



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

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GAVIN NEWSOM, Governor
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Governor's Office of Planning & Research

November 17, 2021

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STATE CLEARINGHOUSE

Mr. Andrew Grubb
City of Camarillo
601 Carmen Drive
Camarillo, CA 93010
Email: AGrubb@CityofCamarillo.org

Subject: Dizdar Park Renovation and Expansion Project, Notice of Preparation of a Draft Program Environmental Impact Report, SCH #2021100259, City of Camarillo, Ventura County

Dear Mr. Grubb:

The California Department of Fish and Wildlife (CDFW) has reviewed the City of Camarillo's (City) Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Dizdar Park Renovation and Expansion 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 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 involves demolition of a former fire station, demolition of a vacant office building, and the renovation and expansion of Dizdar Park. The park would include a new pergola, playground, band shell, sitting garden, picnic area, bathrooms, parking lot, and new paved pathways throughout the 1.7-acre project site. The project would include removal of the existing fire station's asphalt driveway and existing landscape in the southern portion of the Project site. An asphalt parking lot would be constructed and would include approximately 20 standard parking spaces.

Location: The Project is located within the City of Camarillo in Ventura County. The site proposed for the Project is a 1.7-acre area located at the southeastern corner of the intersection of Ventura Boulevard and South Glenn Drive. The site includes Dizdar Park, a former fire station at 2474 Ventura Boulevard, and the vacant office building at 2402 Ventura Boulevard.

COMMENTS AND RECOMMENDATIONS

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

Specific Comments

- 1) Landscaping. Expansion and renovation of Dizdar Park likely includes vegetative landscaping. If vegetative landscaping is including in the Project, CDFW recommends the City consider the following:
 - a) CDFW strongly recommends the City 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 **General Comments** below for additional information on landscaping and native plants. CDFW recommends the DEIR include 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).
- 2) Impacts of Design Features and Alternatives. To enable CDFW to adequately review and comment on the proposed Project, the DEIR should provide an impact analysis of proposed design features on biological resources and a range of feasible alternatives that are fully considered and evaluated (CEQA Guidelines, § 15126.6). Design features described in the DEIR should include (but not limited to) landscaping; permeable pavement; enclosures; fencing; solid walls; lighting; and building heights. Alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.

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General Comments

Landscaping. Habitat loss and invasive plants are a leading cause of native biodiversity loss. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. CDFW recommends the City avoid planting, seeding, or introducing invasive exotic plant species to landscaped areas. Invasive/exotic plants should be restricted from use in landscape plans for all actions associated with this Project. The California Invasive Plant Council (Cal-IPC) provides a Cal-IPC Inventory (<https://www.cal-ipc.org/plants/inventory/>) of non-native and invasive plants that threaten the State's natural areas. CDFW strongly recommends restricting species with a "High" rating from landscaping plans.

Information on alternatives for invasive, non-native, or landscaping plants may be found on the Cal-IPC's, Don't Plant a Pest (<https://www.cal-ipc.org/solutions/prevention/landscaping/dpp/>) webpage. Native plants could help to reduce water consumption and use of fertilizers. The Audubon Society's Native Plants Database (<https://www.audubon.org/native-plants>) is a resource to identify native plants and trees that will attract and benefit birds. Birds may help to control and reduce insects, reducing the need for pesticides. The California Native Plant Society's Gardening (<https://www.cnps.org/gardening>) and Xerces Society's Pollinator-Friendly Native Plant Lists (<https://xerces.org/pollinator-conservation/pollinator-friendly-plant-lists>) webpage has information on native plant species that invite insects and pollinators. Pollinators are critical components of our environment and essential to our food security. Insects – and primarily bees – provide the indispensable service of pollination to more than 85% of flowering plants.

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the City in identifying and mitigating the Project's potential 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:


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Erinn Wilson-Olgin
Environmental Program Manager I
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