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Governor's Office of Planning & Research

July 28 2021

STATE CLEARINGHOUSE

July 27, 2021

Mrs. Angela Bonfiglio Allen
Ventura County Public Works – Watershed Protection
800 S. Victoria Avenue, Suite 1600
Ventura, CA 93009
Email: Angela.Bonfiglio@ventura.org

**Subject: Santa Clara River Levee Improvements Upstream of Highway 101 Project,
Notice of Preparation of a Draft Environmental Impact Report, SCH
2021060596, Ventura County Public Works – Watershed Protection**

Dear Mrs. Bonfiglio Allen:

The California Department of Fish and Wildlife (CDFW) has reviewed Ventura County Public Works – Watershed Protection's (County) Notice of Preparation (NOP) for the Santa Clara River Levee Improvements Upstream of Highway 101 (Project). Thank you for the opportunity to provide comments and recommendations regarding 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.

Conserving California's Wildlife Since 1870

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Project Description and Summary

Objective: The proposed Project consists of structural improvements to the existing SCR-1 levee to achieve compliance with the Federal Emergency Management Agency (FEMA) levee certification requirements, address structural deficiencies, design flood protection structures that can accommodate a future bikeway, and incorporate public education features. The proposed Project would improve flood protection to residents and businesses in the City of Oxnard located within the inundation area on the land side of SCR-1.

The proposed levee improvements would occur from Highway 101 along the existing SCR-1 levee system and continue northeast past the River Park community. At the Central Avenue Drain, the proposed alignment would deviate from the existing SCR-1 levee alignment and proceed southeast between the Central Avenue Drain on the south and United Water Conservation District's (UWCD) Spreading Grounds (Ferro Basin) on the north. Upon passing the Ferro Basin, the alignment would turn northeast along the eastern edge of Ferro Basin and enter agricultural fields before reaching high ground just short of East Vineyard Avenue. The Project activities, which are briefly detailed in the NOP, are described below:

UngROUTED Rock Riprap.

UngROUTED rock riprap at a 2:1 slope would be placed along the Central Avenue Drain segment from where the open channel transitions to a reinforced concrete pipe to the tie-in point/terminus (approximately 3,900 feet).

Concreted Rock.

The existing, deteriorated ungrouted-rock revetment levee face would be replaced with concreted rock on the existing river side slope underneath the Highway 101 bridge (approximately 425 feet). Existing grouted-rock riprap along the river side slope would be replaced with new concreted rock at a 2:1 slope, and at a 1:5 slope at the toedown depth (below grade). Proposed toedown depths along the levee range from approximately 30 to 35 feet below the riverside levee toe (the point at which the levee intersects with the ground). The toedown depth along the levee, after the open channel portion of Central Avenue Drain, would be approximately five feet.

Floodwall.

A floodwall (concrete retaining wall) would be constructed under Highway 101 on top of the existing levee for approximately 255 feet to allow the SCR-1 levee to meet the top of levee elevation requirements under the bridge soffit (ceiling under the bridge). The floodwall would be approximately three feet above the earthen embankment (the top of the floodwall would end approximately six inches below the Highway 101 soffit), 12-inches thick, and constructed of steel-reinforced concrete.

Soil Cement Revetment and Toedown.

North of Highway 101, approximately 2.3 miles of existing ungrouted rock riprap revetment would be removed and replaced with soil cement. The replacement soil cement would be sloped at a 1.5:1 ratio along the river side from north of Highway 101 to Central Avenue Drain. The land side would be sloped at 2:1 with compacted soil. Along the north Central Avenue Drain maintenance access road, where the Central Avenue Drain is currently an open channel. Soil cement would be sloped at a 1.5:1 slope facing UWCD's Ferro Basin (approximately 1,150 feet).

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Access Ramps and Levee Road.

Eight new access ramps would be constructed on the river side of the levee near existing ramps. Additionally, a new land side access ramp would be constructed near the Highway 101 bridge, allowing for the levee to connect with the City of Oxnard’s future bicycle path. All access to the levee and maintenance road would remain restricted to the public and would be secured by a new chain link fence and swing gates. Public access may be permitted after the City of Oxnard completes its Santa Clara River Trail (a schedule for the City’s trail development is currently undetermined).

