



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

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May 24 2022

STATE CLEARINGHOUSE

May 24, 2022

Ms. Kristina Boero
Ventura County
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Subject: Major Modification to Conditional Use Permit No. 3048, Mitigated Negative Declaration, SCH No. 2022040478; City of Ojai, Ventura County

Dear Ms. Boero:

The California Department of Fish and Wildlife (CDFW) has reviewed the Ventura County's (County) Mitigated Negative Declaration (MND) for the Major Modification to Conditional Use Permit No. 3048 (Project). The County, as Lead Agency, prepared a MND pursuant to the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 et. seq.) with the purpose of informing decision-makers and the public regarding potential environmental effects related to the 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 or be subject to Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust for the people of the state [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Pub. 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). CDFW is also directed to provide 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.). To the extent implementation of the Project as proposed may result in "take" 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 enhance the facilities, play areas, trails, utilities, and landscaping at Camp Ramah (Camp). The Project includes the following activities:

Cabins and Structures

The proposed project will erect six new cabins, four of which will be two stories, and a central gathering structure. This expansion will result in 10,609 square feet of development over one acre of land. The project footprint was consciously chosen due to the lack of vegetation which burned in the 2017 Thomas fire. A retaining wall will be built around the structures and vary between six and eight feet in height.

Road Renovations

An existing secondary-access road along the western property line will be extended to provide access to the new cabin structures. Additionally, the existing driveway will be widened, resulting in the removal and encroachment of several coast live oaks.

Exterior Lighting

The Project has proposed that lighting fixtures would be limited to the number of necessary to illuminate the area for safety. Within the MND it states the fixtures will be positioned so that it would not affect adjacent uses by spilling onto into nearby open space and would be shielded to direct light. The lowest possible wattage will be used.

Grading and Construction

Grading and other construction activities involving heavy equipment shall be timed to occur between July 1 and March 1 to avoid potential impacts to nesting birds. The applicant shall submit the site plan and grading plans with the locations of the fencing to the Planning Division for review and approval prior to the issuance of a Zoning Clearance for construction. A qualified biologist shall direct the initial site clearing.

Conditional Use Permit (CUP) Extension

The project will also include an extension of the Conditional Use Permit (CUP) boundary, expanding the property from 83.45 acres to 431.45 acres. These parcels are undeveloped and are vacant open space land with public trails that are part of the Los Padres National Forest trail system. No structures or vegetation removal is proposed on these parcels.

Location: The project site is located at 385 Fairview Road approximately 0.32 miles west of the City of Ojai in the unincorporated area of Ventura County. Surrounding land uses include natural open space, agriculture, and scattered residences.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the County in adequately identifying, avoiding, and/or mitigating significant, or potentially significant, direct and indirect impacts on fish and wildlife biological resources based on the planned activities of this proposed Project. CDFW recommends the measures below be included in a science-based monitoring program with adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, §

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15097). Additional comments or other suggestions may also be included to improve the document.

Specific Comments

Comment #1: Impacts to Sensitive Plant Communities and Special-Status Plant Species

Issue: It is unclear if the project will impact sensitive plants and sensitive plant communities. The most recent botanical surveys were conducted in 2017. Without more current surveys the Project may result in a significant impact to special-status plants/communities. Mitigation measures and ratios for ranked sensitive vegetation communities including S4 and S5 should be provided for the proposed Project impacts if present.

Specific impact: Following the Thomas fire in 2017, it is unclear if the plant communities which were previously present have since repopulated. The vegetation communities found within the Project footprint and the surrounding area prior to the fire provided important foraging and nesting areas for a variety of special status species. Development of the area and thinning of vegetation for fuel modification will result in the loss of resources. Rare plants within 1,000 meters from these activities are considered impacted.

Why impact would occur: A nine-quad review of the California Natural Diversity Database (CNDDDB) revealed several special status plants that have potential to occur in the geographical area(s). Although multiple focus surveys have been conducted at the Project site the most recent botanical surveys occurred in 2017, before the Thomas Fire. A general survey was done in 2018, but mainly functioned to address the altered conditions following the fire event. Thus, 2017 observations may not be representative of current conditions. Rare plants/communities may have established in the Project site since the 2017/2018 surveys. Presence/absence determinations of 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 generally considers biological field assessments for rare plants valid for a period of up to three years.

Rare plants may have established in the Project site post-fire and have since been undetected. Burned habitat does not decline in value or importance by default of being burned. Given time, burned habitat is expected to successional progress back to the pre-burn vegetation community. The burned habitat still contains all of the vegetation species that occurred pre-fire, in the form of 1) embryos (seed bank) or 2) basal burls or roots that allow for resprouting of vegetation. Project construction and activities such as vegetation clearing, operating large equipment (e.g., loaders, dozers, drilling rigs, and cranes), and ground disturbance (e.g., staging, access, grading, excavating, drilling) may have direct impacts on sensitive or special status plant species and indirect impacts by modifying or removing habitat (Coop et al. 2020).

