

March 2023 | Final Environmental Impact Report
State Clearinghouse No. 2022050327

MOORPARK GENERAL PLAN 2050

for City of Moorpark

Prepared for:

City of Moorpark

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1. Introduction

1.1 INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §§ 21000 et seq.) and CEQA Guidelines (California Code of Regulations §§ 15000 et seq.).

According to the CEQA Guidelines, Section 15132, the Final EIR shall consist of:

- (a) The Draft EIR or a revision of the Draft;
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the Draft EIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

This document contains responses to comments received on the Draft EIR for the Moorpark General Plan 2050 during the public review period, which began December 22, 2022, and closed February 6, 2023. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated Draft EIR comprise the Final EIR, in accordance with CEQA Guidelines, Section 15132.

1.2 FORMAT OF THE FINAL EIR

This document is organized as follows:

Section 1, Introduction. This section describes CEQA requirements and content of this Final EIR.

Section 2, Response to Comments. This section provides a list of agencies and interested persons commenting on the Draft EIR; copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number (A-1 through A-6 for letters received from agencies and organizations, and I-1 through I-3 for letters received from individuals). Individual comments have been numbered for each letter and the letter is followed by responses with references to the corresponding comment number.

1. Introduction

Section 3. Revisions to the Draft EIR. This section contains revisions to the Draft EIR text and figures as a result of the comments received by agencies and interested persons as described in Section 2, and/or errors and omissions discovered subsequent to release of the Draft EIR for public review.

The responses to comments contain material and revisions that will be added to the text of the Final EIR. Moorpark staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the Draft EIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

Written responses are prepared consistent with Section 15088 of Title 14 of the California Code of Regulations. Pursuant to this section, the level of detail contained in the response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this Final EIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on Draft EIRs.

2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency (City of Moorpark) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft EIR and prepare written responses. This section provides written responses to written comments received on the Draft EIR and the City of Moorpark's responses to each comment. Comment letters and specific comments are given letters and numbers for reference purposes.

The following is a list of agencies and persons that submitted comments on the Draft EIR during the public review period.


Number Reference	Commenting Person/Agency	Date of Comment	Page No.
Agencies & Organizations			
A1	California Department of Transportation (Caltrans)	January 16, 2023	2-3
A2	Santa Ynez Band of Chumash Indians	January 31, 2023	2-7
A3	California Department of Fish and Wildlife	February 3, 2023	2-11
A4	County of Ventura	January 25, 2023	2-61
A5	Ventura County Fire Department	February 6, 2023	2-65
A6	Ventura County Air Pollution Control District	February 6, 2023	2-81
Individuals			
I1	Dr. Mark Di Cecco	February 3, 2023	2-87
I2	John W. Newton	February 6, 2023	2-91
I3	Dr. Roseann Mikos	February 6, 2023	2-101

2. Response to Comments

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2. Response to Comments

LETTER A1 – California Department of Transportation (2 page[s])

