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February 3, 2023

FEB 3 2023

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STATE CLEARING HOUSE

Subject: Moorpark General Plan Update, Programmatic Environmental Impact Report, SCH No. 2022050327; City of Moorpark, Ventura County

Dear Mr. Spondello:

The California Department of Fish and Wildlife (CDFW) has reviewed the City of Moorpark's (City) Programmatic Environmental Impact Report (PEIR) the Moorpark General Plan Update (Project). CDFW commented on the related Notice of Preparation (NOP) on June 16, 2022. Subsequently, the City, as Lead Agency, has prepared a PEIR 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 update to the Moorpark General Plan is a planning tool used by City staff in determining the physical layout and future development of the City into the year 2050. The Plan addresses individual elements of concern. Within the document it had been determined that unavoidable significant impacts will occur to biological resources as a result of habitat loss.

Location: The Project is effective City-wide in Moorpark, a city within Ventura County.

Comments and Recommendations

CDFW appreciates the City's efforts in offering avoidance, minimization, and mitigation measures for biological resources. CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating significant, or potentially significant, direct and indirect impacts on fish and wildlife biological resources of future Projects tiered from the PEIR.

Specific Comments

Comment #1: Impacts to Wildlife Corridors and Linkages

Issue: Future Projects tiered off the PEIR have potential to impact and further degrade the Santa Monica-Sierra Madre wildlife corridor.

Specific Impact: The western segment of the Santa Monica-Sierra Madre wildlife corridor will be significantly impacted due to future projects to be tiered off the PEIR. Projects include but are not limited to the extension of the State Route (SR)-23 and construction of a bypass route for the SR-118.

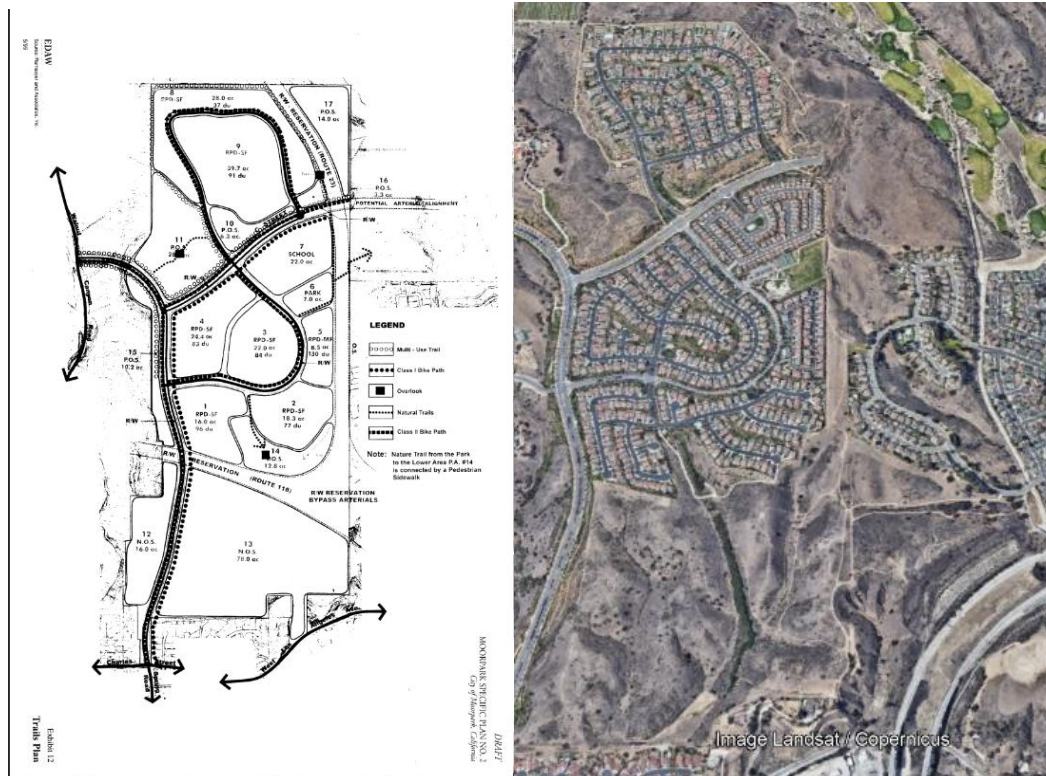
Why Impact Would Occur: The PEIR states, "The western branch [of the Santa Monica-Sierra Madre corridor] is fragmented by existing industrial and residential developments and includes the Moorpark Highlands Specific Plan area. The area connecting the western branch through the Specific Plan area could be further fragmented by the extension of SR-23 and North Hills Parkway, a potential bypass route for SR-118." The Project as proposed within the Moorpark Highlands Specific Plan II, and to be tiered from the PEIR would construct an extension of the SR-23 through the only remaining traversable segment of the western branch, potentially making it impassable (*Figures 1,2, & 3*). Proposed mitigation within BIO-8 of the document provided appropriate measures to be incorporated into future Projects, however CDFW is still concerned that the SR-23 and SR-118 Projects will completely block the western branch of the Santa Monica-Sierra Madre wildlife corridor and create a chokepoint for wildlife. Increased noise, light, and vibration will also have negative impacts to wildlife movement in the surrounding area.

A number of species likely utilize both segments of the Santa Monica-Sierra Madre corridor, including CESA-candidate mountain lion (*Puma concolor*). Wildlife often use riparian corridors and ridgelines to move throughout their range (Jennings 2013 & Dickson 2005). Happy Camp Canyon provides a large riparian corridor that is accessible to the Big Mountain range and the Oak Ridge range, which connects to the Santa Susana Mountains (*Figure 3*). Extending the SR-23 into the area directly west of Happy Camp Canyon could potentially funnel wildlife into a

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chokepoint and increase road strikes (*Figure 2*). The western branch of the corridor leads to the current SR-118 overpass to the southeast, where wildlife can utilize the riparian areas associated with Arroyo Simi to travel into the Tierra Rejada critical wildlife passage.

Within the comment letter for the associated NOP from CDFW to the City of Moorpark the following was requested; "CDFW recommends the City analyze whether the Project would impact wildlife corridors... Impacts include (but are not limited to) habitat loss and fragmentation, narrowing of a wildlife corridor, and introduction of barriers to wildlife movement. CDFW recommends such an analysis be supported by studies to document wildlife activity and movement through Project area where development is proposed. Technical detail such as data, maps, diagrams, and similar relevant information should be provided to permit full assessment if significant environmental impacts by reviewing agencies and members of the public (CEQA Guidelines, §15147)." The PEIR did not analyze in detail potential impacts to wildlife corridors nor provide any technical data, maps, or diagrams. The PEIR only disclosed that impacts were likely to occur without any specific information into where impacts would occur, how it would impact wildlife movement, and acreage of the Santa Monica-Sierra Madre corridor lost. CEQA Guidelines §15070 and §15071 require the PEIR to analyze if the Project may have a significant effect on the environment as well as review if the Project will 'avoid the effect or mitigate to a point where clearly no significant effects would occur'. Relying on future surveys and the preparation of future management plans are considered deferred mitigation under CEQA. This information is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to focal species to wildlife movement (e.g., current range, distribution, population trends, and connectivity). Absent of studies and technical plans it is difficult for CDFW to assess impacts or the appropriateness of proposed mitigation for tiered off Projects.



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Figure 1. Moorpark’s plans for the SR-118 and SR-23 expansion taken from the Moorpark Highland’s Specific Plan (left) in relation to satellite imagery of the area (right).