Central Avenue Drain.

The existing Central Avenue Drain and its associated structures (inlet, outlet, flap gates, and double reinforced concrete pipes) would be removed and replaced to accommodate construction of the new levee segment.

Interior Drainage System.

All openings along the levee (e.g., storm drain outlets) would be provided with closure devices such as automatic flap gates, duckbill gates, or slide-type gates to prevent water from flowing back to the land side of the levee during a high flow event.

Vegetation Removal.

All vegetation within the temporary excavation area (necessary to construct the buried portion of the levee) would be removed prior to construction. Clearing and grubbing would be performed on a combination of vegetated areas and non-vegetated areas.

Location: The proposed Project is in unincorporated Ventura County and is generally along the southern bank of the Santa Clara River. The proposed improvements would occur along an approximately 2.8-mile stretch of the existing SCR-1 levee system from Highway 101 to the Central Avenue Drain. The levee would be extended by approximately 0.8 mile and would be added to the southeast segment along the Central Avenue Drain and north along the eastern edge of UWCD’s Ferro Basin.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying, avoiding, and/or mitigating the Project’s significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW looks forward to commenting on the Draft Environmental Impact Report (DEIR) when it is released. CDFW may have additional comments to the DEIR not addressed in this letter.

Specific Comments

- 1) Nesting Birds. Page six of the NOP states, “[t]he proposed project would include construction and operation activities adjacent to the Santa Clara River, which could result in significant impacts to common wildlife, nesting birds, special-status or rare wildlife species, and special-status plant species. Additionally, construction and [Operations & Maintenance] (O&M) could directly or indirectly impact jurisdictional waters, wetlands, Environmentally Sensitive Habitat Areas, Critical Habitat, and wildlife movement.” The proposed Project could potentially result in significant impacts to

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biological resources regarding riparian habitat or any other sensitive natural community provided protection under federal, State, and local laws, regulations, policies or plans.” Project activities, such as installing levee reinforcements, removing/replacing structures, and drainage system upgrades are likely to occur where birds may nest (e.g., trees, crevices in structures) and may impact nesting birds. Activities occurring during the breeding season of nesting birds could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment in trees or buildings directly adjacent to where construction would occur. Construction of new facilities or upgrades to existing facilities could also lead to the loss of nesting habitat for sensitive bird species.

- a) Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the MBTA).
 - b) CDFW recommends the DEIR provide measures to avoid impacts to nesting birds. Proposed Project activities including (but not limited to) staging; disturbances to vegetation, trees, and structures; demolition; grading; roofing; and fence or enclosure wall installation should not occur during the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that may be disturbed (as access to adjacent areas allows) and any other such habitat within 300-feet of the disturbance area (within 500-feet for raptors). All personnel and contractors working on site should be instructed on the sensitivity of areas where there are nesting birds. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
- 2) **Bats**. In urbanized areas, numerous bat species are known to roost in trees and structures throughout Ventura County. Bats may use trees (e.g., Mexican fan palm trees) and man-made structures (e.g., cracks and crevices in large concrete structures) for daytime and nighttime roosts. Western yellow bats (*Lasiurus xanthinus*) can be found year-round in urban areas throughout southern California.
- a) Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish and Game Code, § 4150, California Code of Regulations, § 251.1).
 - b) The DEIR should provide a thorough discussion and adequate disclosure of potential impacts to bats and roosts resulting from the proposed Project and activities including (but not limited to) staging; disturbances to vegetation, trees, and structures; demolition; grading; roofing; and fence or enclosure wall installation. The DEIR should provide bat-specific avoidance and mitigation measures which could minimize significant adverse impacts to bats, roosts, and maternity roosts (CEQA Guidelines, §15126.4[a][1]).