<p style="font-size: small; margin: 0;">STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY</p> <p>DEPARTMENT OF TRANSPORTATION DISTRICT 7- OFFICE OF REGIONAL PLANNING 100 S. MAIN STREET, SUITE 100 LOS ANGELES, CA 90012 PHONE (213) 897-0067 FAX (213) 897-1337 TTY 711 www.dot.ca.gov</p>	<p style="font-size: small; margin: 0;">Gavin Newsom, Governor</p>  <p style="font-size: x-small; margin: 0;"><i>Making Conservation a California Way of Life.</i></p>
<p>January 16, 2022</p> <p>Doug Spondello, AICP Deputy Community Development Director 799 Moorpark Avenue Moorpark, CA 93021</p> <p style="text-align: right;">RE: City of Moorpark General Plan Update – Draft Environmental Impact Report (DEIR) SCH# 2022050327 GTS# 07-VEN-2022-00527 Vic. VEN Multiple</p> <p>Dear Doug Spondello,</p> <p>Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The City of Moorpark is preparing a comprehensive update to its existing General Plan for the implementation of the Moorpark General Plan 2050. The plan is intended to foster a diversity of well-planned districts and corridors containing an integrated network of commercial, office, and housing to reduce automobile use, improve equitable access to transit, and employ best practices for environmental sustainability and carbon reduction. Eight significant and unavoidable adverse impacts have been identified in this DEIR, including Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources (Historic Resources), GHG Emissions, Hazards and Hazardous Materials (Wildfire), Noise, and Wildfire.</p> <p>After reviewing the DEIR, Caltrans has the following comments:</p> <p>As supported by Table 5.8-5 City of Moorpark GHG Emissions Forecast, the EIR’s analysis of the project indicates conflict with the GHG reduction goals established under AB 1279 and EOB-55-18. Reduction strategies to meet the long-term 2045 GHG reduction goal are needed, in addition to future establishment of a 2050 reduction target. The majority of emissions listed in Table 5.8-5 are from building natural gas usage (26 percent) and on-road transportation (26 percent). Caltrans concurs with the following policy under Conservation Element Goal 8 to limit greenhouse gas emissions from city operations by reducing idling and number of trips by city staff and vehicles. Other listed measures include improving upon efficiency for routing city staff and vehicles, and increasing usage of public transportation, carpooling, and electric vehicles by city staff. Although GHG emissions are declared significant and unavoidable, it is recommended that the project follow the suggested Mitigation Measure to adopt the Moorpark General Plan 2050 Conservation Element Policy COS-8.2, which would require the city to collaborate with regional partners to</p>	
<p style="font-size: x-small; margin: 0;"><i>“Provide a safe and reliable transportation network that serves all people and respects the environment”</i></p>	

A1-Intro

A1-1

2. Response to Comments

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develop and implement a Climate Action Plan to meet the GHG reduction goals of SB 32 and AB 1279 for progress towards the State's carbon neutrality goals for year 2045.

A1-1
cont'd

As stated in the Caltrans' Notice of Preparation Letter, Caltrans encourages the implementation of Transportation Demand Management (TDM) strategies as an alternative to building excess parking. Caltrans concurs with both Policy CI-6.4 to develop a program for TDM fund expenditure, and Policy CI-7.1 to employ parking management strategies, such as shared parking in mixed use areas, on-street residential parking, and spill-over parking to avoid unnecessary parking construction. Reducing the amount of car parking supplied acts against enabling driving over other methods of transit. Research indicates that removing car parking is a proven method of reducing trip demand, improving housing affordability, and encouraging active modes of transportation.

A1-2

Caltrans also concurs with the project's listed policies for improvement of the bikeway network to close gaps and ensure continuity with existing active transportation and transit infrastructure. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. These elements can help the Moorpark General Plan 2050 meet its objectives as well as Caltrans' targets of tripling trips made by bicycle, doubling trips made by walking and public transit, and a 15% reduction in statewide VMT. By removing barriers to walking, biking, and taking transit, this Plan can engage Californians in shifting towards transit-oriented communities, and help the State meet its policy goals to reduce the number of trips made by driving, Greenhouse Gas (GHG) emissions, and provide for multimodal transport options.

A1-3

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-VEN-2022-00527.

Sincerely,



MIYA EDMONSON
LDR Branch Chief

cc: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment"

2. Response to Comments

A1. **Response to Comments from Miya Edmonson, LDR Branch Chief, California Department of Transportation (Caltrans), Dated January 16, 2023.**

- A1-Intro The comment serves as an opening remark. See Appendix A, Notice of Preparation and Comment Letters, of the Draft EIR, for a copy of the California Department of Transportation (Caltrans) Notice of Preparation (NOP) comment letter. The comment does not address the adequacy of the Draft EIR, and no further response is required. Responses to comments on the adequacy of transportation in the Draft EIR can be found in response to Comment A1-1 through A1-3.
- A1-1 Caltrans requests making Policy COS-8.2 a mitigation measure. The policies in the Moorpark General Plan 2050 are part of the project and are not considered mitigation. City policies, actions, and codes, presented in this program EIR will minimize impacts, and development projects will inherently implement these measures.
- A1-2 Caltrans concurs with policies related to Transportation Demand Management (TDM) strategies in the Moorpark General Plan 2050. The comment does not address the adequacy of the Draft EIR, and no further response is required.
- A1-3 Caltrans concurs with policies related to improvement of the bikeway network to close gaps and ensure continuity with existing active transportation and transit infrastructure in the Moorpark General Plan 2050. The comment does not address the adequacy of the Draft EIR, and no further response is required.