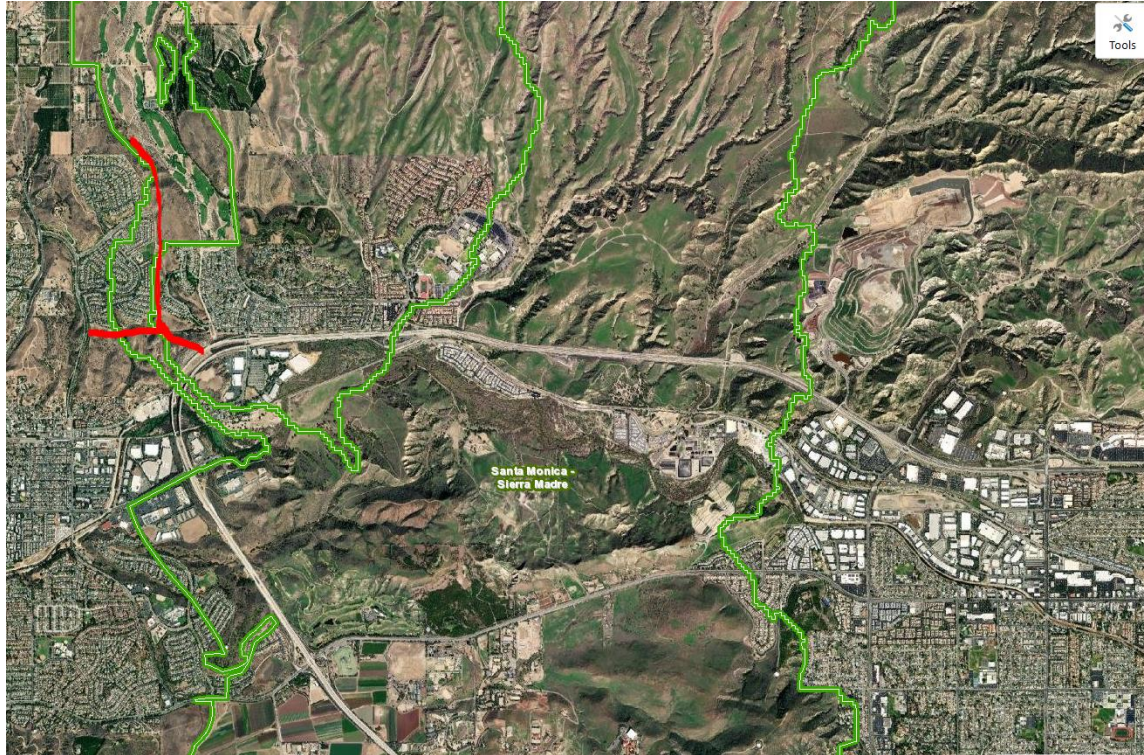
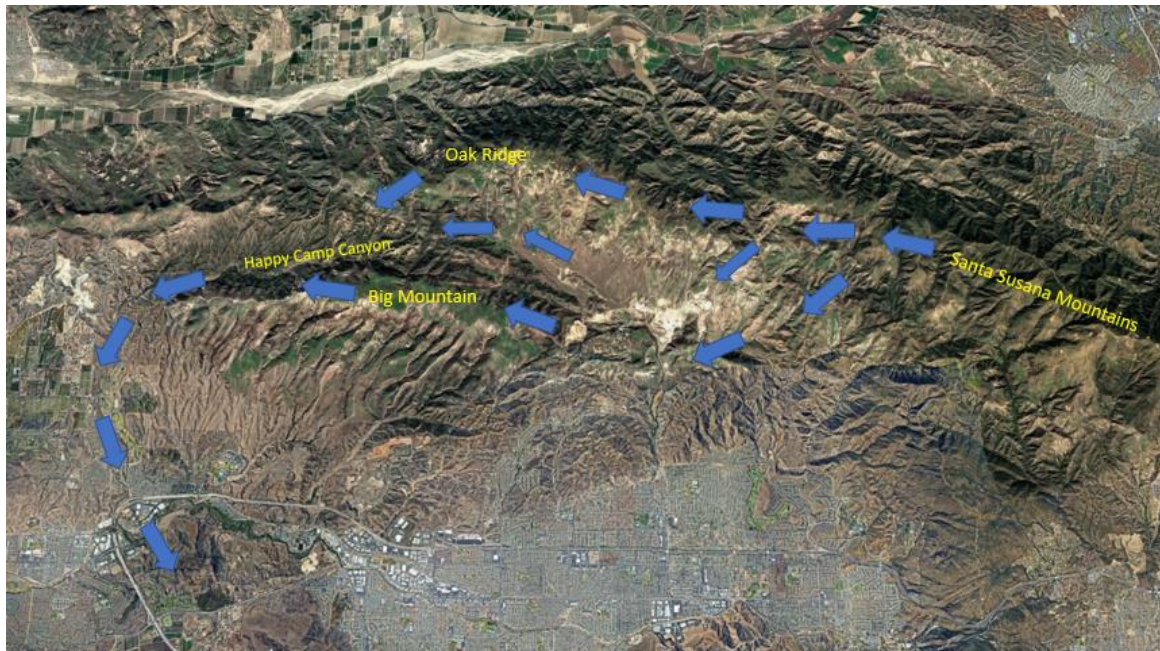


Figure 2. Imagery of the Santa Monica-Sierra Madre corridor (green) traversing Moorpark. The western branch is already severely impacted, proposed extension of the SR-23 and SR-118 (alignment approximated in red) would completely block the corridor.



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Figure 3. Potential paths of movement could funnel wildlife into Happy Camp Canyon, creating a potential chokepoint where the SR-23 is extended. *Note there are many paths of travel, this figure only aims to depict potential travel towards the proposed SR-23 and SR-118 Project sites.

Evidence Impact Would Be Significant: Future Projects lie within the Santa Monica-Sierra Madre wildlife corridor overlay zone. The Santa Monica-Sierra Madre wildlife corridor is especially important in terms of preservation as it is one of few coastal to inland connections remaining in the South Coast Ecoregion (South Coast Wildlands 2008). This overlay zone is associated with the Ventura County ordinance to regulate development within habitat connectivity and wildlife corridors (Ventura 2019). On May 12, 2019, Ventura County established Ordinance number 4537, the non-coastal zoning ordinance to regulate development within the habitat connectivity and wildlife corridors, and the critical wildlife passage area overlay zones. This ordinance was established to “preserve functional connectivity for wildlife and vegetation throughout the overlay zone by minimizing direct and indirect barriers, minimizing loss of vegetation and habitat fragmentation and minimizing impacts to those areas that are narrow, impacted or otherwise tenuous with respect to wildlife movement.” According to the ordinance the purpose of the ordinance is as follows:

- a) Minimize the indirect impacts to wildlife created by outdoor lighting, such as disorientation of nocturnal species and the disruption of mating, feeding, migrating, and the predator-prey balance.
- b) Preserve the functional connectivity and habitat quality of surface water features, due to the vital role they play in providing refuge and resources for wildlife.
- c) Protect and enhance wildlife crossing structures to help facilitate safe wildlife passage.
- d) Minimize the introduction of invasive plants, which can increase fire risk, reduce water availability, accelerate erosion and flooding, and diminish biodiversity within an ecosystem.
- e) Minimize wildlife impermeable fencing, which can create barriers to food and water, shelter, and breeding access to unrelated members of the same species to maintain genetic diversity.

Further, the Santa Monica-Sierra Madre connection which stretches from the Santa Monica Mountains at the coast inland to the Santa Susana Mountains and the Sierra Madre Ranges of Los Padres National Forest includes substantial public ownership. Currently 34% (43,249 of 125,613 acres) of the connection is receiving some level of conservation protection that protects natural habitats from development (South Coast Wildlands 2008). Implementation Project elements will undermine the goals of these conservational efforts by potentially blocking the western branch of the corridor and creating a chokepoint to wildlife movement.