The following ranked vegetation classifications were found within or near the project footprint prior to the Thomas Fire: Coast live oak (*Quercus agrifolia*) woodland alliance (S4), bush mallow (*Malacothamus fasciculatus*) shrubland alliance (S4), and mulefat (*Baccharis saluicifolia*) scrub alliance (S4). The MND states a combined 1.17 acres of these sensitive vegetation communities were impacted by the Thomas fire and emergency fire operations.

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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 a Project(s) 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 & Wildlife Service (USFWS). 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. Mitigation measures and replacement ratios should be provided for ranked vegetation communities if present.

Take of CESA-listed rare plants may only be permitted through an incidental take permit (ITP) or other authorization issued by pursuant to California Code of Regulations, Title 14, section, 786.9 subdivision (b). CDFW is concerned the loss of CESA-listed rare plants may occur if appropriate avoidance, minimization, and/or mitigation for these species is not adopted.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends resurveying the project footprint and fuel modification area to produce a revised plant communities map. Vegetation surveys should be conducted following systematic field techniques outlined by CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFWa 2018). To determine the rarity ranking of vegetation communities on a specific Project site(s), CDFW utilizes vegetation descriptions found in the *Manual of California Vegetation* (MCV). The MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system (found online at <http://vegetation.cnps.org/>). CDFW recommends the environmental document provide measures to fully mitigate the loss of individual Endangered Species Act (ESA)- and CESA-listed plants and habitat.

1. The MND should provide a map showing which plants or populations will be impacted and provide a table that clearly documents the number of plants and acres of supporting habitat impacted, and plant composition (e.g., density, cover, abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, abundance of each species).
2. The MND should provide species-specific measures for on-site mitigation. Each species-specific mitigation plan should adopt an ecosystem-based approach and be of sufficient detail and resolution to describe the following at a minimum: 1) identify the impact and level of impact (e.g., acres or individual plants/habitat impacted); 2) location of onsite mitigation and adequacy of the location(s) to serve as mitigation; 3) assessment of appropriate reference sites; 4) scientific [genus and species (subspecies/variety if applicable)] of plants being used for restoration; 5) location(s) of propagule source; 6) species-specific planting methods (i.e., container or seed); 7) measurable goals and

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success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover); 8) long-term monitoring, and; 9) adaptive management techniques.

Additionally, considerations should be made regarding timing of these field surveys to ensure accuracy in determining what plants exist on site. Adequate information about special status plants and natural communities present in a project area will enable reviewing agencies and the public to effectively assess potential impacts to special status plants or natural communities and will guide the development of minimization and mitigation measures (CDFW 2018).

Mitigation Measure #2: If rare or sensitive plants are found on or near the footprint of the Project, the MND should provide species-specific measures to fully avoid impacts to all ESA- and CESA-listed plants. This may include flagging all plants and/or perimeter of populations; no work buffers around plants and/or populations (e.g., flagged perimeter plus 50 feet); restrictions on ground disturbing activities within protected areas; relocation of staging and other material piling areas away from protected areas; restrictions on herbicide use and/or type of herbicide and/or application method within 100 feet of sensitive plants; and worker education and training.

Mitigation Measure #3: If rare or sensitive plants/communities are impacted on or near the footprint of the Project, CDFW recommends the MND provide measures to fully mitigate the loss of individual ESA- and CESA-listed plants and habitat. The Project proponent should mitigate at a ratio sufficient to achieve a no-net loss for impacts to special status plant species and their associated habitat. This should be for the number of plants replaced to number impacted, including acres of habitat created to acres of habitat impacted. CDFW recommends all impacts to S4 communities (*Quercus agrifolia* woodland alliance, *Malacothamus fasciculatus* shrubland alliance, and *Baccharis saluicifolia* scrub alliance) be mitigate at a minimum 3:1 ratio. Rare plants are habitat specialists that require specific conditions to persist such as vegetation composition (species abundance, diversity, cover), soils, substrate, slope, hydrology, and pollinators.

Mitigation Measure #4: All revegetation/restoration areas that will serve as mitigation should include preparation of a restoration plan (Plan), to be approved by 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 for long-term management. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968). The Plan should provide species-specific measures for on-site mitigation. Each species-specific mitigation plan should adopt an ecosystem-based approach and be of sufficient detail and resolution to describe the following at a minimum: 1) identify the impact and level of impact (e.g., acres or individual plants/habitat impacted); 2) location of onsite mitigation and adequacy of the location(s) to serve as mitigation; 3) assessment of appropriate reference sites; 4) scientific [Genus and species (subspecies/variety if applicable)] of plants being used for restoration; 5) location(s) of propagule source; 6) species-specific planting methods (i.e., container or seed); 7) measurable goals and success criteria for establishing self-sustaining populations (e.g. percent survival rate, absolute cover); 8) long-term monitoring, and; 9) adaptive management techniques.

