



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 South Coast Region
 3883 Ruffin Road
 San Diego, CA 92123
 (858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



November 24, 2020

Governor's Office of Planning & Research

Mr. Jeffery Butts
 6506 Hampton Boulevard
 Norfolk, VA 23508
Jeffery.Butts@navy.mil

November 24, 2020
STATE CLEARINGHOUSE

Subject: Environmental Assessment for the U.S. Home Basing of the MQ-25A Stingray Carrier-Based Unmanned Air System at Naval Base Ventura County, Ventura County

Dear Mr. Butts:

The California Department of Fish and Wildlife (CDFW) has reviewed the Environmental Assessment (EA) for the U.S. Home Basing of the MQ-25A Stingray Carrier-Based Unmanned Air System at Naval Base Ventura County Project (Project). 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 state-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.

Mr. Jeffery Butts
Naval Base Ventura County
November 24, 2020
Page 2 of 12

Project Description and Summary

Objective: The proposed Project would establish facilities and functions at Naval Base Ventura County to support West Coast home basing and operations of the MQ-25A Stingray Carrier Based Unmanned Air System (Stingray CBUAS). Project activities include home basing 20 Stingray CBUAS aircrafts; construction of a hangar, training facilities, and supporting infrastructure; aircraft maintenance; performing approximately 960 Stingray CBUAS annual flight operations; and housing approximately 730 workers and their family members.

The Hangar would be built along an existing flight-line and would be two-stories tall. The building is expected to be approximately 50 feet high and approximately 90,000 square feet (sq. ft.). The hangar aircraft apron would be approximately 710,000 sq. ft. and will be composed of concrete. The aircraft taxiways will be approximately 43,000 sq. ft. each. A 1,000 sq. ft. radio communications facility, a 16,000 sq. ft. antenna platform, a personnel parking break shelter, and access roads would be built within the approximate 93-acre project area as well.

The overall project footprint would be approximately 38.5 acres and the exact location of the various project elements would be determined during project design. Two taxiway connections from the hangar to existing Taxiway B (each 75 feet wide) would be constructed over a drainage ditch on the north side of the apron via culverts. Vehicular and pedestrian access to a 380-space personnel parking area would likely consist of two metal grated bridges over the drainage ditch. The ditch is located south of the proposed hangar site.

Location: The Ventura County Naval Base is located near Point Mugu in Ventura County. The base is surrounded by agriculture, urban development, and coastal wetlands. The Project footprint is largely comprised of existing structures and grasslands. The grasslands that will be developed are routinely mowed because of their proximity to active naval airstrips. Potential habitat types that could be impacted by the Project include coastal marsh, riparian scrub, annual grassland, native perennial grassland, and ruderal vegetation.

Wildlife with the potential to be impacted by the project from construction activities include the California Endangered Species Act (CESA)-listed Belding's savanna sparrow (*Passerculus sandwichensis beldingi*); the California Species of Special Concern (SSC) Southern California legless lizard (*Anniella stebbinsi*), burrowing owl (*Athene cunicularia*), Southern California saltmarsh shrew (*Sorex ornatus salicornicus*), and south coast marsh vole (*Microtus californicus stephensi*); and the ferruginous hawk (*Buteo regalis*).

Sensitive native plants that could be impacted by the Project include the California Native Plant Society (CNPS) List 1B salt marsh bird's beak (*Chloropyron maritimum ssp. maritimum*), and southern coastal salt marsh habitat.

Sensitive native insects species that could be impacted by the proposed Project include the Candidate CESA-listed Crotch bumble bee (*Bombus crotchii*), the S1 senile tiger beetle (*Cicindela senilis frosti*), the S1S2 globose dune beetle (*Coelus globosus*), and the S2 wandering skipper (*Panoquina errans*).

Mr. Jeffery Butts
Naval Base Ventura County
November 24, 2020
Page 3 of 12

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the Navy in adequately identifying, avoiding and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document.

Project Description and Environmental Protection Measure Shortcomings

Comment #1: Impacts to Special-Status Plant Species

Issue: Salt marsh bird's beak (CNPS List 1B) and southern coastal salt marsh habitat are known to occur within the vicinity of the Project and may be impacted by construction activities.