Recommended potentially feasible mitigation measure(s):

Mitigation Measure #1: Avoidance: CDFW recommends that Projects tiered off the PEIR avoid to the extent possible further encroaching into the Santa Monica-Sierra Madre wildlife corridor. Future placement of transportation corridors and development patterns should not exacerbate barriers to wildlife movement. CDFW recommends redesigning future Projects to avoid impacts to the wildlife corridor, including future modifications to the SR-118 and SR-23.

Mitigation Measure #2: Future Analysis: Referencing the information provided within the PEIR, it is unclear if the City is making enough space for wildlife movement under the proposed

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General Plan. All future Projects tiered off the PEIR should conduct specific studies to understand how Project implementation will affect wildlife movement. CDFW recommends all future Projects analyze whether they would impact wildlife corridors and essential connectivity blocks within the entirety of the Project area. Impacts include but are not limited to:

- a) Direct impacts to, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, due to habitat loss (acreage lost) and fragmentation, narrowing of a wildlife corridor (acreage lost), introduction of barriers to wildlife movement;
- b) Indirect impacts from increased noise, light, and human activity; and
- c) An assessment on areas which would most benefit wildlife crossing and structures with consideration to past, present, and future Projects.

CDFW recommends such an analysis be supported by studies to document wildlife activity and movement through Project area where development is proposed.

Mitigation Measure #2: Land Acquisition for Mitigation: Policy COS-1.290 within the document mentions the exploration of acquisition of open space “including privately owned parcels located adjacent to or within recognized critical habitats and wildlife corridors.” This Policy should be rewritten into a mitigation measure to better ensure the preservation of important areas associated with wildlife movement. CDFW recommends the Applicant retain contiguous land parcels surrounding the Santa Monica-Sierra Madre corridor. If land within the boundaries of Moorpark is already protected, then acquisition should expand past the City boundaries to aid in the preservation of the corridor to the north and south. Land retained should be protected in perpetuity from encroachment and development to ensure the preservation of the Santa Monica-Sierra Madre wildlife corridor. The mitigation lands should be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094 (2012). Assembly Bill 1094 amended Government Code, sections 65965-65968. Under Government Code, section 65967(c), the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves. An appropriate non-wasting endowment should be provided for the long-term management of mitigation lands. A conservation easement and endowment funds should be fully acquired, established, transferred, or otherwise executed prior to implementing Project-related ground disturbing activities and prior to the County’s issuance of grading permits.

Mitigation Measure #3: Wildlife Crossings and Passages as Mitigation: If impacts to movement corridors occur, future Projects should also include plans to implement or help fund wildlife crossing structures or passages. Crossing designs should also be included as elements within Projects related to the expansion of the SR-23 and SR-118. Future Projects should provide minimum criterion for design features, dimensions, and locations of potential crossings and associated fencing.

Recommendation #1: Santa Monica-Sierra Madre: Projects tiered off the PEIR should avoid further blocking of either branch of the corridor. CDFW recommends that the areas proposed for the extension of the SR-23 and the SR-118 bypass be preserved in perpetuity as open space and not be further developed or encroached upon (*Figure 4*). Protection of these areas would ensure the continued wildlife movement to and from Happy Camp Canyon to the riparian areas

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associated with Arroyo Simi under the 118 overpass and allow passage to the Tierra Rejada critical passage. Proper thresholds for sound, light, and buffers should be maintained.



Figure 4. Areas outlined in red should be protected in perpetuity from development and encroachment. Last traversable area of the western branch of the Santa Monica-Sierra Madre wildlife corridor. This area offers connectivity to Happy Camp Canyon to the Tierra Rejada critical passage.

Recommendation #2: SR-23 and SR-118: These Projects are related to the 1999 Moorpark Highlands Specific Plan and have a level of planning behind them. The current PEIR, future PEIRs, and Projects tiered off the PEIR should analyze the cumulative impacts of extending the SR-23 and 118 within these important movement areas as part of their analysis. The Applicant should consider current, planned, and future wildlife passage projects when analyzing Project impacts. Technical detail such as data, maps, diagrams, and similar relevant information should be provided to permit full assessment if significant environmental impacts by reviewing agencies and members of the public (CEQA Guidelines, §15147).

Recommendation #3: Data Set Review: Data sets to be considered within the analyses of Projects tiered from the PEIR should include, but not be limited to: Missing Linkages in California's landscape California Natural Diversity Database (CNDDDB) layer (ds420), South Coast Missing Linkages (ds419), and Essential Connectivity Areas (ds620). Based on these datasets, the Projects should identify areas of possible impact. The Projects should also

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consider the South Coast Missing Linkages projected “least cost” linkage designs for the South Coast Ecoregion (South Coast Wildlands 2008 & Penrod 2006). Subsequent Projects should also review CDFW’s Priority Wildlife Movement Barrier locations report (CDFW 2020a) and National Park Service’s (NPS) collar data relating to mountain lion.

Comment #2: Impacts to Streams and Associated Natural Communities

Issue: Projects mentioned within and tiered off the PEIR could cause potential impacts to streams and wetlands throughout the City of Moorpark.

Specific Impact: Project activities tiered off the PEIR may impact streams and wetlands due to the implementation of Projects throughout the City. Grading, excavation, vegetation removal, dewatering, introduction of sediment and pollutants could impact the bed, banks, and lower water quality in water bodies in the Project area.

Why Impact Would Occur: The PEIR states, “There are several aquatic features that are potentially under the jurisdiction of the USACE and the CDFW in Moorpark... This includes areas where waters flow, as well as surrounding vegetation that is riparian in nature or tied hydrologically to the associated aquatic feature... Future site-specific projects built in accordance with the Moorpark General Plan 2050 could potentially impact these sensitive riparian habitats...” Important riparian natural communities are present throughout Moorpark. The vegetation maps provided within the PEIR generalized natural communities. Alliance communities with potential to occur within the umbrella term “riparian” are listed in Table 1.

Table 1. Riparian alliance communities with potential to occur in Moorpark, taken from table 5.4-1 of the PEIR.

Riparian			237.1
<i>Arundo donax</i>	Giant reed marsh	-	
<i>Baccharis salicifolia</i>	Mulefat thickets	S4	
<i>Baccharis salicifolia</i> alliance	Mulefat thickets	S4	
<i>Platanus racemosa</i>	California sycamore woodlands	S3	
<i>Platanus racemosa</i> alliance	California sycamore woodlands	S3	
-	Riverine, lacustrine, and tidal mudflat mapping unit	-	
<i>Salix laevigata</i> – <i>Salix lasiolepis</i>	Willow riparian woodlands	-	
<i>Salix lasiolepis</i>	Arroyo willow thickets	S4	
-	Unknown riparian	-	

Activities such as excavation, backfilling, vegetation removal or modification, grading, construction, use of heavy equipment, and dewatering could lead to direct and/or indirect impacts to the bed, bank, or channel of streams. Projects tiered off the PEIR may introduce debris, soil, silt, sawdust, rubbish, raw cement/concrete, or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous or deleterious to aquatic life and the surrounding riparian habitat. Entry of these materials into the water system could result in degradation of on-site and downstream water quality in freshwater systems. Excavation and stockpiling of soils may result in the influx of sediment into the system which could result in changes to the streams and alter hydrologic and

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geomorphic processes that may impact plant and wildlife species. Project activities tiered from the PEIR may also impact tributaries that occur upstream, outside of the Project boundary, where hydrologic connectivity occurs.