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3) Biological Baseline Assessment. As previously stated, and written in Page 6 of the NOP, the Project may result in significant impacts to sensitive biological resources. As such, the DEIR should provide a complete assessment and impact analysis of the flora and fauna within the Project area, with emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW considers impacts to Species of Special Concern and California Fully Protected Species a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. The DEIR should provide the following information:

- a) CDFW recommends the DEIR list each unique species occurring in the Project area instead of a total number by taxonomic group. For each species, please provide the species scientific (i.e., Latin) and common names; CESA and Federal Endangered Species Act listing status; and a brief evaluation of the potential for that species to occur in the Project area and be impacted by Project implementation. Presence of critical or suitable habitat (i.e. wintering, roosting, nesting, foraging) in the Project area should be addressed for each species where applicable.
- b) The DEIR should provide columns for each Element and approximate acres potentially impacted by critical habitat type. CDFW recommends using “None” or the number zero to indicate no impacts; and, provide a brief discussion why there would be no impacts to demonstrate that impacts were evaluated.
- c) The DEIR should include alternatives to fully avoid or otherwise protect special status species and their habitat from Project-related impacts. For unavoidable impacts, the DEIR should provide mitigation measures for each plant and wildlife species potentially impacted and their associated habitat which should include any wintering, roosting, nesting, and foraging habitat. See page eight for information about CESA/Incidental Take Permits and Compensatory Mitigation.
- d) 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), second edition (Sawyer 2008). CDFW only tracks rare natural communities using the MCV classification system, and considers vegetation communities, alliances, and associations ranked S1, S2, S3 and S4 as sensitive and declining at the local and regional level. CDFW considers these communities to be imperiled habitats having both local and regional significance. Additional information about these ranks can be obtained by visiting CDFW’s [Vegetation Classification and Mapping Program - Natural Communities](#) webpage.

The DEIR should provide the MCV-based names of all vegetation communities within the Project area. Vegetation classification should be performed by a

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qualified botanist with knowledge of southern California plants and vegetation communities.

- e) Page six of the NOP states, “the proposed Project would potentially result in significant impacts to biological resources including riparian habitat and other sensitive natural communities provided protection under federal, state, and local laws, regulations, policies or plans.” Vegetation communities based on the MCV classification should be presented in a table in the DEIR. The table should provide columns for each Element and approximate acres potentially impacted by vegetation community. CDFW recommends using “None” or the number zero to indicate no impacts; and provide a brief discussion why there would be no impacts to demonstrate that impacts were evaluated.

CDFW recommends the DEIR provide measures to fully avoid or otherwise protect sensitive vegetation communities from direct or indirect Project-related impacts. For unavoidable impacts, CDFW recommends the DEIR provide mitigation measures for each sensitive vegetation community potentially impacted. See page eight for information about Compensatory Mitigation.

- f) The Project may lead to direct or indirect impacts off-site (i.e., outside of the Project area). Therefore, adjoining habitat areas and areas immediately outside of the Project area should be included in assessments and mapping of special status plants, wildlife, habitat, and vegetation communities.
 - g) CDFW recommends revisiting all databases accessed during preparation of the NOP so any new data regarding special status plants, wildlife, and vegetation communities may be included in the DEIR. CDFW’s [California Natural Diversity Database](#)(CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat.
 - h) Presence/absence determinations of wildlife and rare plants in the Project area, specifically areas that would be impacted due to Project implementation (e.g., existing facilities), should be determined based on recent surveys. CDFW recommends the DEIR provide any recent survey data. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years.
- 4) Impacts to Riparian and Wetland Resources. As stated on page six of the NOP, the Project would potentially impact riparian and wetland habitats. Project construction and O&M activities may impact channels, ditches, and storm drains that carry water to adjacent riparian or wetland habitats. Furthermore, the Project would require. These changes may increase impervious surface cover adjacent to riparian and wetland habitats, causing changes to the amount, availability, and direction of water flow, and potentially increase the amount of runoff, sediment, debris, chemicals, and other pollutants transported into sensitive wetland areas.
- a) A final Table in the DEIR should include columns for each Element and approximate acres potentially impacted by habitat type. CDFW recommends

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using “None” or the number zero to indicate no impacts; and provide a brief discussion why there would be no impacts to demonstrate that impacts were evaluated.

