

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**Mitigation Measure #2:** If an active nest is found within 500 feet of Project activities and in areas with increased impacts resulting from noise disturbances, human activity, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment, a qualified biologist shall determine the nesting status and set up a species-appropriate no-work buffer that should be no less than 300 feet initially. Buffers shall be marked around the active nest site as directed by the qualified biologist.”

No Project activities shall be allowed inside these buffers until the qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. These buffers shall be increased if needed to protect the nesting birds.

**Mitigation Measure #3:** Vegetation clearing and grubbing activities when birds are likely to be nesting shall be monitored by a qualified biologist and shall only occur when a qualified biologist is present to ensure that these activities remain within the Project footprint (i.e. outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to Project activities.

### **Comment #3: Spreading invasive pests and diseases**

**Issue:** CDFW is concerned that the DEIR does not describe procedures for disposal of removed trees which may be infested with invasive pests and disease. For example, the environmental document should address the presence or absence of goldspotted oak borer (*Agrilus auroguttatus*), Polyphagus shot-hole borer (*Euwallacea* sp.), and thousand canker fungus (*Geosmithia morbida*) in on-site trees and, if present, describe how any effected trees would be disposed of as part of the Project.

**Specific impacts:** The Project proposes to remove a substantial amount of vegetation. Improper disposal of vegetation may result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This could result in expediting the loss of oaks and other trees in California which support a high biological diversity including special status species.

**Why impacts would occur:** The Project would remove tree species that could host insect pests and diseases. Trees will be removed and presumably hauled to off-site locations for disposal thereby potentially exposing off-site oak and other tree species to infestation and disease.

**Evidence impact would be significant:** The Project may have a substantial adverse effect on any sensitive natural communities identified in local or regional plans, policies, and regulations or by the CDFW or U. S. Fish and Wildlife Service (USFWS). The Project may result in a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS that are dependent on habitats susceptible to insect and disease pathogens.

**Recommendation #1:** CDFW recommends the City work with the certified arborist to identify all trees and species for removal from the Project site and inspect those trees for contagious tree diseases including but not limited to: [thousand canker fungus](#), [Polyphagous shot hole borer](#), and [goldspotted oak borer](#). A summary report documenting inspection methods, number and

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species of trees inspected, results, and conclusions, including negative findings, should be submitted to CDFW for review and included as an appendix in final environmental documents. The summary report should also include photographic documentation of entry/exit holes and evidence of pests/disease.

**Recommendation #2:** If invasive pests and/or diseases are detected, the City should provide an infectious tree disease management plan and describe how it will be implemented to avoid significant impacts under CEQA. To avoid the spread of infectious tree diseases, diseased trees should not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed. A management plan should be submitted to CDFW for review and included as an appendix in the final environmental document.

#### **Comment #4: Impacts to Bats**

**Issue:** The golf course contains potential open water foraging habitat and is adjacent to natural habitats where bats may forage and roost. The BSR stated that several bat species have a moderate potential to occur in the Project site.

**Specific impacts:** The Project proposes to remove between several native and non-native trees. Direct impacts include removal of trees, vegetation, and/or structures that may provide roosting habitat and therefore has the potential for the direct loss of bats. Indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment. Demolition, grading, and excavating activities may impact bats potentially using man-made structures or surrounding trees as roost sites.

**Why impacts would occur:** In urbanized areas, bats use trees and man-made structures for daytime and nighttime roosts, and forage in sources of open water such as ponds and lakes (Avila-Flores and Fenton 2005; Oprea et al. 2009; Remington and Cooper 2014). Forested patches on golf courses provide good habitat for foraging and commuting bats, and golf courses may provide an important refuge for bats in highly urbanized landscapes (Sewell 2019). Mexican fan palm trees (*Washingtonia robusta*) and crevices in buildings, facilities, and tunnels in the Project site could provide roosting habitat for bats. Modifications to roost sites can have significant impacts on the bats' usability of the roost and can impact the bats' fitness and survivability (Johnston et al. 2004). Extra noise, vibration, or the reconfiguration of large objects can lead to the disturbance of roosting bats which may have a negative impact on the animals. Human disturbance can also lead to a change in humidity, temperatures, or the approach to a roost that could force the animals to change their mode of egress and/or ingress to a roost. Although temporary, such disturbance can lead to the abandonment of a maternity roost (Johnston et al. 2004).