Evidence Impact Would Be Significant: The Project may impact streams and associated riparian habitats. CDFW exercises its regulatory authority (Fish and Game Code, section 1600 *et seq.*) to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated natural communities. Fish and Game Code, section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or,
- Deposit or dispose of material into any river, stream, or lake.

CDFW requires a Lake and Streambed Alteration Agreement (LSA) Agreement when a project activity may substantially adversely affect fish and wildlife resources.

For reasons discussed above, the Project may continue to have a substantial adverse effect on streams and associated riparian habitat through excavation, grading, hydrological interruption, or other means.

Recommended potentially feasible mitigation measure(s):

Mitigation Measure #1: Avoidance: All Projects tiered from the PEIR should avoid impacts to streams, wetlands and associated natural communities.

Mitigation Measure #2: Notification: Projects tiered from the PEIR that have the potential to impact streams or associated communities should provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW shall determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting the proposed activities. A notification package for a LSA may be obtained by accessing CDFW's web site at <https://www.wildlife.ca.gov/conservation/lisa> (CDFW 2023b). The notification to CDFW should provide the following information:

1. A stream delineation in accordance with the U.S. Fish and Wildlife Service wetland definition adopted by CDFW;
2. Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Projects. This includes impacts as a result of routine maintenance and fuel modification. Plant community names should be provided based on vegetation association and/or alliance per the [Manual of California Vegetation](#) (CNPS 2023);
3. A discussion as to whether impacts on streams within subsequent Project sites would impact those streams immediately outside of the Project sites where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and,

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4. A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project sites. Additionally, the hydrological evaluation should assess a sufficient range of storm events (e.g., 100, 50, 25, 10, 5, and 2-year frequency storm events) to evaluate water and sediment transport under pre-Project and post-Project conditions.

If necessary, CDFW's issuance of an LSA Agreement for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document of the Lead Agency for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to streams or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

Mitigation Measure #3: Conditions: Any LSA Agreement issued for tiered off Projects by CDFW may include additional measures protective of streambeds on and downstream of the Project such as additional erosion and pollution control measures. To compensate for any on-site and off-site impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: avoidance of resources, on-site or off-site creation, enhancement, or restoration, and/or protection and management of mitigation lands in perpetuity.

Comment #3: Natural Communities Mapping

Issue: The PEIR did not map natural communities to the alliance level.

Specific Impact: Natural communities were not mapped to the level of detail necessary to assess impacts. Within the Notice of Preparation (NOP) comment letter provided to the City from CDFW an alliance- and/or association-based mapping was requested for the subsequent PEIR.

Why Impact Would Occur: Projects tiered off the PEIR could impact sensitive natural communities within the Project area. The natural communities' maps included in the PEIR Volume 1 (Figure 5.4-1), and Volume 2 (Figures 6a-6d) did not provide natural communities maps that were to the alliance and/or association level. Communities were "generalized" and characterized by terms such as chaparral, riparian, and mixed scrub and did not specify the distribution of specific plant communities throughout the Project area. The Manual of California Vegetation (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/>). Sensitive natural communities characterized at the alliance/association level differ in ranking and rarity. CDFW is unable to assess impacts or effectiveness of proposed mitigation without correct characterization of natural communities.

Evidence Impact Would Be Significant: Impacts to special-status plant species and communities 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

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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.

Adequate disclosure and analysis of potential impacts is necessary so CDFW may provide comments on the appropriateness of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to the natural community.

Recommended potentially feasible mitigation measure(s):

Mitigation Measure #1: Alliance/Association Based Mapping: The PEIR and all subsequent Projects tiered off the PEIR should provide a floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted. Future Project sites should map within the project footprint and fuel modification area. 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](#) (CDFW 2018c). [The MCV](#) should also be used to inform this mapping (CNPS 2023). The MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions. CDFW recommends the environmental document provide measures to fully mitigate the loss of individual Endangered Species Act (ESA)- and CESA-listed plants and habitat.

Mitigation Measure #2: Subsequent Projects: Projects tiered from the PEIR should provide a detailed map (1:24,000 or larger) 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). Any identified rare plants should also be plotted within the map.

Recommendation #1: Recirculation: The document should be updated with alliance-based mapping and recirculated for public review.

Comment #5: Insufficient Analysis of Cumulative Impacts Pertaining to Biological Resources

Issue: CDFW is concerned that the cumulative effects of future Projects were not sufficiently addressed within the PEIR. CDFW is concerned that future Projects will only be assessed on a project-by-project instead of cumulatively.

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Specific impacts: Projects tiered from the PEIR will develop large parcels of vacant, undeveloped, and open space. Development and removal of natural communities will significantly reduce the available foraging, nesting, and breeding habitat for wildlife species. The removal and development of these areas will also further constrain wildlife movement throughout the City. Future Project activities will also remove acres of natural communities and potentially, rare and CEQA protected plants.

Why impacts would occur: The PEIR states, “Future development in accordance with the proposed land use plan may replace existing vacant or undeveloped lands in the city with developed land uses or redevelop existing uses... [Present natural communities] are associated with valuable habitat for wildlife, and in some cases may contribute to wildlife movement. Therefore, implementation of the Moorpark General Plan 2050 could impact areas of previously undisturbed habitat.” CDFW is concerned that the PEIR is not preserving an appropriate amount of open space or usable habitat for wildlife. Cross referencing the current land use map (Figure 3-3; *Figure 5*) with the purposed land use map (Figure 3-5; *Figure 7*) and the vegetation communities map (Figure 5.4-1; *Figure 6*) it appears that large areas of open space and natural communities will be removed and or modified (*Figures 5-7*). The PEIR did offer appropriate mitigation measures for future Projects tiered off the document. However, CDFW is concerned that by deferring mitigation to a project-by-project basis impacts will not be assessed at a cumulative level.

The vacant, undisturbed, and open space parcels proposed for future development include acres of sensitive natural communities (*Figures 5 & 6*). Vacant lots and undeveloped lands include but are not limited to parcels under the North Ranch Plan, Hitch Ranch Specific Plan, Moorpark Highlands Specific Plan, and the Carlsberg Specific Plan (*Figures 5 & 7*). Because the vegetation mapping was not done to the alliance level it is unclear what specific communities are present and to be impacted. The majority of vegetation to be removed as a result of these Projects are categorized under the umbrella of “mixed scrub” (*Figure 6*). The PEIR provided a table of the different coastal sage scrub alliances that are grouped under this generalized plant community (Table 2). In southern California, human activities have eliminated coastal sage scrub from 70 to 90 percent of the original land area occupied by this habitat and contributed to significant fragmentation and degradation of existing habitat (EcoAdapt 2017). Additionally, land-use conversion is a significant barrier to sage scrub habitat continuity and dispersal in the face of climate change. In light of climate change and developmental pressures on the State’s shrublands, one of the goals of the [2030 Natural and Working Lands Climate Change Implementation Plan](#) is to conserve shrublands and protect land from conversion to more intensified uses (CalEPA et al. 2019). These communities are also important to ESA-listed coastal California gnatcatcher (*Polioptila californica californica*). Loss of coastal sage scrub natural vegetation communities may negatively impact resident and transient coastal California gnatcatchers in the surrounding area. Coastal California gnatcatchers are non-migratory, territorial, and have been found not to disperse far from their natal nests (USFWS 2022b; Bailey 1998; Vandergast 2019). Thus, the preservation of sensitive natural communities which support their survival is paramount, especially in urbanized and fragmented areas.

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Table 2. Alliance communities that are possible under the “mixed scrub” category.