- b) CDFW recommends the DEIR provide an approximate area of new pavement that would be created near sensitive wetland areas and evaluate potential direct and indirect impacts on riparian and wetland habitats.
 - c) CDFW recommends the DEIR provide alternatives to fully avoid or otherwise protect riparian and wetland resources from direct or indirect Project-related impacts that may include setback, permeable pavement, for example. Setbacks from wetland resources should start from the edge of herbaceous vegetation, woody vegetation, and woodlands. For unavoidable impacts, CDFW recommends the DEIR provide mitigation measures which may include on or off project site mitigation.
 - d) CDFW also recommends the DEIR be conditioned to include a statement acknowledging that Project or project-level impacts to wetland resources may require Lake Streambed Alteration (LSA) Agreement notification. See page nine for more information on Wetland Resources and LSA notification.
- 5) Landscaping. Landscaping was not included as a Project activity within the NOP, however, given the size and scope of the Project, CDFW offers the following comments in the case that landscaping activities are incorporated into the Project.
- a) Where landscaping would occur adjacent to sensitive natural communities, CDFW recommends the DEIR evaluate the possibility of incorporating setbacks to avoid and/or reduce impacts of landscaping on sensitive plants, wildlife, and habitats. Impacts may occur from spread of non-native species; plant material/stock carrying pests, pathogens, and diseases; and runoff contaminated with fertilizer applied to landscaped areas.
 - b) CDFW strongly recommends the DEIR consider a landscaping plant palette that includes a diversity of drought tolerant native plants, lawn grass alternatives, and plants that benefit and invite birds, beneficial insects, pollinators, and butterflies. See page 10 for additional information on landscaping and native plants. CDFW recommends the DEIR provide the Project’s landscaping plan for review and commenting. Species should be listed by growing duration (annual, perennial), life form (grasses, shrubs, trees, vines), and structure (ground cover, shrubs, tree canopy).
- 6) Impacts of Design Features and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, the DEIR should provide an impact analysis of proposed Project design features on biological resources, and a range of feasible alternatives to ensure that alternatives to design features are fully considered and evaluated (CEQA Guidelines, § 15126.6). Design features include (but not limited to) setbacks from sensitive natural areas; landscaping; permeable pavement; enclosures; fencing; solid walls; lighting; and building heights. Alternatives should avoid or otherwise minimize direct and indirect

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impacts to sensitive biological resources and wildlife movement areas.

General Comments

- 1) Environmental data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Public Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting [CNDDDB Field Survey Forms](#).
- 2) California Endangered Species Act (ESA). CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed rare plant species 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). Consequently, if the Project, Project-related construction, or any Project-related activity for the duration of the Project will result in take of a species designated as 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 or at an individual project-level. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project's CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the 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 a CESA ITP.
- 3) Compensatory Mitigation. The DEIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project-related 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 lead agency 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.
- 4) Lake Streambed Alteration (LSA) Agreement. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow; or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream; or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to CDFW

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pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether an LSA Agreement with the applicant is required prior to conducting the proposed activities. CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require related environmental compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document prepared by Ventura County Public Works for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the DEIR 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 Agreement.

- a) The Project area supports aquatic, riparian, and wetland habitats; therefore, therefore, a preliminary jurisdictional delineation of the streams and their associated riparian habitats should be included in the DEIR. Jurisdiction 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. Also, the delineation should be conducted pursuant to the United States Fish and Wildlife Service (USFWS) wetland definition adopted by the CDFW (Cowardian 1970). Some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' section 404 permit and Regional Water Quality Control Board section 401 Certification.
- b) In areas of the Project area which may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately sized vegetated buffer areas adjoining ephemeral drainages.
- c) Project-related changes in drainage patterns, runoff, and sedimentation should be included and evaluated in the DEIR.

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist Ventura County Public Works in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Baron Barrera, Environmental Scientist, at Baron.Barrera@wildlife.ca.gov.

Sincerely,

DocuSigned by:

Erinn Wilson-Olgin

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References

Cowardin, Lewis M., et al. 1970. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

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