2. Response to Comments

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2. Response to Comments

LETTER A2 – Santa Ynez Band of Chumash Indians (1 page[s])



Santa Ynez Band of Chumash Indians
Tribal Elders' Council

P.O. Box 517 ♦ Santa Ynez ♦ CA ♦ 93460
Phone: (805)688-7997 ♦ Fax: (805)688-9578 ♦

January 31, 2023

City of Moorpark
799 Moorpark Avenue
Moorpark, Ca 93021

Att.: Doug Spondello, Deputy Community Development Director

Re: The Moorpark General Plan 2050 Program (DEIR)

Dear Mr. Spondello:

Thank you for contacting the Tribal Elders' Council for the Santa Ynez Band of Chumash Indians.

At this time, the Elders' Council requests no further consultation on this project; however, we understand that as part of NHPA Section 106, we must be notified of the project.

Thank you for remembering that at one time our ancestors walked this sacred land.

Sincerely Yours,

Crystal Mendoza

Crystal Mendoza
Administrative Assistant | Cultural Resources
Santa Ynez Band of Chumash Indians | Tribal Hall
(805) 325-5537
cmendoza@chumash.gov

A2-1

2. Response to Comments

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2. Response to Comments

A2. Response to Comments from Crystal Mendoza, Administrative Assistant, Santa Ynez Band of Chumash Indians, Dated January 31, 2023.

A2-1 The commenter indicates that no further consultation on this project is requested by the Santa Ynez Band of Chumash Indians. The comment does not address the adequacy of the Draft EIR, and no further response is required.


2. Response to Comments

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2. Response to Comments


LETTER A3– California Department of Fish and Wildlife (31 page[s])

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



February 3, 2023

Mr. Doug Spondello
City of Moorpark
799 Moorpark Avenue
Moorpark, CA 93021
DSpondello@moorparkca.gov

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.

A3-Intro

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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

A3-Intro
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A3-1

2. Response to Comments

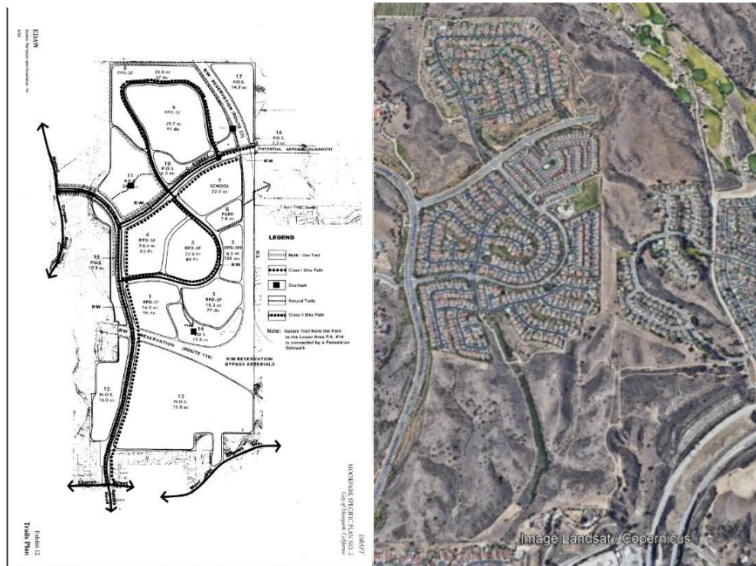
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chokepoint and increase road strikes (*Figure 2*). The western branch of the corridor leads to the current SR-118 overpass to the southeast, where wildlife can utilize the riparian areas associated with Arroyo Simi to travel into the Tierra Rejada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

A3-1
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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).