Mixed Scrub			1894.9
<i>Artemisia californica</i>	California sagebrush scrub	S4	
<i>Artemisia californica</i> – <i>Eriogonum fasciculatum</i>	California sagebrush – California buckwheat scrub	S4	
<i>Artemisia californica</i> – <i>Salvia leucophylla</i>	California sagebrush – purple sage scrub	S4	
<i>Artemisia californica</i> – <i>Salvia mellifera</i>	California sagebrush – black sage scrub	S4	
<i>Baccharis pilularis</i>	Coyote brush scrub	S5	
<i>Baccharis pilularis</i> alliance	Coyote brush scrub	S5	
<i>Encelia californica</i>	California brittle bush scrub	-	
<i>Eriogonum fasciculatum</i>	California buckwheat scrub	S5	
<i>Lotus scoparius</i>	Deer weed scrub	S5	
<i>Malosma laurina</i>	Laurel sumac scrub	S4	
<i>Malosma laurina</i> alliance	Laurel sumac scrub	S4	
<i>Opuntia littoralis</i> alliance	Coast prickly pear scrub	S3	
<i>Opuntia</i> spp.	Coast prickly pear scrub	S3	
<i>Rhus integrifolia</i>	Lemonade berry scrub	S3	
-	Rock outcrop Mapping Unit	-	
<i>Salvia leucophylla</i>	Purple sage scrub	S4	
<i>Salvia leucophylla</i> alliance	Purple sage scrub	S4	
<i>Salvia mellifera</i> 1	Black sage scrub	S4	
<i>Salvia mellifera</i> – <i>Salvia leucophylla</i> alliance	Sage scrub	S4	

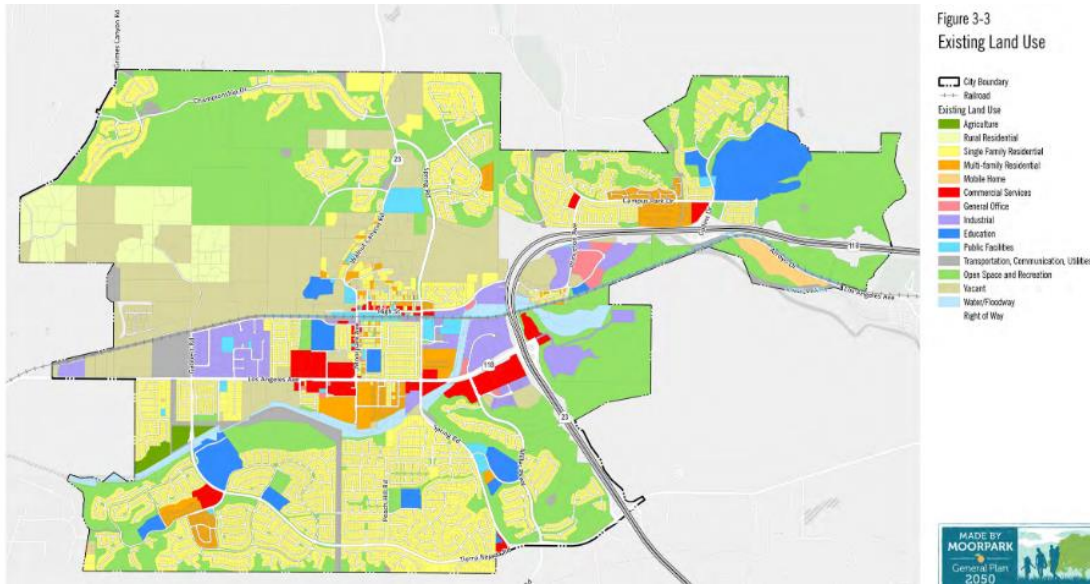


Figure 5. Provided existing land use map within the PEIR. Note the areas of open space (bright green) visible vs. in Figure 7, the proposed land use map. Vacant lots associated with future development are denoted by a tan color.

Oak woodlands are also present throughout lots identified for future development. Oak trees provide nesting and perching habitat for approximately 170 species of birds (Griffin and Muick 1990). Oak woodlands serve several important ecological functions such as protecting soils from erosion and land sliding; regulating water flow in watersheds; and maintaining water quality in streams and rivers. Oak woodlands also have higher levels of biodiversity than any other terrestrial ecosystem in California (Block et al. 1990). Coast live oak and old-growth oak trees (native oak tree that is greater than 15 inches in diameter) are of importance due to increased

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biological values and increased temporal loss. Due to the historic and on-going loss of this ecologically important vegetation community, oak trees and woodlands are protected by local and State ordinances. CDFW considers oak woodlands a sensitive vegetation community.

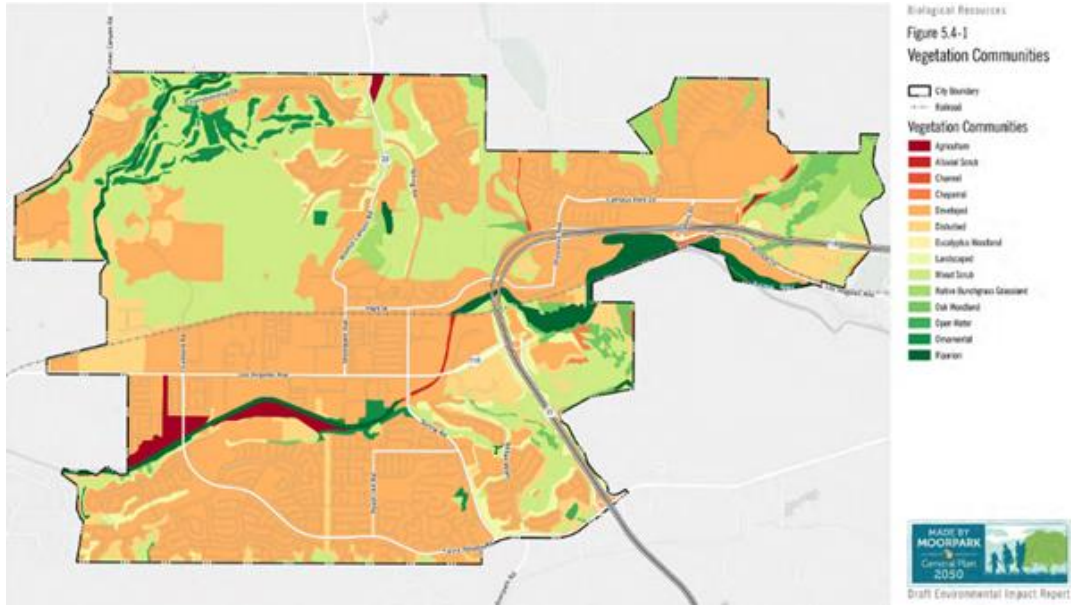


Figure 6. Provided vegetation map within the PEIR. The majority of Moorpark’s mixed scrub (lime green) align with “vacant and undeveloped” parcels (tan in Figure 5) and may be removed as part future Project activities. These areas are denoted by different colors (light sand/beige and stripes) within the Proposed land Use Map legend.