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Mitigation Measure #5: Success criteria should be based on the specific composition of the vegetation communities being impacted. Success should not be determined until the site has been irrigation-free for at least 5 years and the metrics for success have remained stable (no negative trend for richness/diversity/abundance/cover and no positive trend for invasive/non-native cover for each vegetation layer) for at least 5 years. In the revegetation plan, the success criteria should be compared against an appropriate reference site, with the same vegetation alliance, with as good or better-quality habitat. The success criteria should include percent cover (both basal and vegetative), species diversity, density, abundance, and any other measures of success deemed appropriate by CDFW. Success criteria should be separated into vegetative layers (tree, shrub, grass, and forb) for each alliance being mitigated, and each layer should be compared to the success criteria of the reference site, as well as the alliance criteria in MCV ensuring one species or layer does not disproportionately dominate a site but conditions mimic the reference site and meets the alliance membership requirements.

CDFW does not recommend topsoil salvage or transplantation as viable mitigation options. Several studies have documented topsoil salvage had no effect on the recolonization of the target plant species (Hinshaw 1998). Based on the scientific literature available, relying on topsoil salvage alone to mitigate impacts to CEQA-rare plant species does not appear to provide any value to mitigate impacts to the plant.

Comment #2: Mountain Lion (*Puma concolor*)

Issue: The Project may impact mountain lion (*Puma concolor*), the Project lies within recorded mountain lion habitat.

Specific impacts: Project activities may impact mountain lion population by increasing human presence, traffic, noise, air pollutants and dust, and artificial lighting.

Why impacts would occur: Mountain lions may occur within areas immediately adjacent to the Project. The Project may increase human presence (e.g., new development, public trail access, traffic, noise, and artificial lighting) during Project construction and over the life of the Project. Mountain lions are exceptionally vulnerable to human disturbance (Lucas 2020). As human population density increases, the probability of mountain lion persistence decreases (Woodroffe 2000). Most factors affecting the ability of the southern California mountain lion populations to survive and reproduce are caused by humans (Yap et al. 2019). As California has continued to grow in human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFWb 2013). As a result, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety. Areas of high human activity have lower occupancy of rare carnivores. Mountain lions avoid areas with low woody vegetation cover and artificial outdoor lighting (Beir 1995). Mountain lions tend to avoid roads and trails regardless of how much they are used (Lucas 2020). Increased traffic could cause vehicle strikes. Loss of wildlife connectivity is another primary driver for the potential demise of the southern California mountain lion population (Yap et al. 2019). Habitat loss and fragmentation due to roads and development has driven the southern California mountain lion population towards extinction (Yap et al. 2019). Conserving and restoring habitat connectivity and corridors is essential for mitigating impacts to mountain lions. This is especially critical in the face of climate change-driven habitat loss and increased frequency of fires (Yap et al. 2019). Under a high emissions and warm and wet climate scenario, much of the chaparral habitat in southern California that

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provide habitat for mountain lions would be climactically highly stressed by the year 2070 (Thorne et al. 2016).

Evidence impact would be significant: The mountain lion is a specially protected mammal in the State (Fish and Game Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list an evolutionarily significant unit (ESU) of mountain lion in southern and central coastal California as threatened under CESA (CDFWc 2020). As a CESA-candidate species, the mountain lion in southern California is granted full protection of a threatened species under CESA.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Due to potential habitat near the Project footprint, a CDFW-approved biologist knowledgeable of mountain lion species ecology should survey areas that may provide habitat for mountain lion natal dens. This should be performed within one year of Project implementation, including site preparation, equipment staging, and mobilization. Caves and other natural cavities and thickets of brush and timber provide cover and are used for denning. Females may be in estrus at any time of the year, but in California, most births probably occur in spring. Survey results, including negative findings, should be submitted to CDFW prior to Project implementation. The survey report should include a map of potential denning sites. The survey report should also include measures to avoid impacts to dens and cubs if necessary.

Mitigation Measure #2: If potential habitat for natal dens is identified, CDFW recommends fully avoiding potential impacts to mountain lions, especially during spring, to protect vulnerable cubs. Two weeks prior to Project implementation, and once a week during construction activities, a CDFW-approved biologist should conduct a survey for mountain lion natal dens. The survey area should include the construction footprint and the area within 2,000 feet (or the limits of the property line) of the Project disturbance boundaries. CDFW should be notified within 24 hours upon location of a natal den. If an active natal den is located, during construction activities, all work should cease. No work should occur within a 2,000-foot buffer from a natal den. A qualified biologist should notify CDFW to determine the appropriate course of action. CDFW should also be consulted to determine an appropriate setback from the natal den that would not adversely affect the successful rearing of the cubs. No construction activities or human intrusion should occur within the established setback until mountain lion cubs have been successfully reared; the mountain lions have left the area; or as determined in consultation with CDFW.