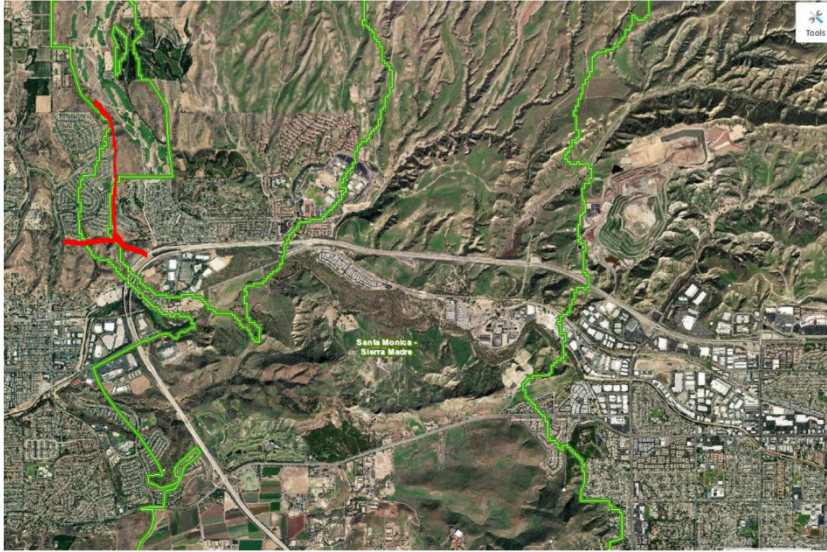
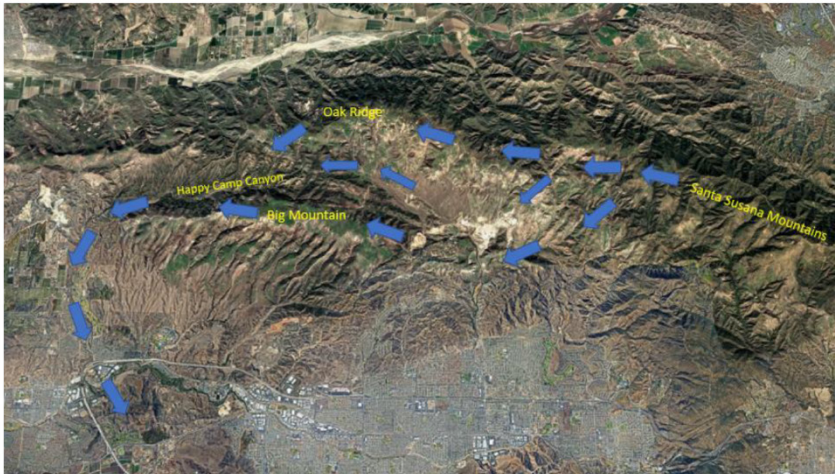


Figure 2. Imagery of the Santa Monica-Sierra Madre corridor (green) traversing Moorpark. The western branch is already severely impacted, proposed extension of the SR-23 and SR-118 (alignment approximated in red) would completely block the corridor.



A3-1
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2. Response to Comments

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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.

A3-1
cont'd

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.

A3-2

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.

A3-3

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

A3-4

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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.

A3-4
cont'd

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.

A3-5

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.

A3-6

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

A3-7

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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.

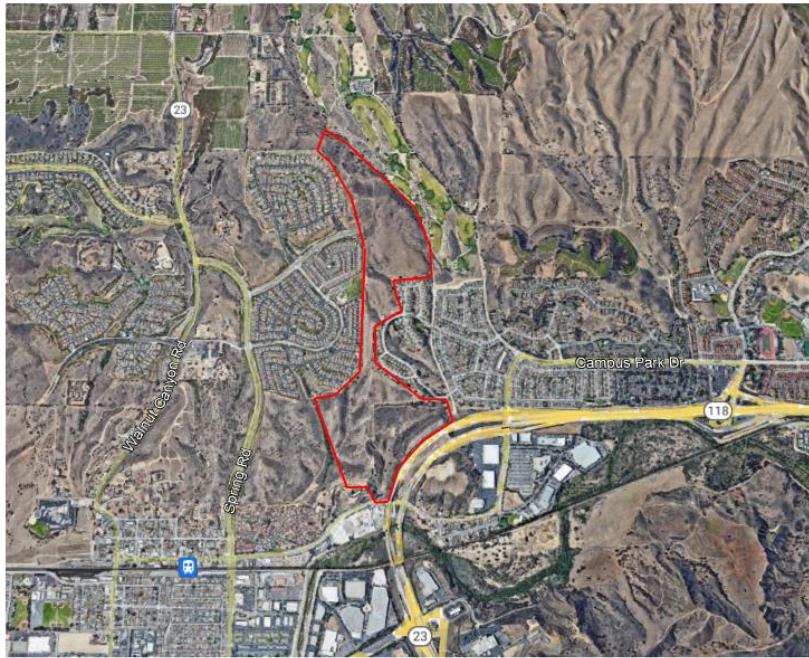


Figure 4. Areas outlined in red should be protected in perpetuity from development and encroachment. Last traversable area of the western branch of the Santa Monica-Sierra Madre wildlife corridor. This area offers connectivity to Happy Camp Canyon to the Tierra Rejada critical passage.