Specific impact: CDFW considers plant communities, alliances, and associations with a statewide ranking of S1, S2, S3, and S4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). An S3 ranking indicates there are 21-80 occurrences of this community in existence in California, S2 has 6-20 occurrences, and S1 has less than 6 occurrences. The Project may have direct or indirect effects to these sensitive species.

Why impact would occur: Project implementation includes grading, vegetation clearing for construction, maintenance, and other activities that may result in direct mortality, population declines, or local extirpation of sensitive plant species.

Evidence impact would be significant: Impacts to special status plant species 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 these sensitive plant species 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 identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s):

Recommendation #1: CDFW recommends conducting surveys for all sensitive/rare plants that are known to occur on-site and disclosing the results. Based on the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 2018) (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959>), a qualified biologist should "conduct surveys in the field at the time of year when species are both evident and identifiable. Usually this is during flowering or fruiting." The final environmental documentation should provide a thorough discussion on the presence/absence of sensitive plants on-site and identify measures to protect sensitive plant communities from project-related direct and indirect impacts.

Recommendation #2: In 2007, the State Legislature required CDFW to develop and maintain a vegetation mapping standard for the State (Fish & Game Code, § 1940). This standard complies with the National Vegetation Classification System, which utilizes alliance and association-based classification of unique vegetation stands. CDFW utilizes vegetation descriptions found in the Manual of California Vegetation (MCV), found online at <http://vegetation.cnps.org/>. To

Mr. Jeffery Butts
Naval Base Ventura County
November 24, 2020
Page 4 of 12

determine the rarity ranking of vegetation communities on the Project site, the MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system.

Recommendation #3: 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 USFWS and CDFW 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).

Comment #2: Impacts to CESA-Listed Species

Issue: There are multiple CESA-listed species with the potential to occur on the Project site.

Specific Impacts: Project related activities such as grading and road construction could lead to the direct or indirect mortality of listed animal and/or plant species.

Why impact would occur: Take of special status plant species, including federal Endangered Species Act (FSA) and CESA-listed species, may occur without adequate detection, avoidance and mitigation measures.

Evidence impacts would be significant: CDFW considers adverse impacts to special status species protected by CESA and the FSA, for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any state endangered, threatened, candidate species, or listed rare plant species pursuant to the NPPA that results from the Project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Take is defined in Section 86 of the Fish and Game Code as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”. Project impacts may result in substantial adverse effects, either directly or through habitat modifications, on a species protected under CESA.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: If the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a plant or animal species designated as rare, endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. [b],[c]). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain CESA authorization. Revisions to the Fish and Game Code, effective January 1998, may require CDFW issue a

Mr. Jeffery Butts
Naval Base Ventura County
November 24, 2020
Page 5 of 12

separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the fully mitigated requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP.

Comment #3: Impacts to Streams

Issue: CDFW is concerned that the Project will impact streams, subject to Fish and Game Code, section 1600 *et seq.* Section 3.2 of the EA discusses potential impacts to Waters of the U.S. and Wetlands, but does not indicate the need for notification for a Lake and Streambed Alteration Agreement (LSA) with CDFW.

Specific impacts: The Project may result in the loss of streams and associated watershed function and biological diversity. Grading and construction activities will likely alter the topography, and thus the hydrology, of the Project site.

Why impacts would occur: Ground disturbing activities from grading and filling, water diversions and dewatering would physically remove or otherwise alter existing streams or their function and associated riparian habitat on the Project site. Downstream streams and associated biological resources beyond the Project development footprint may also be impacted by Project related releases of sediment and altered watershed effects resulting from Project activities.

Evidence impacts would be significant: The Project may substantially adversely affect the existing stream pattern of the Project site through the alteration or diversion of a stream, which absent specific mitigation, could result in substantial erosion or siltation on site or off site of the Project.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: The Project may result in the alteration of streams. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a LSA with the applicant is required prior to conducting the proposed activities. A notification package for a LSA may be obtained by accessing CDFW's web site at <http://www.wildlife.ca.gov/habcon/1600>.

