



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

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



Governor's Office of Planning &amp; Research

June 3, 2022

Jun 06 2022

Mrs. Kristina Boero  
Ventura County  
800 S. Victoria Ave. #1740  
Ventura, CA 93009  
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**STATE CLEARINGHOUSE**

**Subject: Major Modification to Conditional Use Permit No. 3697, Mitigated Negative Declaration, SCH No. 2022050013; City of Ojai, Ventura County**

Dear Mrs. 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, utilities, and landscaping at the Krishnamurti Retreat Camp (Camp). The Project includes the following activities:

### Cottages and Structures

The proposed project plans to erect several structures including a reception building, maintenance shed, ADA Accessible public restroom, shade structure, solar array roof structure, storage building, three underwater rain capture tanks, and two cottages. Total area for the proposed structures will make up 10,931 square feet.

### Landscape Improvements

Within the MND it states that native plants will be used to make up the landscaping in this Project. Landscaping will be consistent with Ojai Valley Area Plan policy.

### Exterior Lighting

The Project plans to ensure that any new exterior lighting does not adversely impact the surrounding areas and is consistent with the exterior lighting requirements of the Ojai Valley Dark Sky Ordinance. Based on this ordinance the Project will ensure that all new lighting is shielded downward and does not exceed 850 lumens. A lighting plan will be submitted for approval.

### Grading and Construction

Grading and other construction activities involving heavy equipment shall be timed to avoid nesting bird season between (February 1-September 1). A qualified biologist will perform a pre-construction survey for Species of Special Concern (SSC) no more than 30 days prior to ground and continue weekly. If the County-approved biologist determines that silt fencing is necessary, the Applicant shall install silt fencing at the edge of the grading footprint. The County-approved biologist shall oversee the installation of the silt fencing. 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.

### Conditional Use Permit (CUP) Extension

The Project also includes an extension of the Conditional Use Permit (CUP) boundary, expanding the property from 3.17 acres to 11.12 acres. These parcels are designated as rural and border open space.

**Location:** The project site is located along McAndrew Road in an unincorporated area of the City of Ojai in Ventura County. The Project area is surrounded by rural, agricultural, open space, and mixed residential areas.

## **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: Survey Protocols for Special-Status Wildlife**

**Issue:** Surveys are needed to confirm/deny presence of special-status birds and reptiles.

**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 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 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 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. Surveys should be conducted by a qualified biologist to determine presence of active bird nests of special status bird species. Surveys should 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 birds of prey 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

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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 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.

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

**Mitigation Measure #1:** To disclose impacts to special-status reptiles within the MND, CDFW recommends focused surveys for species likely to occur within a Project(s) area. Additional surveys will more reliably determine what species are present so CDFW can make informed recommendations as to avoidance, minimization, and mitigation measures. Surveys should typically be scheduled during the summer months (June and July) when these animals are most likely to be encountered. To achieve 100 percent visual coverage, CDFW recommends surveys be conducted with parallel transects at approximately 20 feet apart and walked on-site in appropriate habitat suitable for each species. Suitable habitat consists of areas of sandy, loose, and moist soils, typically under the sparse vegetation of scrub, chaparral, and within the duff of oak woodlands.

**Mitigation Measure #2:** Prior to any Project activities, a relocation plan (Plan) should be developed by a qualified biologist familiar with the respective reptile in consultation with CDFW. The Plan should include, but not be limited to, the timing and location of the surveys that will be conducted for the species, identify the locations where more intensive survey efforts will be conducted (based on high habitat suitability); identify the habitat and conditions in any proposed relocation site(s); the methods that will be utilized for trapping and relocating the individuals; and the County coordinate with CDFW and/or the U.S. Fish and Wildlife Service (USFWS) prior to any ground disturbing activities within potentially occupied habitat.

**Comment #2: Spreading Invasive Pests and Diseases**

**Issue:** CDFW is concerned that the MND does not describe procedures for disposal of removed trees which may be infested with invasive pests and disease.

**Specific impacts:** The Project proposes to remove an unspecified amount of vegetation. Improper disposal of vegetation may result in the spread of tree insect pests and disease into

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areas not currently exposed to these stressors. This could result in expediting the loss of oaks and other trees in California which support a high biological diversity including special status species. The environmental document should address the presence or absence of goldspotted oak borer (*Agrilus auroguttatus*), Polyphagous shot-hole borer (*Euwallacea* sp.), and thousand canker fungus (*Geosmithia morbida*) in on-site trees and, if present, describe how any effected trees would be disposed of as part of the Project.

**Why impacts would occur:** Within the Arborist Report are the results of the tree surveys conducted in Within report the arborist graded the trees from A-F for both health and vigor. In addition, the arborist also noted if signs of insects/mites presence were observed. Of the five coast live oaks that are planned to be removed, one showed signs of insect presence (#21). Thus, the Project may remove tree species that could host insect pests and diseases. Trees will be removed and presumably hauled to off-site locations for disposal thereby potentially exposing off-site oak and other tree species to infestation and disease.

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

**Mitigation Measure #1:** CDFW recommends the County/Applicant work with the certified arborist to identify all trees and species for removal from the Project site and inspect those trees for contagious tree diseases including but not limited to: thousand canker fungus (<https://thousandcankers.com/>), Polyphagous shot hole borer (<https://ucanr.edu/sites/eskalenlab/?file=index.html>), and goldspotted oak borer (<http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html>). A summary report documenting inspection methods, number and species of trees inspected, results, and conclusions, including negative findings, should be submitted to CDFW for review and included as an appendix in final environmental documents. The summary report should also include photographic documentation of entry/exit holes and evidence of pests/disease.