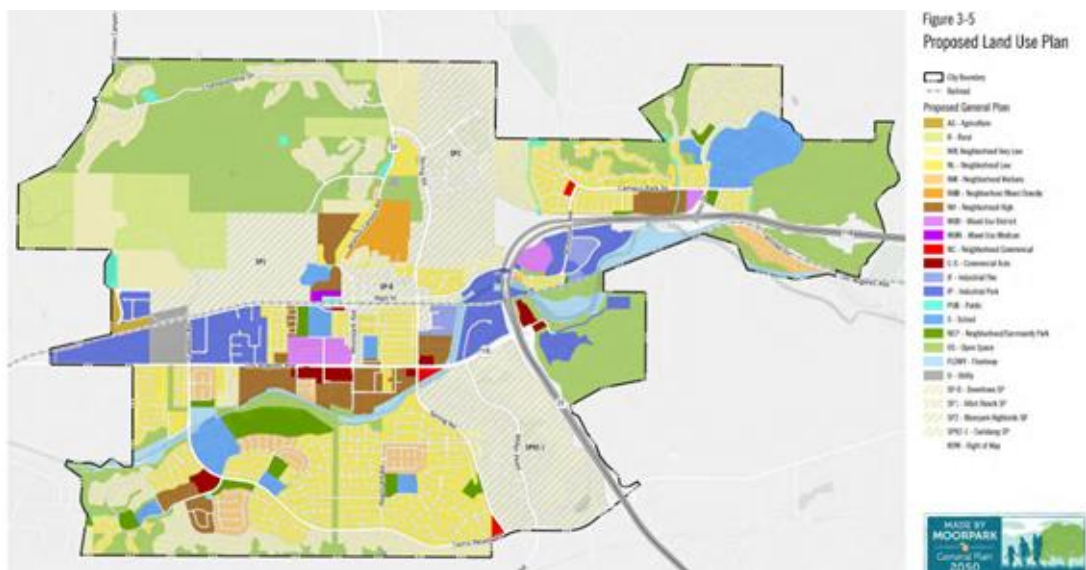


Figure 7. Provided proposed land use map within the PEIR. Vacant lots (tan in Figure 5) are now newly characterized within the legend to denote future development. Striped areas are associated with Specific Plans and light sand/beige with neighborhood (very low).

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Evidence Impact Would Be Significant: Impacts to sensitive natural communities should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Pursuant under CEQA Guidelines, section 15125(c), CDFW considers southern California coastal sage scrub habitats as locally significant. The absence of mitigation for many of the habitats listed above will result in significant loss of viable and valuable habitat. As a result, the Project may continue to have a significant change on the environment absent appropriate mitigation for the unavoidable direct and indirect, permanent or temporal losses, of native and undisturbed vegetation and habitat (CEQA Guidelines, § 15382). Collectively, Upland Scrub and Grassland habitats currently support or provide suitable habitat for plants and wildlife, including a rare plant and wildlife, including SSC. Inadequate or lack of avoidance, minimization, and mitigation measures for impacts to special status plant and wildlife species and sensitive vegetation communities will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW and USFWS.

CDFW considers oak woodlands to be a sensitive plant community. Oak trees and woodlands are protected by the Oak Woodlands Conservation Act (pursuant under Fish and Game Code sections 1360-1372) and Public Resources Code section 21083.4 due to the historic and ongoing loss of these resources. Moreover, [CDFW's Areas of Conservation Emphasis – Significant Habitats](#) dataset includes oak woodlands as a Terrestrial Significant Habitat based on its priority for conservation and acquisition planning for some counties, local jurisdictions, and the Wildlife Conservation Board (CDFW 2019d).

Recommended potentially feasible mitigation measure(s):

Mitigation Measure #1: Avoidance: All future Projects tiered off the PEIR should avoid sensitive natural communities, including locally important communities such as oak woodlands and alliances that fall under the coastal sage scrub characterization.

Mitigation Measure #2: Future Studies: Given the majority of the coastal sage scrub alliance communities will potentially be removed by the City of Moorpark by the year 2050, all future Projects tiered from the PEIR and future PEIRs should assess the cumulative impact of their Project.

- a) CDFW recommends future Projects and PEIRs analyze in depth and discuss the Project's direct impacts on sensitive habitats/open space within the Project area. The subsequent Projects/PEIRs should discuss loss of sensitive habitats/open space due to fuel modifications and introduction of nonnative, invasive plants facilitated by the Project (collectively, indirect impacts). All future Projects should disclose the acreage of sensitive habitats and open space that would be lost as a result of any subsequent development from the proposed Project, including all areas subject to fuel modifications and grading to accommodate development. CDFW also recommends Projects analyze and discuss the Project's potential impacts on conserved lands adjacent to the Project area.
- b) An analysis and discussion regarding the impact on special status species/communities as a result of direct/indirect impacts to sensitive habitats/open space. Species should

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include but not be limited to: coastal California gnatcatcher, mountain lion, Crotch's bumblebee (*Bombus crotchii*), Riverside fairy shrimp (*Streptocephalus woottoni*), and Lyon's pentachaeta (*Pentachaeta lyonia*). Analyses should include information on how removal or modification of sensitive habitats/opens space will impact movement, distribution, total acreage of available habitat (foraging, nesting, breeding), overall success of the species within the City, and implications of success throughout its range. A discussion on local extirpation should be included if applicable.

- c) An analysis of impacts from land use designations and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included; and
- d) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Recommendation #1: Locally Important Species and Habitats: CDFW recommends adding language regarding locally important species and habitats to BIO-2. Natural communities including but not limited to coastal sage scrub communities and oak woodland communities are considered locally important and should be appropriately mitigated for in subsequent Projects. Projects may also want to review [Ventura County's Locally Important Species List](#) (CVRMA 2022).

Recommendation #2: Preservation of Open Space: CDFW recommends the remaining open spaces be protected in perpetuity especially those that aid permeability for wildlife, are associated with riparian communities, and those that include habitat important to special status wildlife and plant species. This includes but is not limited to, the open space directly above the Hitch Ranch Specific Plan site as it has been documented to be high quality habitat for coastal California gnatcatcher (Impact Sciences 2022). As well as open spaces related to the Santa Monica-Sierra Madre wildlife corridor and the Tierra Rejada Critical Passage.

Additional Recommendations

Woodland Restoration. Prior to removing any oak or the understory vegetation, any Projects tiered off the PEIR should prepare a Woodland Restoration Plan. The Woodland Restoration Plan should prescribe the following:

1. Species-specific planting methods;
2. Planting schedule;
3. Measures to control exotic vegetation and protection from herbivory;
4. Measurable goals and success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover). Measurable success criteria should be based on site/habitat conditions prior to impact and/or functional local native oak shrublands/woodlands as reference sites;
5. Contingency measures if the success criteria is not met;
6. Long-term monitoring for at least 10 years, with a minimum of seven years without

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- supplemental irrigation;
7. Adaptive management techniques, including replacement plants if necessary; and
 8. Annual reporting criteria and requirements.

Fuel Modification. If Projects tiered off the PEIR include fuel modification, CDFW recommends that the final environmental documents 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 do not allow for the introduction of invasive Argentine ants. Monitoring should also include parameters to identify possible introduction of Argentine ants.

Weed Management Plans. Weed management plans should be developed for Projects tiered off the PEIR for all Project areas and implemented both during, and for at least 3 years post-Project. Non-native weeds including noxious weeds (as listed by the [California Invasive Plant Council](#)) (CALIPC 2022) should be prevented from becoming established to control the local spread of invasive plants, both during and after construction. Site visits should be conducted monthly and weekly during the rainy season. The Project areas should be monitored via mapping for new introductions and expansions of non-native weeds. Annual threshold limits, eradication targets, and monitoring should be included in this plan. Monitoring for spread of invasive weeds to adjacent lands should also be included.

In-lieu Fee Programs. In-lieu fees can be considered a type of deferred mitigation. Future Projects should utilize alternative methods of mitigation such as restoration, enhancement, and acquisition of lands to be protected in perpetuity.

Vegetation Table. Within table 5.4-1 of the PEIR *Arundo* (*Arundo donax*) is listed as a plant community. *Arundo* is listed on the California Invasive Plant Council's Invasive Plant List. It should not be included within the vegetation table, CDFW is only concerned with the removal of native plant communities.