Mitigation Measure #3: If “take” or adverse impacts to mountain lion cannot be avoided either during Project construction and, over the life of the Project, the County must consult with CDFW to determine if a CESA ITP is required (pursuant to Fish & Game Code, § 2080 *et seq.*).

Recommendation #1: CDFW recommends the County evaluate the mountain lion territory size and use of habitat within and surrounding the Project vicinity. The County should analyze the change (i.e., increase) in human presence and area of anthropogenic influence that will now be in mountain lion habitat and how it may impact mountain lion behavior, reproductive viability, and overall survival success. Based on these known anthropogenic impacts on mountain lions, CDFW also recommends the County provide compensatory mitigation for impacts to mountain lion. The CEQA document should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant.

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Comment #3: Impacts to Nesting Birds

Issue: The proposed Project may impact special status bird species. Buffer zones proposed for nesting passerine and raptor species within the MND need to be increased to reduce impacts.

Specific impacts: Ground-clearing, and construction activities could lead to the direct mortality of a listed species or species of special concern. The loss of occupied habitat could yield a loss of foraging potential, nesting sites, roosting sites, or refugia and would constitute a significant impact if absent of appropriate mitigation.

Why impacts would occur: The proposed Project may impact special status bird species. As such, we recommend including special-status protocol survey language as avoidance, minimization and/or mitigation measure(s). A lack of protocol surveys will likely lead to impacts to a variety of sensitive species. Protocol surveys are necessary to identify listed species and supporting habitat necessary for their survival.

Evidence impact would be significant: CDFW considers impacts to CESA-listed and Species of Special Concern (SSC) a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures.

The following mitigation measures are suggested by CDFW for impacts to nesting birds:

Mitigation Measure #1: To protect nesting passerine birds that may occur on-site, CDFW recommends that no construction should occur from February 1 through September 15. If construction is unavoidable during February 1 through September 15, surveys should be conducted for nesting bird activity within 7 days prior to Project activities that occur. The surveys should be conducted by a qualified biologist to determine if active bird nests of special status bird species. Surveys will occur in the construction zone and within 500 feet of the site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites.

Mitigation Measure #2: If any nests of passerine birds are observed, these nests should be designated an ecologically sensitive area and protected (while occupied) by a minimum 300-foot radius during project construction. If active nests are found, all construction must be postponed or halted until the biologist determined the nest is vacated, juveniles have fledged, and no evidence of a second nesting attempt is observed. The biologist should serve as a construction monitor during periods of construction occur near the active nest areas to ensure that no inadvertent impacts occur.

The following mitigation measures are suggested by CDFW for impacts to raptors:

Mitigation Measure #1: To protect nesting raptors that may occur on site, CDFW recommends that the final environmental document include a measure that no construction should occur from January 1 through September 15. If construction is unavoidable during January 1 through September 15, a qualified biologist should complete surveys for nesting bird activity the orders *Falconiformes* and *Strigiformes* (raptors and owls) within a 500-foot radius of the construction site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. If any nests of birds of prey are observed, these

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nests should be designated an ecologically sensitive area and protected (while occupied) by a minimum 500-foot radius during project construction. Pursuant to FGC Sections 3503 and 3503.5, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird or bird-of-prey.

Mitigation Measure #2: CDFW cannot authorize the take of any fully protected species as defined by state law. State fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for its take except for collecting those species for necessary scientific research and relocation of the bird species for protection of livestock (Fish & G. Code, §§ 3511, 4700, 5050, 5515). CDFW has advised the Permittee that take of any species designated as fully protected under the Fish and Game Code is prohibited. CDFW recognizes that certain fully-protected species are documented to occur on, or in, the vicinity of the Project area, or that such species have some potential to occur on, or in, the vicinity of Project, due to the presence of suitable habitat.

Comment #4: Impacts to Bat Species

Issue: The Project may impact the pallid bat (*Antrozous pallidus*), western red bat (*Lasiurus blossevillii*), the hoary bat (*Lasiurus cinereus*), Townsend's big-eared bat (*Corynorhinus townsendii*), and the long-legged bat (*Myotis volans*). The majority of which are SSC.

Specific impacts: The project as proposed includes direct impacts to bats such as removal of trees, vegetation, and/or structures that may provide roosting habitat. These activities have potential to result in direct loss of bats.

Why impacts would occur: Mature-riparian trees and crevices in buildings and facilities in the Project site could provide roosting habitat for bats. Species such as the pallid bat are well known to use man-made structures to roost. While the western red bat and hoary bat are a documented obligate tree roosting species. Removal of these structures without appropriate surveys could lead to direct mortality. Likewise, 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). 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 using man-made structures or surrounding trees as roost sites. Although temporary, such disturbance can lead to the abandonment of a maternity roost (Johnston et al. 2004). Likewise, grassland, woodland, and scrub habitats will be impacted by development, grading, and fuel modification. These habitats could be utilized for foraging by the Townsend's big-eared bat and the long-legged bat.