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

### **Comment #3: 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.

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**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.

**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

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disturbance. CDFW also recommends that any irrigation proposed in fuel modification zones 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](mailto:Angela.Castanon@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
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Erinn Wilson-Olgin  
Environmental Program Manager I  
South Coast Region

ec: CDFW

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**References:**

- [CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available from: <https://nrm.dfg.ca.gov>
- [TCD] Thousand Cankers Disease. 2021. What is Thousand Cankers? Available from: <https://thousandcankers.com/>
- [UCCE] UC California Cooperative Extension. 2022. Eskalen's Lab. Available from: <https://ucanr.edu/sites/eskalenlab/?file=index.html>
- [UCIPM] UC Integrated Pest Management Program. 2021. Goldcotted Oak Borer. Available from: <http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html>



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### 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.

<b>Biological Resources (BIO)</b>			
<b>Mitigation Measure (MM) or Recommendation (REC)</b>		<b>Timing</b>	<b>Responsible Party</b>
<b>MM-BIO-1- Impacts to Nesting Birds</b>	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 should 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
<b>MM-BIO-2- Impacts to Nesting Birds</b>	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

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<p><b>MM-BIO-3- Impacts to Nesting Birds</b></p>	<p>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 <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>Prior to/ During Project construction and activities</p>	<p>County of Ventura/ Applicant</p>
<p><b>MM-BIO-4- Impacts to Nesting Birds</b></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 &amp; 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><b>MM-BIO-5- Impacts to Reptiles</b></p>	<p>To disclose impacts to special-status reptiles within the MND, CDFW recommends focused surveys for species likely to occur within a Project(s) area. Additional surveys will more reliably determine what species are present so CDFW can make informed recommendations as to avoidance, minimization, and mitigation measures. Surveys should typically be scheduled during the summer months (June and July) when these animals are most</p>	<p>Prior to Project construction and activities</p>	<p>County of Ventura/ Applicant</p>

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	likely to be encountered. To achieve 100 percent visual coverage, CDFW recommends surveys be conducted with parallel transects at approximately 20 feet apart and walked on-site in appropriate habitat suitable for each species. Suitable habitat consists of areas of sandy, loose, and moist soils, typically under the sparse vegetation of scrub, chaparral, and within the duff of oak woodlands.		
<b>MM-BIO-6- Impacts to Reptiles</b>	Prior to any Project activities, a relocation plan (Plan) should be developed by a qualified biologist familiar with the respective reptile in consultation with CDFW. The Plan should include, but not be limited to, the timing and location of the surveys that will be conducted for the species, identify the locations where more intensive survey efforts will be conducted (based on high habitat suitability); identify the habitat and conditions in any proposed relocation site(s); the methods that will be utilized for trapping and relocating the individuals; and the County coordinate with CDFW and/or the U.S. Fish and Wildlife Service (USFWS) prior to any ground disturbing activities within potentially occupied habitat.	Prior to Project construction and activities	County of Ventura/ Applicant
<b>MM-BIO-7- Pests and Diseases</b>	CDFW recommends the County/Applicant work with the certified arborist to identify all trees and species for removal from the Project site and inspect those trees for contagious tree diseases including but not limited to: thousand canker fungus ( <a href="https://thousandcankers.com/">https://thousandcankers.com/</a> ), Polyphagous shot hole borer ( <a href="https://ucanr.edu/sites/eskalenlab/?file=index.html">https://ucanr.edu/sites/eskalenlab/?file=index.html</a> ), and goldspotted oak borer ( <a href="http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html">http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html</a> ). A summary report documenting inspection methods, number and species of trees inspected, results, and conclusions, including negative findings, should be submitted to CDFW for review and included as an appendix in final environmental documents. The summary report should also include photographic documentation of entry/exit holes and evidence of pests/disease.	Prior to Project construction and activities	County of Ventura/ Applicant

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<b>MM-BIO-8- Pests and Diseases</b>	If invasive pests and/or diseases are detected, the County/Applicant should provide an infectious tree disease management plan and describe how it will be implemented to avoid significant impacts under CEQA. To avoid the spread of infectious tree diseases, diseased trees should not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed. A management plan should be submitted to CDFW for review and included as an appendix in the final environmental document.	Prior to Project construction and activities	County of Ventura/ Applicant
<b>MM-BIO-9- Impacts to Non- Game Mammals and Wildlife</b>	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 ( <a href="https://planning.lacounty.gov/site/sea/wp-content/uploads/2020/02/SEA-IG-2-6-20.pdf">https://planning.lacounty.gov/site/sea/wp-content/uploads/2020/02/SEA-IG-2-6-20.pdf</a> ) 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
<b>MM-BIO-10- Impacts to Non- Game Mammals and Wildlife</b>	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

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<b>MM-BIO-11- Impacts to Non- Game Mammals and Wildlife</b>	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
<b>REC-1- Fuel Modification</b>	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.	During construction and activities	County of Ventura/ Applicant
<b>REC-2- Mitigation and Monitoring Reporting Plan</b>	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