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

A3-7
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A3-8

A3-9

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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.

A3-9
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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.

A3-10

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,

A3-10
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A3-11

A3-12

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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.

A3-12
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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.

A3-13

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.

A3-14

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.

A3-14
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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.

A3-15

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.

A3-16

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

A3-17

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.

A3-18

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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 (*Poliioptila 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.

A3-18
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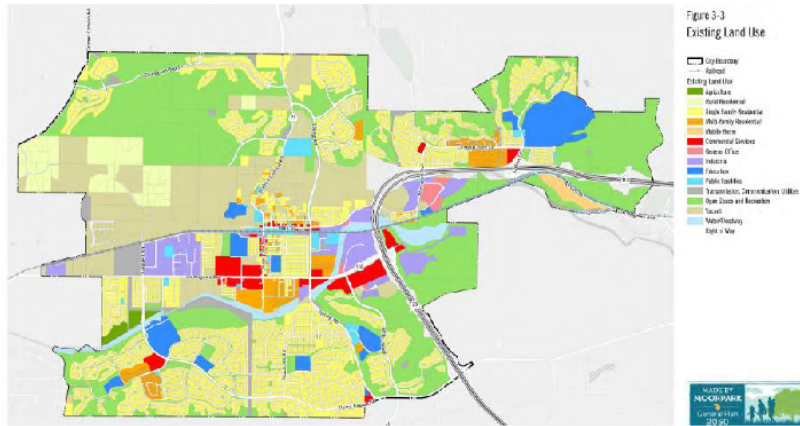
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Table 2. Alliance communities that are possible under the “mixed scrub” category.

Mixed Scrub			1894.9
<i>Artemisia californica</i>	California sagebrush scrub	S4	
<i>Artemisia californica – Erigonum fasciculatum</i>	California sagebrush – California buckwheat scrub	S4	
<i>Artemisia californica – Salvia leucophylla</i>	California sagebrush – purple sage scrub	S4	
<i>Artemisia californica – Salvia mellifera</i>	California sagebrush – black sage scrub	S4	
<i>Baccharis pilularis</i>	Coyote brush scrub	S5	
<i>Baccharis pilularis alliance</i>	Coyote brush scrub	S5	
<i>Encelia californica</i>	California brittle bush scrub	–	
<i>Erigonum 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 alliance</i>	Laurel sumac scrub	S4	
<i>Opuntia littoralis alliance</i>	Coast prickly pear scrub	S3	
<i>Opuntia spp.</i>	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 alliance</i>	Purple sage scrub	S4	
<i>Salvia mellifera</i> 1	Black sage scrub	S4	
<i>Salvia mellifera – Salvia leucophylla alliance</i>	Sage scrub	S4	



A3-18
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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.

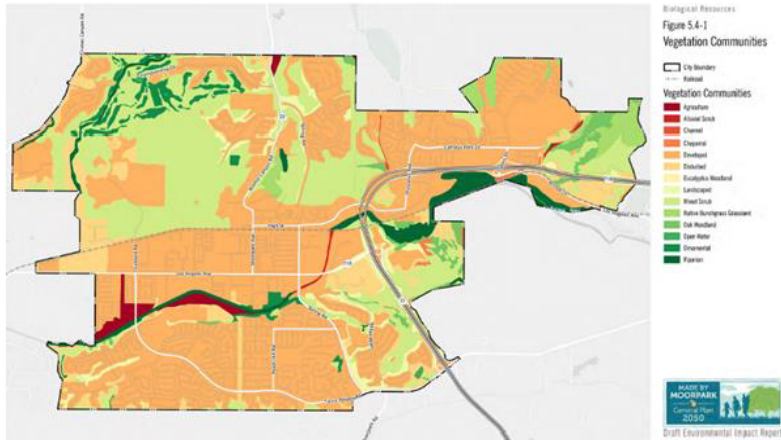


Figure 6. Provided vegetation map within the PEIR. The majority of Moorpark's mixed scrub (lime green) align with "vacant and undeveloped" parcels (tan in Figure 5) and may be removed as part future Project activities. These areas are denoted by different colors (light sand/beige and stripes) within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