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 County (CEQA Guidelines, § 15065).

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Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends a qualified bat specialist conduct bat roosting surveys within the Project site and a 200-foot buffer to locate potential bat roosting sites. These assessments will determine baseline conditions of potential roosting areas present throughout the study area 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.

Mitigation Measure #2: To prevent project delays and possible “take,” CDFW also recommends nighttime emergence surveys of day roosts during seasons when bats are most mobile (April 1 to September 30). Emergence surveys should be performed shortly after dusk to identify any bats that emerge from a potential roost site. CDFW recommends using acoustic recognition technology to maximize detection of bats. 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).

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).

Mitigation Measure #3: If maternity roosts are found, CDFW recommends, the following mitigation measures-

1. If maternity roosts are found, to the extent feasible, work should 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).
2. If maternity roosts are found and if trees and/or structures must be removed/demolished during the maternity season, a qualified bat specialist should 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 should 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 should be left in place until the end of the maternity season. Work should not occur within 100 feet of or directly under or adjacent to an active roost and work should not occur between 30 minutes before sunset and 30 minutes after sunrise.
3. If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year, trees will be removed using the two-step removal method. Segments of the tree which do not offer any roosting habitat will be removed using a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees should be pushed lightly with heavy machinery two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be left in place for at least a 24-hour period and inspected by a bat

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specialist. Trees that are known to be bat roosts should not be bucked or mulched immediately. A period of at least 24 hours, and preferably 48 hours, should elapse prior to such operations to allow bats to escape. Bats should be allowed to escape prior to demolition of buildings. This may be accomplished by using lights, fans, and placing one-way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building.

Mitigation Measure #5: If roosting habitat is available but absence is confirmed following appropriate focus-surveys CDFW recommends removing potential roosting habitat during winter months (November 1-January 31). Removal of habitat where bats have been determined to be absent will prevent future occupation in the area. Bats move roosting locations frequently based on need or seasonal changes. Habitat that is not occupied may become so in a matter of days, to weeks, to months, to years.

Comment #5: Impacts to Non-Game Mammals and Wildlife

Issue: 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 on the Project site 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 on site. 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 should 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 should also be minimized so as not to restrict free wildlife movement through habitat areas. CDFW recommends the County consider permeable fencing as part of its mitigation for Project-related impacts. 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 (<https://planning.lacounty.gov/site/sea/wp-content/uploads/2020/02/SEA-IG-2-6-20.pdf>) offers additional information on permeable fencing as well as design standards. CDFW recommends reviewing those design standards.

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Mitigation Measure #2: To avoid direct mortality, a qualified biological monitor should 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 should 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 should be done to avoid islands of habitat where wildlife may take refuge and later be killed by heavy equipment. Grubbing and grading should be done from the center of the Project site, working outward towards adjacent habitat off site where wildlife may safely escape.

Additional Recommendations

Fuel Modification. If the Project includes fuel modification, CDFW recommends that the final environmental include avoidance and mitigation measures for any fuel modification activities conducted within and adjacent to the Project area. A weed management plan should be developed for all areas adjacent to open space that will be subject to fuel modification disturbance. CDFW also recommends that any irrigation proposed in fuel modification zones drain back into the development and not onto natural habitat land as perennial sources of water allow for the introduction of invasive Argentine ants.

Mitigation and Monitoring Reporting Plan. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the County with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan. A final MMRP should reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

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 County 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 & G. Code, § 711.4; Pub. Resources Code, § 21089).

Conclusion

We appreciate the opportunity to comment on the Project to assist the County in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the County 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 Angela Castanon, Environmental Scientist, at Angela.Castanon@wildlife.ca.gov.

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Sincerely,

DocuSigned by:

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Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW

Steve Gibson, Los Alamitos – Steve.Gibson@wildlife.ca.gov
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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. A final MMRP should reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-1- Impacts to Special-status Plants/Plant Communities	<p>CDFW recommends resurveying the project footprint and fuel modification area to produce a revised plant communities map. Vegetation surveys should be conducted following systematic field techniques outlined by CDFW's <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities</i> (CDFW 2018). To determine the rarity ranking of vegetation communities on a specific Project site(s), CDFW utilizes vegetation descriptions found in the MCV. The MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system (found online at http://vegetation.cnps.org/). CDFW recommends the environmental document provide measures to fully mitigate the loss of individual ESA- and CESA-listed plants and habitat.</p> <ol style="list-style-type: none"> The MND should provide a map showing which plants or populations will be impacted and provide a table that clearly documents the number of plants and acres of supporting habitat impacted, and plant composition (e.g., density, cover, abundance) within impacted habitat (e.g., species 	Prior to Project construction and activities	County of Ventura/ Applicant