**Evidence impact would be significant:** Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & Game Code, § 4150; Cal. Code of Regs, § 251.1). Several bat species are considered SSC and meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15065). Take of SSC could require a mandatory finding of significance by the City (CEQA Guidelines, § 15065).

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**Recommended Potentially Feasible Mitigation Measure(s):**

**Recommendation #1:** CDFW recommends a qualified bat specialist conduct bat surveys to determine baseline conditions within the Project site and within a 500-foot buffer to identify trees and/or structures (i.e., tunnels, maintenance buildings, food concession stands, comfort stations) that could provide daytime and/or nighttime roost sites. CDFW recommends using acoustic recognition technology to maximize detection of bats. Night roosts are typically utilized from the approach of sunset until sunrise. In most parts of California, night roost use will only occur from spring through fall while day roosts are typically utilized during the spring, summer, and fall in California (Johnston et al. 2004).

**Recommendation #2:** Survey methodology and results, including negative findings, should be included in final environmental documents. Depending on survey results, please discuss potentially significant effects of the proposed Project on the bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125).

**Recommendation #3:** If maternity roosts are found, CDFW recommends, the following three mitigation measures.

- a) If maternity roosts are found, to the extent feasible, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost (March 1 to September 30).
- b) If maternity roosts are found and if trees and/or structures must be removed/demolished during the maternity season, a qualified bat specialist shall conduct a pre-construction survey to identify those trees and/or structures proposed for disturbance that could provide hibernacula or nursery colony roosting habitat. Acoustic recognition technology will be used to maximize detection of bats. Each tree and/or structure identified as potentially supporting an active maternity roost shall be closely inspected by the bat specialist no more than 7 days prior to tree and/or structure disturbance to determine the presence or absence of roosting bats more precisely. If maternity roosts are detected, trees and/or structures determined to be maternity roosts shall be left in place until the end of the maternity season. Work shall not occur within 100 feet of or directly under or adjacent to an active roost and work shall not occur between 30 minutes before sunset and 30 minutes after sunrise.
- c) If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year, trees will be pushed down using heavy machinery rather than felling it with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts shall not be bucked or mulched immediately. A period of at least 24 hours, and preferably 48 hours, shall elapse prior to such operations to allow bats to escape. Bats shall be allowed to escape prior to demolition of buildings. This may be accomplished by placing one-way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building.

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#### **Comment #4: Impacts to Non-Game Mammals and Wildlife**

**Issue:** While the golf course's existing fence may make it more difficult for wildlife movement between locations, wildlife may still move through the Project site during the daytime or nighttime. CDFW is concerned that any wildlife potentially moving through or seeking temporary refuge in the golf course may be directly impacted during Project activities and construction. Any final fence, or other design features, design should allow for wildlife movement.

**Specific impacts:** Project activities and construction equipment may directly impact wildlife and birds moving through or seeking temporary refuge in the golf course. This could result in wildlife and bird mortality. Furthermore, depending on the final fencing design, the Project may cumulatively restrict wildlife movement opportunity.

**Why impacts would occur:** Direct impacts to wildlife may occur from: ground disturbing activities (e.g., staging, access, excavation, grading); wildlife being trapped or entangled in construction materials and erection of restrictive fencing; and, wildlife could be trampled by heavy equipment operating in the Project site.

**Evidence impact would be significant:** Mammals occurring naturally in California are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & Game Code, § 4150; Cal. Code of Regs, § 251.1).

**Recommended Potentially Feasible Mitigation Measure(s):** CDFW recommends the following four mitigation measures to avoid and minimize direct impacts to wildlife during Project construction and activities.

**Mitigation Measure #1:** If fencing is proposed for use during construction or during the life of the Project, fences shall be constructed with materials that are not harmful to wildlife. Prohibited materials include, but are not limited to, spikes, glass, razor, or barbed wire. Fencing shall also be minimized so as not to restrict free wildlife movement through habitat areas.

**Mitigation Measure #2:** To avoid direct mortality, a qualified biological monitor shall be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. Salvaged wildlife of low mobility shall be removed and placed onto adjacent and suitable (i.e. species appropriate) habitat out of harm's way.

It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Program impacts associated with habitat loss.

**Mitigation Measure #3:** Grubbing and grading shall be done to avoid islands of habitat where wildlife may take refuge and later be killed by heavy equipment. Grubbing and grading shall be done from the center of the Project site, working outward towards adjacent habitat off site where wildlife may safely escape.