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 of the Lead Agency for the Project. However, the DEIR does not meet CDFW's standard at this time. 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 stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.

Mitigation Measure #2: Any LSA permit issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project. The LSA may include further erosion and pollution control measures. To compensate for any on-site and off-site

Mr. Jeffery Butts
Naval Base Ventura County
November 24, 2020
Page 6 of 12

impacts to riparian 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.

Comment #4: Impacts to Sensitive Insects

Issue: CDFW is concerned that suitable habitat for Crotch's bumble bee (candidate CESA-listed), senile tiger beetle (S1), the globuse dune beetle (S1S2), and the wandering skipper (S2) may be present and therefore could be impacted by the Project.

Specific impacts: The Project may result in temporal or permanent loss of suitable nesting and foraging habitat for the aforementioned insect species. Project ground-disturbing activities may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success.

Why impacts would occur: Ground disturbance and vegetation removal associated with Project activities during the breeding season could result in the incidental loss of breeding success or otherwise lead to nest abandonment in areas adjacent to the Project site. Project construction activities may also result in temporal or permanent loss of colonies and suitable nesting and foraging habitat.

Evidence impact would be significant: On June 12, 2019, the California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. The Project's potential to substantially reduce and adversely modify habitat for Crotch's bumble bee, reduce and potentially seriously impair the viability of populations of Crotch's bumble bee, and reduce the number and range of the species while taking into account the likelihood that special status species on adjacent and nearby natural lands rely upon the habitat that occurs on the proposed Project site.

Recommended Potentially Feasible Mitigation Measure(s):

Recommendation #1: Due to suitable habitat within the Project site, within one year prior to vegetation removal and/or grading, a qualified entomologist familiar with the species behavior and life history should conduct surveys to determine the presence/absence of the insects listed above. Survey results, including negative findings, should be submitted to CDFW prior to implementing Project-related ground-disturbing activities. At minimum, a survey report should provide the following:

- a) A description and map of the survey area, focusing on areas that could provide suitable habitat. CDFW recommends the map show surveyor(s) track lines to document that the entire site was covered during field surveys.
- b) Field survey conditions that should include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched.
- c) Map(s) showing the location of nests/colonies.
- d) A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, should include native plant composition

Mr. Jeffery Butts
Naval Base Ventura County
November 24, 2020
Page 7 of 12

(e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).

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 Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order 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).

Conclusion

We appreciate the opportunity to comment on the Project to assist the Navy in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the Navy 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, Baron.Barrera@wildlife.ca.gov or (858) 354-4114.

Sincerely,

DocuSigned by:

Erinn Wilson-Olgin

B6E58CFE24724F5...

Erinn Wilson-Olgin
Environmental Program Manager I

Ec: CDFW

Steve Gibson – Los Alamitos
Steve.Gibson@Wildlife.ca.gov

Emily Galli – Filmore
Emily.Galli@Wildlife.ca.gov

Susan Howell – San Diego
Susan.Howell@Wildlife.ca.gov

CEQA Program Coordinator – Sacramento
CEQACommentLetters@Wildlife.ca.gov

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

Mr. Jeffery Butts
Naval Base Ventura County
November 24, 2020
Page 8 of 12

References

California Department of Fish and Wildlife [CDFW]. March 20,2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <https://www.wildlife.ca.gov/Conservation/Plants>).

Municode.com. (2020). Municode Library. [online] Available at:
https://library.municode.com/ca/ventura_county/codes/code_of_ordinances?nodeId=DIV8P_LDE_CH1.1ZOCO_ART8GEDESTCOESPR_8178-7.7.4.1.1BINESU [Accessed 2 Jan. 2020].

National Research Council. 1995. *Science and the Endangered Species Act*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/4978>.

Sawyer, J.O., Keeler Wolf, T., and Evens J.M. 2008. A manual of California Vegetation, 2nd ed. ISBN 978 0 943460 49 9.