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	<p>list separated by vegetation class; density, cover, abundance of each species).</p> <p>2. The MND should provide species-specific measures for on-site mitigation. Each species-specific mitigation plan should adopt an ecosystem-based approach and be of sufficient detail and resolution to describe the following at a minimum: 1) identify the impact and level of impact (e.g., acres or individual plants/habitat impacted); 2) location of onsite mitigation and adequacy of the location(s) to serve as mitigation; 3) assessment of appropriate reference sites; 4) scientific [genus and species (subspecies/variety if applicable)] of plants being used for restoration; 5) location(s) of propagule source; 6) species-specific planting methods (i.e., container or seed); 7) measurable goals and success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover); 8) long-term monitoring, and; 9) adaptive management techniques.</p> <p>Additionally, considerations should be made regarding timing of these field surveys to ensure accuracy in determining what plants exist on site. Adequate information about special status plants and natural communities present in a project area will enable reviewing agencies and the public to effectively assess potential impacts to special status plants or natural communities and will guide the development of minimization and mitigation measures (CDFW 2018).</p>		
<p>MM-BIO-2- Impacts to Special-status</p>	<p>If rare or sensitive plants are found on or near the footprint of the Project, the MND should provide species-specific measures to fully avoid impacts to all ESA and CESA-listed plants. This may include flagging all plants and/or perimeter of populations; no work buffers around plants and/or populations (e.g., flagged perimeter plus 50</p>	<p>Prior to/ During construction and activities</p>	

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Plants/Plant Communities	feet); restrictions on ground disturbing activities within protected areas; relocation of staging and other material piling areas away from protected areas; restrictions on herbicide use and/or type of herbicide and/or application method within 100 feet of sensitive plants; and worker education and training.		
MM-BIO-3- Impacts to Special-status Plants/Plant Communities	If rare or sensitive plants/communities are impacted on or near the footprint of the Project, CDFW recommends the MND provide measures to fully mitigate the loss of individual ESA- and CESA-listed plants and habitat. The Project proponent should mitigate at a ratio sufficient to achieve a no-net loss for impacts to special status plant species and their associated habitat. This should be for the number of plants replaced to number impacted, including acres of habitat created to acres of habitat impacted. CDFW recommends all impacts to S4 communities (<i>Quercus agrifolia</i> woodland alliance, <i>Malacothamus fasciculatus</i> shrubland alliance, and <i>Baccharis saluicifolia</i> scrub alliance) be mitigate at a minimum 3:1 ratio. Rare plants are habitat specialists that require specific conditions to persist such as vegetation composition (species abundance, diversity, cover), soils, substrate, slope, hydrology, and pollinators.	Prior to Project construction and activities	County of Ventura/ Applicant
MM-BIO-4- Impacts to Special-status Plants/Plant Communities	All revegetation/restoration areas that will serve as mitigation should include preparation of a restoration plan (Plan), to be approved by 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 for long-term management. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968). The Plan should provide species-specific measures for on-site mitigation. Each species-specific mitigation plan should adopt an ecosystem-based approach and be of sufficient detail and resolution to describe the	Prior to Project construction and activities	County of Ventura/ Applicant

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	<p>following at a minimum: 1) identify the impact and level of impact (e.g., acres or individual plants/habitat impacted); 2) location of onsite mitigation and adequacy of the location(s) to serve as mitigation; 3) assessment of appropriate reference sites; 4) scientific [Genus and species (subspecies/variety if applicable)] of plants being used for restoration; 5) location(s) of propagule source; 6) species-specific planting methods (i.e., container or seed); 7) measurable goals and success criteria for establishing self-sustaining populations (e.g. percent survival rate, absolute cover); 8) long-term monitoring, and; 9) adaptive management techniques.</p>		
<p>MM-BIO-5- Impacts to Special-status Plants/Plant Communities</p>	<p>Success criteria should be based on the specific composition of the vegetation communities being impacted. Success should not be determined until the site has been irrigation-free for at least 5 years and the metrics for success have remained stable (no negative trend for richness/diversity/abundance/cover and no positive trend for invasive/non-native cover for each vegetation layer) for at least 5 years. In the revegetation plan, the success criteria should be compared against an appropriate reference site, with the same vegetation alliance, with as good or better-quality habitat. The success criteria should include percent cover (both basal and vegetative), species diversity, density, abundance, and any other measures of success deemed appropriate by CDFW. Success criteria should be separated into vegetative layers (tree, shrub, grass, and forb) for each alliance being mitigated, and each layer should be compared to the success criteria of the reference site, as well as the alliance criteria in MCV ensuring one species or layer does not disproportionately dominate a site but conditions mimic the reference site and meets the alliance membership requirements.</p> <p>CDFW does not recommend topsoil salvage or transplantation as viable mitigation options. Several studies have documented topsoil</p>	<p>Prior to/ During/ After Project construction and activities</p>	<p>County of Ventura/ Applicant</p>