**Mitigation Measure #4:** Before starting or moving construction vehicles, especially after a few days of nonoperation, operators shall inspect under all vehicles to avoid impacts to any wildlife that may have sought refuge under equipment.

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**Mitigation Measure #5:** All hollow posts and pipes will be capped, and metal fence stakes will be plugged with bolts or other plugging materials to prevent wildlife entrapment and mortality.

The Project may result in the use of open pipes as fence posts, property line stakes, signs, etc. These structures mimic the natural cavities preferred by various bird species and other wildlife for shelter, nesting, and roosting. Raptor's talons can become entrapped within the bolt holes of metal fence stakes resulting in mortality.

**Recommendation #1:** CDFW recommends the City consider permeable fencing as part of its mitigation for Project-related impacts which may include a naturalistic golf course design. The existing fence can create hazards and barriers for wildlife movement, seasonal migrations, and access to food and water. Wildlife impermeable fencing is fencing that prevents or creates a barrier for the passage of wildlife from one side to the other. Los Angeles County's Significant Ecological Areas Ordinance [Implementation Guide](#) offers additional information on permeable fencing as well as design standards. CDFW recommends reviewing those design standards. CDFW should review plans for permeable fencing around the golf course if this is a feature the City would incorporate in its golf course redesign.

### **Additional Comments**

**Compensatory Mitigation:** Mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the City must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves. Mitigation banking inquiries may be directed to the CDFW's South Coast Region Banking Coordinator, Lisa Gymer, at (858) 627-3997 or via email at [Lisa.Gymer@wildlife.ca.gov](mailto:Lisa.Gymer@wildlife.ca.gov).

Per CEQA Guidelines, section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

### **Filing Fees**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the City and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & Game Code, § 711.4; Public Resources Code, § 21089).

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## Conclusion

We appreciate the opportunity to comment on the Project to assist the City in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Baron Barrera, Environmental Scientist, at [Baron.Barrera@wildlife.ca.gov](mailto:Baron.Barrera@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
B6E58CFE24724F5...

Erinn Wilson  
Environmental Program Manager I

Ec: California Department of Fish and Wildlife

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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



**Attachment A: Draft Mitigation and Monitoring Reporting Plan**

CDFW recommends the following language to be incorporated into a future environmental document for the Project.

<b>Biological Resources (BIO)</b>			
<b>Mitigation Measure (MM)</b>		<b>Timing</b>	<b>Responsible Party</b>
<b>MM-BIO-1- Impacts to Aquatic and Riparian Resources</b>	The City shall notify CDFW prior to any Project construction or activities pursuant to Fish and Game Code, section 1600 <i>et seq.</i> Please visit the <a href="#">Lake and Streambed Alteration Program</a> webpage to obtain a notification package for a LSA.	Prior to Project construction and activities	City of Camarillo
<b>MM-BIO-2- Impacts to Aquatic and Riparian Resources</b>	The City will prepare a Jurisdiction Delineation Report, which will evaluate all rivers, streams, and lakes including culverts, ditches, storm channels that may transport water, sediment, and pollutants and discharge into rivers, streams, and lakes, including Conejo Creek.	Prior to Project construction and activities	City of Camarillo

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<p><b>MM-BIO-3- Impacts to Aquatic and Riparian Resources</b></p>	<p>Vegetation communities shall be mapped. Surveys shall be conducted by a qualified botanist with appropriate experience and knowledge of southern California flora. Surveys shall follow CDFW's <a href="#">Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities</a>. The Manual of California Vegetation shall be used to inform survey and mapping of natural vegetation communities.</p> <p>Mapping shall be conducted within the Project site (i.e. Biological Study Area) and adjacent areas where Project activities could have direct or indirect impacts on biological resources.</p>	<p>Prior to Project construction and activities</p>	<p>City of Camarillo</p>
<p><b>MM-BIO-4- Impacts to Aquatic and Riparian Resources</b></p>	<p>The City shall evaluate potential impacts on any additional biological resources (e.g., rare plants, wildlife) in areas adjacent to the Project site where there is hydrologic connectivity.</p> <p>The City shall disclose findings in environmental documents, including negative findings (e.g. absence of rare plants), with a discussion of potential impacts and if necessary, avoidance, minimization, and mitigation measures. If there are potentially significant impacts and a revision of the DEIR is needed, the City shall recirculate the DEIR and environmental documents so CDFW may provide more appropriate comments on avoidance, minimization, and mitigation measures.</p>	<p>Prior to Project construction and activities</p>	<p>City of Camarillo</p>