Invasive Pests and Diseases. Any future Projects that remove vegetation that could host pest species should 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](#) (TCD 2021), [polyphagous shot hole borer](#) (UCANR 2018), and [goldspotted oak borer](#) (UCIPM 2021). If invasive pests and/or diseases are detected, the subsequent Projects 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(s) without first being treated using best available management practices relevant for each tree disease observed.

Mitigation and Monitoring Reporting Plan. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City 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.

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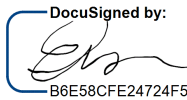
Filing Fees

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 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 District in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the District 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 or (626) 513-6308.

Sincerely,

DocuSigned by:

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Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW

Steve Gibson, Seal Beach – Steve.Gibson@wildlife.ca.gov

Cindy Hailey, San Diego – Cindy.Hailey@wildlife.ca.gov

CEQA Program Coordinator, Sacramento – CEQACommentLetters@wildlife.ca.gov

OPR

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

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State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 South Coast Region
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 San Diego, CA 92123
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GAVIN NEWSOM, Governor
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- Wildlife Corridors- Avoidance	CDFW recommends that Projects tiered off the PEIR fully avoid further encroaching into the Santa Monica-Sierra Madre wildlife corridor. Future placement of transportation corridors and development patterns should not exacerbate barriers to wildlife movement. CDFW recommends redesigning future projects to avoid impacts to the wildlife corridor, including future modifications to the SR-118 and SR-23.	Prior to Project activities	City of Moorpark /Applicant
MM-BIO-2- Wildlife Corridors- Studies	All future Projects tiered off the PEIR should conduct specific studies to understand how Project implementation will affect wildlife movement. CDFW recommends all future Projects analyze whether they would impact wildlife corridors and essential connectivity blocks within the entirety of the Project area. Impacts include but are not limited to: <ul style="list-style-type: none"> a) Direct impacts to, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, due to habitat loss (acreage lost) and fragmentation, narrowing of a wildlife corridor (acreage lost), introduction of barriers to wildlife movement; 	Prior to Project activities	City of Moorpark /Applicant

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	<p>b) Indirect impacts from increased noise, light, and human activity.; and</p> <p>c) An assessment on areas which would most benefit wildlife crossing and structures with consideration to past, present, and future Projects.</p> <p>CDFW recommends such an analysis be supported by studies to document wildlife activity and movement through Project area where development is proposed.</p>		
<p>MM-BIO-3- Wildlife Corridors- Land Acquisition</p>	<p>Policy COS-1.290 within the document mentions the exploration of acquisition of open space “including privately owned parcels located adjacent to or within recognized critical habitats and wildlife corridors.” This Policy should be rewritten into a mitigation measure to better ensure the preservation of important areas associated with wildlife movement. CDFW recommends the Applicant retain contiguous land parcels surrounding the Santa Monica-Sierra Madre corridor. If land within the boundaries of Moorpark is already protected, then acquisition should expand past the City boundaries to aid in the preservation of the corridor to the north and south. Land retained should be protected in perpetuity from encroachment and development to ensure the preservation of the Santa Monica-Sierra Madre wildlife corridor. The mitigation lands should be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094 (2012). Assembly Bill 1094 amended Government Code, sections 65965-65968. Under Government Code, section 65967(c), the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves. An appropriate non-wasting endowment should be provided for the long-term management of mitigation lands. A conservation easement and endowment funds</p>	<p>Prior to Project activities</p>	<p>City of Moorpark /Applicant</p>

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	should be fully acquired, established, transferred, or otherwise executed prior to implementing Project-related ground disturbing activities and prior to the County's issuance of grading permits.		
MM-BIO-4- Wildlife Corridors- Wildlife Crossings	If impacts to movement corridors occur, future Projects should also include plans to implement or help fund wildlife crossing structures or passages. Crossing designs should also be included as elements within Projects related to the expansion of the SR-23 and SR-118. Future Projects should provide minimum criterion for design features, dimensions, and locations of potential crossings and associated fencing.	Prior to Project activities	City of Moorpark /Applicant
MM-BIO-5- LSAA- Avoidance	All Projects tiered from the PEIR should avoid impacts to streams, wetlands and associated natural communities.	Prior to Project activities	City of Moorpark /Applicant
MM-BIO-6- LSAA- Notification	<p>Projects tiered from the PEIR that have the potential to impact streams or associated communities should provide written notification to CDFW pursuant to section 1600 <i>et seq.</i> of the Fish and Game Code. Based on this notification and other information, CDFW shall determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting the proposed activities. A notification package for a LSA may be obtained by accessing CDFW's web site at https://www.wildlife.ca.gov/conservation/lisa (CDFW 2023b). The notification to CDFW should provide the following information:</p> <ol style="list-style-type: none"> 1. A stream delineation in accordance with the U.S. Fish and Wildlife Service wetland definition adopted by CDFW; 2. Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Projects. This includes impacts as a result of routine maintenance and fuel modification. Plant 	Prior to Project activities	City of Moorpark /Applicant

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	<p>community names should be provided based on vegetation association and/or alliance per the Manual of California Vegetation (CNPS 2023);</p> <p>3. A discussion as to whether impacts on streams within subsequent Project sites would impact those streams immediately outside of the Project sites where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and,</p> <p>4. A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project sites. Additionally, the hydrological evaluation should assess a sufficient range of storm events (e.g., 100, 50, 25, 10, 5, and 2-year frequency storm events) to evaluate water and sediment transport under pre-Project and post-Project conditions.</p> <p>If necessary, CDFW’s issuance of an LSA Agreement for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document of the Lead Agency for the Project. To minimize additional requirements by CDFW pursuant to section 1600 <i>et seq.</i> and/or under CEQA, the CEQA document should fully identify the potential impacts to streams or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.</p>		
<p>MM-BIO-7-LSAA-Conditions</p>	<p>Any LSA Agreement issued for tiered off Projects by CDFW may include additional measures protective of streambeds on and downstream of the Project such as additional erosion and pollution control measures. To compensate for any on-site and off-site</p>	<p>Prior to Project activities</p>	<p>City of Moorpark /Applicant</p>

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	impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: avoidance of resources, on-site or off-site creation, enhancement, or restoration, and/or protection and management of mitigation lands in perpetuity.		
MM-BIO-8-Plant Mapping-Alliance/Association Naming- PEIR	The PEIR and all subsequent Projects tiered off the PEIR should provide a floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted. Future Project sites should map within the project footprint and fuel modification area. 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 (CDFW 2018c). The Manual of California Vegetation (MCV), should also be used to inform this mapping (CNPS 2023). The MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system. Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions. CDFW recommends the environmental document provide measures to fully mitigate the loss of individual ESA- and CESA-listed plants and habitat.	Prior to/ During Project activities	City of Moorpark /Applicant
MM-BIO-9-Plant Mapping-Alliance/Association Naming-Subsequent Projects	Future Projects should provide a detailed map (1:24,000 or larger) 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). Any identified rare plants should also be plotted within the map.	Prior to Project activities	City of Moorpark /Applicant