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	<p>salvage had no effect on the recolonization of the target plant species (Hinshaw 1998). Based on the scientific literature available, relying on topsoil salvage alone to mitigate impacts to CEQA-rare plant species does not appear to provide any value to mitigate impacts to the plant.</p>		
<p>MM-BIO-6- Impacts to Mountain Lion</p>	<p>Due to potential habitat near the Project footprint, a CDFW-approved biologist knowledgeable of mountain lion species ecology should survey areas that may provide habitat for mountain lion natal dens. This should be performed within one year of Project implementation, including site preparation, equipment staging, and mobilization. Caves and other natural cavities and thickets of brush and timber provide cover and are used for denning. Females may be in estrus at any time of the year, but in California, most births probably occur in spring. Survey results, including negative findings, should be submitted to CDFW prior to Project implementation. The survey report should include a map of potential denning sites. The survey report should also include measures to avoid impacts to dens and cubs if necessary.</p>	<p>Prior to Project construction and activities</p>	<p>County of Ventura/ Applicant</p>
<p>MM-BIO-7- Impacts to Mountain Lion</p>	<p>If potential habitat for natal dens is identified, CDFW recommends fully avoiding potential impacts to mountain lions, especially during spring, to protect vulnerable cubs. Two weeks prior to Project implementation, and once a week during construction activities, a CDFW-approved biologist should conduct a survey for mountain lion natal dens. The survey area should include the construction footprint and the area within 2,000 feet (or the limits of the property line) of the Project disturbance boundaries. CDFW should be notified within 24 hours upon location of a natal den. If an active natal den is located, during construction activities, all work should cease. No work should occur within a 2,000-foot buffer from a natal den. A qualified biologist should notify CDFW to determine the appropriate course of action. CDFW should also be consulted to determine an appropriate setback from the natal den that would not adversely affect the successful rearing of the cubs. No construction activities or human intrusion should occur within the</p>	<p>Prior to Project construction and activities</p>	<p>County of Ventura/ Applicant</p>

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	established setback until mountain lion cubs have been successfully reared; the mountain lions have left the area; or as determined in consultation with CDFW.		
MM-BIO-8- Impacts to Mountain Lion	If “take” or adverse impacts to mountain lion cannot be avoided either during Project construction and, over the life of the Project, the County must consult with CDFW to determine if a CESA ITP is required (pursuant to Fish & Game Code, § 2080 <i>et seq.</i>).	Prior to Project construction and activities	County of Ventura/ Applicant
MM-BIO-9- Impacts to Nesting Birds	To protect nesting passerine birds that may occur on-site, CDFW recommends that no construction should occur from February 1 through September 15. If construction is unavoidable during February 1 through September 15, surveys should be conducted for nesting bird activity within 7 days prior to Project activities that occur. The surveys should be conducted by a qualified biologist to determine if active bird nests of special status bird species. Surveys will occur in the construction zone and within 500 feet of the site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites.	Prior to Project construction and activities	County of Ventura/ Applicant
MM-BIO-10- Impacts to Nesting Birds	If any nests of passerine birds are observed, these nests should be designated an ecologically sensitive area and protected (while occupied) by a minimum 300-foot radius during project construction. If active nests are found, all construction must be postponed or halted until the biologist determined the nest is vacated, juveniles have fledged, and no evidence of a second nesting attempt is observed. The biologist should serve as a construction monitor during periods of construction occur near the active nest areas to ensure that no inadvertent impacts occur.	Prior to/ During Project construction and activities	County of Ventura/ Applicant
MM-BIO-11- Impacts to Nesting Birds	To protect nesting raptors that may occur on-site, CDFW recommends that the final environmental document include a measure that no construction should occur from January 1 through September 15. If construction is unavoidable during January 1 through September 15, a qualified biologist should complete surveys for nesting bird activity the orders <i>Falconiformes</i> and	Prior to/ During Project construction and activities	County of Ventura/ Applicant

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	<p><i>Strigiformes</i> (raptors and owls) within a 500-foot radius of the construction site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. If any nests of birds of prey are observed, these nests should be designated an ecologically sensitive area and protected (while occupied) by a minimum 500-foot radius during project construction. Pursuant to FGC Sections 3503 and 3503.5, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird or bird-of-prey.</p>		
<p>MM-BIO-12- Impacts to Nesting Birds</p>	<p>CDFW cannot authorize the take of any fully protected species as defined by state law. State fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for its take except for collecting those species for necessary scientific research and relocation of the bird species for protection of livestock (Fish & G. Code, §§ 3511, 4700, 5050, 5515). CDFW has advised the Permittee that take of any species designated as fully protected under the Fish and Game Code is prohibited. CDFW recognizes that certain fully-protected species are documented to occur on, or in, the vicinity of the Project area, or that such species have some potential to occur on, or in, the vicinity of Project, due to the presence of suitable habitat.</p>	<p>Prior to Project construction and activities</p>	<p>County of Ventura/ Applicant</p>
<p>MM-BIO-13- Impacts to Bats</p>	<p>CDFW recommends a qualified bat specialist conduct bat roosting surveys within the Project site and a 200-foot buffer to locate potential bat roosting sites. These assessments will determine baseline conditions of potential roosting areas present throughout the study area 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.</p>	<p>Prior to Project construction and activities</p>	<p>County of Ventura/ Applicant</p>
<p>MM-BIO-14- Impacts to Bats</p>	<p>To prevent project delays and possible “take,” CDFW also recommends nighttime emergence surveys of day roosts during seasons when bats are most mobile (April 1 to September 30). Emergence surveys should be performed shortly after dusk to identify any bats that emerge from a potential roost site. CDFW recommends using acoustic recognition technology to maximize</p>	<p>Prior to Project construction and activities</p>	<p>County of Ventura/ Applicant</p>