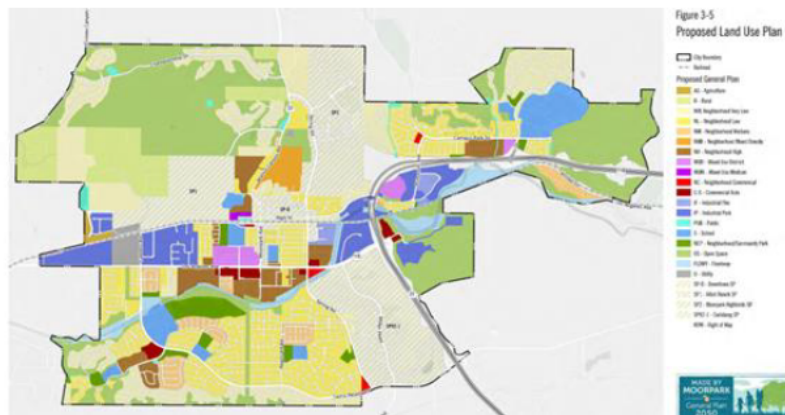


Figure 7. Provided proposed land use map within the PEIR. Vacant lots (tan in Figure 5) are now newly characterized within the legend to denote future development. Striped areas are associated with Specific Plans and light sand/beige with neighborhood (very low).

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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.

A3-19

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.

A3-20

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.

A3-21
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- 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).

A3-22

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.

A3-23

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

A3-24

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

A3-24
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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.

A3-25

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.

A3-26

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.

A3-27

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.

A3-28

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.

A3-29

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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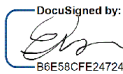
Filing Fees

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:

B6E58CFE24724F5...

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

References:

Bailey, E.A. and Mock, P.J. 1998. Dispersal Capability of the California Gnatcatcher: A Landscape Analysis of Distribution Data. Accessed from:
[https://archive.westernfieldornithologists.org/archive/V29/29\(4\)-p0351-p0360.pdf](https://archive.westernfieldornithologists.org/archive/V29/29(4)-p0351-p0360.pdf)

Block, W.M., Morrison, M.M., Verner, J. 1990. Wildlife and oak-woodland interdependency. *Fremontia* 18(3):72-76.

[CalEPA] California Environmental Protection Agency, California Natural Resources Agency, California Department of Food and Agriculture, California Air Resources Board, and California Strategic Growth Council. 2019. January 2019 Draft California 2030 Natural and Working Lands Climate Change Implementation Plan. Available from:
<https://ww2.arb.ca.gov/resources/documents/nwl-implementation-draft>

A3-Concl.

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[CALIPC] California Invasive Plant Council. 2022. Invasive Plants. Accessed at: [Invasive Plants – California Invasive Plant Council \(ca-ipc.org\)](#)

[CaPIF] California Partners in Flight. 2002. Version 2.0. The oak woodland bird conservation plan: a strategy for protecting and managing oak woodland habitats and associated birds in California (S. Zack, lead author). Point Reyes Bird Observatory, Stinson Beach, CA. Available from: <http://www.prbo.org/calpif/plans.html>

[CDFWa] California Department of Fish and Wildlife. 2022. Priority Wildlife movement Barrier Locations by Region. Accessed from: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=178511>

[CDFWb] California Department of Fish and Wildlife. 2022. Lake and Streambed Alteration Program. Available from: <https://wildlife.ca.gov/Conservation/LSA>

[CDFWc] California Department of Fish and Wildlife. 2018. CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available from: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959>

[CDFWd] California Department of Fish and Wildlife. 2019. Areas of Conservation Emphasis (ACE): [Areas of Conservation Emphasis \(ACE\) \(ca.gov\)](#)

[CNPS] California Native Plant Society. 2023. Manual of California Vegetation. Available from: <https://www.cnps.org/vegetation/manual-of-california-vegetation>

[CVRMA] County of Ventura Resource Management Agency. 2022. Ventura County Locally Important Species List: [Ventura County Locally Important Species List \(vcрма.org\)](#)