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<p><b>MM-BIO-5- Impacts to Aquatic and Riparian Resources</b></p>	<p>The City shall consider on-site mitigation for Project-related impacts by redesigning the golf course around existing riparian and wetland habitats such that there is no net loss of sensitive habitats occur and Conejo creek is not altered. The City shall also consider restoring and enhancing riparian and wetland habitat in the golf course. See <b>Recommendation #1</b> on pages 6-7 for more information.</p>	<p>Prior to Project construction and activities</p>	<p>City of Camarillo</p>
<p><b>MM-BIO-6- Impacts to Aquatic and Riparian Resources</b></p>	<p>The City shall prepare a Habitat Mitigation Monitoring Plan (HMMP) and include, at a minimum, the information presented under <b>Mitigation Measure #6</b> on page 5.</p>	<p>Prior to Project construction and activities</p>	<p>City of Camarillo</p>
<p><b>MM-BIO-7- Impacts to Nesting Birds</b></p>	<p>To protect nesting birds that may occur on site, no construction shall occur from February 1 through September 15, and as early as January 1 for raptors. Work that occurs during the nesting season shall be mitigated at a ratio commensurate with impacts.</p>	<p>During Project construction and activities</p>	<p>City of Camarillo</p>
<p><b>MM-BIO-8- Impacts to Nesting Birds</b></p>	<p>If an active nest is found within 500 feet of Project activities and in areas with increased impacts resulting from noise disturbances, human activity, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment, a qualified biologist shall determine the nesting status and set up a species-appropriate no-work buffer that should be no less than 300 feet initially. Buffers shall be marked around the active nest site as directed by the qualified biologist.</p>	<p>During Project construction and activities</p>	<p>City of Camarillo</p>

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	No Project activities shall be allowed inside these buffers until the qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. These buffers shall be increased if needed to protect the nesting birds.		
<b>MM-BIO-9- Impacts to Nesting Birds</b>	Vegetation clearing and grubbing activities when birds are likely to be nesting shall be monitored by a qualified biologist and shall only occur when a qualified biologist is present to ensure that these activities remain within the Project footprint (i.e. outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to Project activities.	During Project construction and activities	City of Camarillo
<b>MM-BIO-10- Impacts to Bird Habitat</b>	<p>The City shall adopt an ecosystem-based management approach to restoring structurally and species diverse vegetation habitat for birds in the golf course. A vegetation community consisting of trees and shrubs shall be incorporated into a naturalistic redesign of golf course if applicable. See <b>Recommendation #1</b> on page 6 for additional information.</p> <p>The City shall use only native tree and shrub species for on or off-site mitigation. Impacts to non-native species will be replaced with native species. Information on alternatives for invasive, non-native, or landscaping plants may be found on the <a href="#">California Invasive Plant Council's, Don't Plant a Pest webpage</a>. The City shall not plant, seed, or otherwise introduce invasive exotic plant species to landscaped areas.</p>	Prior to Project construction and activities	City of Camarillo

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<p><b>MM-BIO-11- Spreading invasive pests and diseases</b></p>	<p>The City shall work with its certified arborist to identify all trees and species for removal from the Project site and inspect those trees for contagious tree diseases including but not limited to: <a href="#">thousand canker fungus</a> (<i>Geosmithia morbida</i>), <a href="#">Polyphagous shot hole borer</a> (<i>Euwallacea</i> sp.), and <a href="#">goldspotted oak borer</a> (<i>Agrilus auroguttatus</i>).</p> <p>A summary report documenting inspection methods, number and species of trees inspected, results, and conclusions, including negative findings, shall be submitted to CDFW for review and included as an appendix in final environmental documents. The summary report shall also include photographic documentation of entry/exit holes and evidence of pests/disease.</p>	<p>Prior to Project construction and activities</p>	<p>City of Camarillo</p>
<p><b>MM-BIO-12- Spreading invasive pests and diseases</b></p>	<p>If invasive pests and/or diseases are detected, the City shall provide and an infectious tree disease management plan and describe how it will be implemented to avoid significant impacts under CEQA. To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.</p> <p>A management plan shall be submitted to CDFW for review and included as an appendix in the final environmental document.</p>	<p>Prior to Project construction and activities</p>	<p>City of Camarillo</p>
<p><b>MM-BIO-13- Impacts to Bats</b></p>	<p>A qualified bat specialist shall conducted bat surveys to determine baseline conditions within the Project site and within a 500-foot buffer to identify trees and/or structures (i.e., tunnels, maintenance buildings, food concession stands, comfort stations) that could provide daytime and/or nighttime roost sites. Acoustic recognition technology shall be used to maximize detection of bats.</p>	<p>Prior to Project construction and activities</p>	<p>City of Camarillo</p>