Mr. Jeffery Butts
 Naval Base Ventura County
 November 24, 2020
 Page 9 of 12

Attachment A: Draft Mitigation and Monitoring Reporting Plan

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

Biological Resources (BIO)			
Mitigation Measure (MM)		Timing	Responsible Party
MM-BIO-1- Impacts to Special-Status Plant Species	CDFW recommends conducting surveys for all sensitive/rare plants that are known to occur on-site and disclosing the results. Based on the <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities</i> (CDFW, 2018) (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959), a qualified biologist should “conduct surveys in the field at the time of year when species are both evident and identifiable. Usually this is during flowering or fruiting.” The final environmental documentation should provide a thorough discussion on the presence/absence of sensitive plants on-site and identify measures to protect sensitive plant communities from project-related direct and indirect impacts.	Prior to Project construction and activities	Navy
MM-BIO-2- Impacts to Special-Status Plant Species	In 2007, the State Legislature required CDFW to develop and maintain a vegetation mapping standard for the State (Fish & Game Code, § 1940). This standard complies with the National Vegetation Classification System, which utilizes alliance and association-based classification of unique vegetation stands. CDFW utilizes vegetation descriptions found in the Manual of California Vegetation (MCV), found online at http://vegetation.cnps.org/ . To determine the rarity ranking of vegetation communities on the Project site, the MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system.	Prior to Project construction and activities	Navy

Mr. Jeffery Butts
 Naval Base Ventura County
 November 24, 2020
 Page 10 of 12

<p>MM-BIO-3- Impacts to Special-Status Plant Species</p>	<p>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 USFWS and CDFW 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).</p>	<p>Prior to Project construction and activities</p>	<p>Navy</p>
<p>MM-BIO-4- Impacts to CESA-Listed Species</p>	<p>If the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a plant or animal species designated as rare, endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. [b],[c]). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain CESA authorization. Revisions to the Fish and Game Code, effective January 1998, may require CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the fully mitigated requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP.</p>	<p>Prior to Project construction and activities</p>	<p>Navy</p>

Mr. Jeffery Butts
 Naval Base Ventura County
 November 24, 2020
 Page 11 of 12

<p>MM-BIO-5- Impacts to Streams</p>	<p>The Project may result in the alteration of streams. For any such activities, the Project applicant (or “entity”) must provide written notification to CDFW pursuant to section 1600 <i>et seq.</i> of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a LSA with the applicant is required prior to conducting the proposed activities. A notification package for a LSA may be obtained by accessing CDFW’s web site at http://www.wildlife.ca.gov/habcon/1600.</p> <p>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 of the Lead Agency for the Project. However, the DEIR does not meet CDFW’s standard at this time. To minimize additional requirements by CDFW pursuant to section 1600 <i>et seq.</i> and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.</p>	<p>Prior to Project construction and activities</p>	<p>Navy</p>
<p>MM-BIO-6- Impacts to Streams</p>	<p>Any LSA permit issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project. The LSA may include further erosion and pollution control measures. To compensate for any on-site and off-site impacts to riparian 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.</p>	<p>Prior to Project construction and activities</p>	<p>Navy</p>
<p>MM-BIO-7- Impacts to Sensitive Insects</p>	<p>Due to suitable habitat within the Project site, within one year prior to vegetation removal and/or grading, a qualified entomologist familiar with the species behavior and life history should conduct surveys to determine the presence/absence of the insects listed above. Survey results, including negative findings, should be submitted to CDFW prior to implementing Project-related ground-disturbing activities. At minimum, a survey report should provide the following:</p> <p>a) A description and map of the survey area, focusing on areas that could provide suitable habitat. CDFW recommends the map show</p>	<p>Prior to Project construction and activities</p>	<p>Navy</p>

Mr. Jeffery Butts
Naval Base Ventura County
November 24, 2020
Page 12 of 12

	<p>surveyor(s) track lines to document that the entire site was covered during field surveys.</p> <ul style="list-style-type: none">b) Field survey conditions that should include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched.c) Map(s) showing the location of nests/colonies.d) A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, should include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).		
--	---	--	--