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MM-BIO-10- Natural Communities- Avoidance	<p>All future Projects tiered off the PEIR should avoid sensitive natural communities, including locally important communities such as oak woodlands and alliances that fall under the coastal sage scrub characterization.</p>	<p>Prior to Project activities</p>	<p>City of Moorpark /Applicant</p>
MM-BIO-11- Cumulative Assessments- Subsequent Projects	<p>Given the majority of the coastal sage scrub alliance communities will potentially be removed by the City of Moorpark by the year 2050, all future Projects tiered from the PEIR and future PEIRs should assess the cumulative impact of their Project.</p> <p>a) CDFW recommends future Projects and PEIRs analyze in depth and discuss the Project's direct impacts on sensitive habitats/open space within the Project area. The subsequent Projects/PEIRS should discuss loss of sensitive habitats/open space due to fuel modifications and introduction of nonnative, invasive plants facilitated by the Project (collectively, indirect impacts). All future Projects should disclose the acreage of sensitive habitats and open space that would be lost as a result of any subsequent development from the proposed Project, including all areas subject to fuel modifications and grading to accommodate development. CDFW also recommends Projects analyze and discuss the Project's potential impacts on conserved lands adjacent to the Project area.</p> <p>b) An analysis and discussion regarding the impact on special status species/communities as a result of direct/indirect impacts to sensitive habitats/open space. Species should include but not be limited to: coastal California gnatcatcher, mountain lion, Crotch's bumblebee (<i>Bombus crotchii</i>), Riverside fairy shrimp (<i>Streptocephalus woottoni</i>), and Lyon's pentachaeta (<i>Pentachaeta lyonia</i>). Analysis should include information on how removal or modification of sensitive habitats/opens space will impact movement, distribution, total acreage of available habitat (foraging, nesting, breeding), overall success of the species within the</p>	<p>Prior to Project activities</p>	<p>City of Moorpark /Applicant</p>

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	<p>City, and implications of success throughout its range. A discussion on local extirpation should be included if applicable.</p> <p>c) An analysis of impacts from land use designations and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included; and</p> <p>d) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.</p>		
REC-1- Santa Monica- Sierra Madre Corridor	<p>Projects tiered off the PEIR should not further block either branch of the corridor. CDFW recommends that the areas proposed for the extension of the SR-23 and the SR-118 bypass be preserved in perpetuity as open space and not be further developed or encroached upon (Figure 4). Protection of these areas would ensure the continued wildlife movement to and from Happy Camp Canyon to the riparian areas associated with Arroyo Simi under the 118 overpass and allow passage to the Tierja Rejada critical passage. Proper thresholds for sound, light, and buffers should be maintained.</p>	Prior to Project activities	City of Moorpark /Applicant
REC-2- Wildlife Corridors- SR-23 and SR- 118	<p>These Projects are related to the 1999 Moorpark Highlands Specific Plan and have a level of planning behind them. The current PEIR, future PEIRs, and Projects tiered off the PEIR should analyze the cumulative impacts of extending the SR-23 and 118 within these important movement areas as part of their analysis. The Applicant should consider current, planned, and</p>	Prior to Project activities	City of Moorpark /Applicant

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	future wildlife passage projects when analyzing Project impacts. Technical detail such as data, maps, diagrams, and similar relevant information should be provided to permit full assessment if significant environmental impacts by reviewing agencies and members of the public (CEQA Guidelines, §15147).		
REC-3- Wildlife Corridors- Datasets	Data sets to be considered within the analyses of Projects tiered from the PEIR should include, but not be limited to: Missing Linkages in California's landscape California Natural Diversity Database (CNDDDB) layer (ds420), South Coast Missing Linkages (ds419), and Essential Connectivity Areas (ds620). Based on these datasets, the Projects should identify areas of possible impact. The Projects should also consider the South Coast Missing Linkages projected "least cost" linkage designs for the South Coast Ecoregion (South Coast Wildlands 2008 & Penrod 2006). Subsequent Projects should also review CDFW's Priority Wildlife Movement Barrier locations report (CDFW 2020a) and National Park Service's (NPS) collar data relating to mountain lion.	Prior to/ During Project activities	City of Moorpark /Applicant
REC-4- Alliance Plant Mapping- Recirculation	The document should be updated with alliance-based mapping and recirculated for public review.	Prior to Project activities	City of Moorpark /Applicant
REC-5- Locally Important Species and Habitats	CDFW recommends adding language regarding locally important species and habitats to BIO-2. Natural communities including but not limited to coastal sage scrub communities and oak woodland communities are considered locally important and should be appropriately mitigated for in subsequent Projects. Projects may also want to review Ventura County's Locally Important Species List (CVRMA 2022).	Prior to Project activities	City of Moorpark /Applicant
REC-6- Preservation of Open Space	CDFW recommends the remaining open spaces be protected in perpetuity especially those that aid permeability for wildlife, are associated with riparian communities, and those that include habitat important to special status wildlife and plant species. This includes but is not limited to, the open space directly above the Hitch Ranch Specific Plan site as it has been documented to be	Prior to Project activities	

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	high quality habitat for coastal California gnatcatcher (Impact Sciences 2022). As well as open spaces related to the Santa Monica-Sierra Madre wildlife corridor and the Tierra Rejada Critical Passage.		
REC-7- Woodland Restoration Plan	<p>Prior to removing any oak or the understory vegetation, any Projects tiered off the PEIR should prepare a Woodland Restoration Plan. The Woodland Restoration Plan should prescribe the following:</p> <ol style="list-style-type: none"> 1. Species-specific planting methods; 2. Planting schedule; 3. Measures to control exotic vegetation and protection from herbivory; 4. Measurable goals and success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover). Measurable success criteria should be based on site/habitat conditions prior to impact and/or functional local native oak shrublands/woodlands as reference sites; 5. Contingency measures if the success criteria is not met; 6. Long-term monitoring for at least 10 years, with a minimum of seven years without supplemental irrigation; 7. Adaptive management techniques, including replacement plants if necessary; and 8. Annual reporting criteria and requirements. 	Prior to Project activities	City of Moorpark /Applicant
REC-8- Fuel Modification	If Projects tiered off the PEIR include fuel modification, CDFW recommends that the final environmental documents 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 do not allow for the introduction of invasive Argentine ants. Monitoring should also include parameters	Prior to Project activities	City of Moorpark /Applicant

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	to identify possible introduction of Argentine ants.		
REC-9-Weed Management	Weed management plans should be developed for Projects tiered off the PEIR for all Project areas and implemented both during, and for at least 3 years post-Project. Non-native weeds including noxious weeds (as listed by the California Invasive Plant Council) (CALIPC 2022) should be prevented from becoming established to control the local spread of invasive plants, both during and after construction. Site visits should be conducted monthly and weekly during the rainy season. The Project areas should be monitored via mapping for new introductions and expansions of non-native weeds. Annual threshold limits, eradication targets, and monitoring should be included in this plan. Monitoring for spread of invasive weeds to adjacent lands should also be included.	Prior to Project activities	City of Moorpark /Applicant
REC-10-In-lieu Fees	In-lieu fees can be considered a type of deferred mitigation. Future Projects should utilize alternative methods of mitigation such as restoration, enhancement, and acquisition of lands to be protected in perpetuity.	Prior to Project activities	City of Moorpark /Applicant
REC-11-Vegetation Table 5.4-1	Within table 5.4-1 of the PEIR Arundo (<i>Arundo donax</i>) is listed as a plant community. Arundo is listed on the California Invasive Plant Council's Invasive Plant List. It should not be included within the vegetation table, CDFW is only concerned with the removal of native plant communities.	Prior to Project activities	City of Moorpark /Applicant
REC-12-Invasive Pests and Pathogens	Any future Projects that remove vegetation that could host pest species should 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 (TCD 2021), polyphagous shot hole borer (UCANR 2018), and goldspotted oak borer (UCIPM 2021). If invasive pests and/or diseases are detected, the subsequent Projects should provide an infectious tree disease management	Prior to Project activities	City of Moorpark /Applicant

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	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(s) without first being treated using best available management practices relevant for each tree disease observed.		
REC-13- MMRP	Per Public Resources Code section 21081.6(a)(1), CDFW has provided the District 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 shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.	Prior to Project activities	City of Moorpark /Applicant