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<p><b>MM-BIO-14- Impacts to Bats</b></p>	<p>The City shall include survey methodology and results, including negative findings, in final environmental documents. Depending on survey results, the City shall provide a discussion of potentially significant effects of the proposed Project on the bats and include species specific mitigation measures to reduce impacts to below a level of significance.</p>	<p>Prior to Project construction and activities</p>	<p>City of Camarillo</p>
<p><b>MM-BIO-15- Impacts to Bats</b></p>	<p>If maternity roosts are found, the City shall schedule work, to the extent feasible, to occur between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost (March 1 to September 30).</p>	<p>During Project activities</p>	<p>City of Camarillo</p>
<p><b>MM-BIO-16- Impacts to Bats</b></p>	<p>If maternity roosts are found and if trees and/or structures must be removed/demolished during the maternity season, a qualified bat specialist shall conduct a pre-construction survey to identify those trees and/or structures proposed for disturbance that could provide hibernacula or nursery colony roosting habitat. Acoustic recognition technology will be used to maximize detection of bats. Each tree and/or structure identified as potentially supporting an active maternity roost shall be closely inspected by the bat specialist no more than 7 days prior to tree and/or structure disturbance to determine the presence or absence of roosting bats more precisely. If maternity roosts are detected, trees and/or structures determined to be maternity roosts shall be left in place until the end of the maternity season. Work shall not occur within 100 feet of or directly under or adjacent to an active roost and work shall not occur between 30 minutes before sunset and 30 minutes after sunrise.</p>	<p>During Project activities</p>	<p>City of Camarillo</p>

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<p><b>MM-BIO-17- Impacts to Bats</b></p>	<p>If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year, trees will be pushed down using heavy machinery rather than felling it with a chainsaw. In order to ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts shall not be bucked or mulched immediately. A period of at least 24 hours, and preferably 48 hours, shall elapse prior to such operations to allow bats to escape. Bats shall be allowed to escape prior to demolition of buildings. This may be accomplished by placing one-way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building.</p>	<p>During Project activities</p>	<p>City of Camarillo</p>
<p><b>MM-BIO-18- Impacts to Non-game mammals and wildlife</b></p>	<p>If fencing is proposed for use during construction or during the life of the Project, fences shall be constructed with materials that are not harmful to wildlife. Prohibited materials include, but are not limited to, spikes, glass, razor, or barbed wire. Fencing shall also be minimized so as not to restrict free wildlife movement through habitat areas.</p>	<p>During Project construction and activities</p>	<p>City of Camarillo</p>
<p><b>MM-BIO-19- Impacts to Non-game mammals and wildlife</b></p>	<p>To avoid direct mortality, a qualified biological monitor shall be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. Salvaged wildlife of low mobility shall be removed and placed onto adjacent and suitable (i.e. species appropriate) habitat out of harm's way.</p>	<p>During Project construction and activities</p>	<p>City of Camarillo</p>

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<b>MM-BIO-20- Impacts to Non- game mammals and wildlife</b>	Grubbing and grading shall be done to avoid islands of habitat where wildlife may take refuge and later be killed by heavy equipment. Grubbing and grading shall be done from the center of the Project site, working outward towards adjacent habitat off site where wildlife may safely escape.	During Project construction and activities	City of Camarillo
<b>MM-BIO-21- Impacts to Non- game mammals and wildlife</b>	Before starting or moving construction vehicles, especially after a few days of nonoperation, operators shall inspect under all vehicles to avoid impacts to any wildlife that may have sought refuge under equipment.	During Project construction and activities	City of Camarillo
<b>MM-BIO-22- Impacts to Nesting Birds</b>	All hollow posts and pipes will be capped, and metal fence stakes will be plugged with bolts or other plugging materials to prevent wildlife entrapment and mortality.	During Project construction and activities	City of Camarillo