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	<p>detection of bats. 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).</p> <p>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).</p>		
<p>MM-BIO-15- Impacts to Bats</p>	<p>If maternity roosts are found, CDFW recommends, the following mitigation measures-</p> <ol style="list-style-type: none"> 1. If maternity roosts are found, to the extent feasible, work should 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). 2. If maternity roosts are found and if trees and/or structures must be removed/demolished during the maternity season, a qualified bat specialist should 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 should 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 should be left in place until the end of the 	<p>Prior to Project construction and activities</p>	<p>County of Ventura/ Applicant</p>

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	<p>maternity season. Work should not occur within 100 feet of or directly under or adjacent to an active roost and work should not occur between 30 minutes before sunset and 30 minutes after sunrise.</p> <p>3. If bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year, trees will be removed using the two-step removal method. Segments of the tree which do not offer any roosting habitat will be removed using a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees should be pushed lightly with heavy machinery two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be left in place for at least a 24-hour period and inspected by a bat specialist. Trees that are known to be bat roosts should not be bucked or mulched immediately. A period of at least 24 hours, and preferably 48 hours, should elapse prior to such operations to allow bats to escape. Bats should be allowed to escape prior to demolition of buildings. This may be accomplished by using lights, fans, and 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>MM-BIO-16- Impacts to Bats</p>	<p>If roosting habitat is available but absence is confirmed following appropriate focus-surveys CDFW recommends removing potential roosting habitat during winter months (November 1-January 31). Removal of habitat where bats have been determined to be absent will prevent future occupation in the area. Bats move roosting locations frequently based on need or seasonal changes. Habitat that is not occupied may become so in a matter of days, to weeks, to months, to years.</p>	<p>Prior to Project construction and activities</p>	<p>County of Ventura/ Applicant</p>

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MM-BIO-17- Impacts to Non- Game Mammals and Wildlife	If fencing is proposed for use during construction or during the life of the Project, fences should 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 should also be minimized so as not to restrict free wildlife movement through habitat areas. Los Angeles County's Significant Ecological Areas Ordinance Implementation Guide (https://planning.lacounty.gov/site/sea/wp-content/uploads/2020/02/SEA-IG-2-6-20.pdf) offers additional information on permeable fencing as well as design standards. CDFW recommends reviewing those design standards.	Prior to Project construction and activities	County of Ventura/ Applicant
MM-BIO-18- Impacts to Non- Game Mammals and Wildlife	To avoid direct mortality, a qualified biological monitor should 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 should 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.	Prior to Project construction and activities	County of Ventura/ Applicant
MM-BIO-19- Impacts to Non- Game Mammals and Wildlife	Grubbing and grading should be done to avoid islands of habitat where wildlife may take refuge and later be killed by heavy equipment. Grubbing and grading should be done from the center of the Project site, working outward towards adjacent habitat off site where wildlife may safely escape.	Prior to Project construction and activities	County of Ventura/ Applicant
REC-1- Mountain Lion	CDFW recommends the County evaluate the mountain lion territory size and use of habitat within and surrounding the Project vicinity. The County should analyze the change (i.e., increase) in human presence and area of anthropogenic influence that will now be in mountain lion habitat and how it may impact mountain lion behavior, reproductive viability, and overall survival success. Based on these known anthropogenic impacts on mountain lions,	Prior to Project construction and activities	County of Ventura/ Applicant

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	CDFW also recommends the County provide compensatory mitigation for impacts to mountain lion. The CEQA document should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant.		
REC-2- Fuel Modification	If the Project includes fuel modification, CDFW recommends that the final environmental include avoidance and mitigation measures for any fuel modification activities conducted within and adjacent to the Project area. A weed management plan should be developed for all areas adjacent to open space that will be subject to fuel modification disturbance. CDFW also recommends that any irrigation proposed in fuel modification zones drain back into the development and not onto natural habitat land as perennial sources of water allow for the introduction of invasive Argentine ants.	Prior to Project construction and activities	County of Ventura/ Applicant
REC-3- Mitigation and Monitoring Reporting Plan	Per Public Resources Code section 21081.6(a)(1), CDFW has provided the County with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan. A final MMRP should reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.	Prior to Project construction and activities	County of Ventura/ Applicant