Dickson B. G., Jennes J. S., Beier P. 2005. Influence of Vegetation, Topography, and Roads on Cougar Movement in Southern California. Available from: https://www.researchgate.net/publication/232686785_Dickson_BG_Jennes_JS_Beier_P_Influence_of_vegetation_topography_and_roads_on_cougar_movement_in_southern_California_J_Wildl_Manage_69_264-276

EcoAdapt. 2017. Southern California Sage Scrub Habitats Climate Change Vulnerability Assessment Synthesis. Available from: http://ecoadapt.org/data/documents/EcoAdapt_SoCalVASynthesis_SageScrub_FINAL2_017.pdf

Griffin and Muick. 1990. California Native Oaks: Past and Present. *Fremontia* 18(3): 4-12.

Jennings, M. and Lewison R. 2013. Planning for Connectivity Under Climate Change: Using Bobcat Movement To Assess Landscape Connectivity Across San Diego County's Open Space. Available from: http://www.conservationecologylab.com/uploads/1/9/7/6/19763887/jennings-lewison_blasker_final_report2013.pdf

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Impact Sciences. 2022. Draft Environmental Impacts Report for the Proposed Hitch Ranch Specific Plan. Pages 3.3-8, 3.3-37, 3.3-44, and 3.3-68. Accessed from: https://files.ceganet.opr.ca.gov/253052-3/attachment/8xwCZaHyJHDIdxCIJfHWGlaolqVNMc_HL9XW05QAz_bEYxiH6VYUlaAMnPwgJHAtQPZx0WIL5NZmpz0

Penrod, K., C. Cabañero, P. Beier, C. Luke, W. Spencer, E. Rubin, R. Sauvajot, S. Riley, and D. Kamradt. 2006. South Coast Missing Linkages Project: A Linkage Design for the Santa Monica-Sierra Madre Connection. Produced by South Coast Wildlands, Idyllwild, CA., in cooperation with National Park Service, Santa Monica Mountains Conservancy, California State Parks, and The Nature Conservancy. Available from: https://conservationcorridor.org/cpb/Penrod_et_al_2006-SantaMonica_SierraMadre.pdf

South Coast Wildlands. 2008. South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion. Produced in cooperation with partners in the South Coast Missing Linkages Initiative. Available online at <http://www.scwildlands.org>

[TCD] Thousand Cankers Disease. 2021. What is Thousand Cankers? Available from: <https://thousandcankers.com/>

[UCANR] UC Agriculture and Natural Science. 2018. Managing Invasive Shot Hole Borers in Southern California. Available from: <https://ucanr.edu/blogs/blogcore/postdetail.cfm?postnum=28508>

[UCIPM] UC Integrated Pest Management Program. 2021. Goldspotted Oak Borer. Available from: <http://ipm.ucanr.edu/PMG/PESTNOTES/pn74163.html>

[USFWS] United States Fish and Wildlife Service. 2022. Coastal California Gnatcatcher. Available from: <https://www.fws.gov/story/coastal-california-gnatcatcher>
<https://www.fws.gov/sites/default/files/documents/survey-protocol-for-coastal-californiagnatcatcher.pdf>

Vandergast, A., Kus, B., Preston, K., & Barr, R. 2019. Distinguishing recent dispersal from historical genetic connectivity in the coastal California gnatcatcher. Available from: <https://www.nature.com/articles/s41598-018-3712-2>

Ventura County. 2019. Ordinance No. 4537. Available from: https://docs.vcrma.org/images/pdf/planning/HWCWC/Ordinance_4537.pdf

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State of California – Natural Resources Agency
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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: 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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	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	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/lsa (CDFW 2023b). The notification to CDFW should provide the following information: <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	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.	Prior to Project activities	City of Moorpark /Applicant
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>	Prior to Project activities	City of Moorpark /Applicant

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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 of 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 (CNDDB) 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

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2. Response to Comments

A3. Response to Comments from Erinn Wilson-Olgin, Environmental Program Manager I, South Coast Region, California Department of Fish and Game, Dated February 3, 2023.

A3-Intro The comment serves as an opening remark. See Appendix A, *Notice of Preparation and Comment Letters*, of the Draft EIR, for a copy of the California Department of Fish and Wildlife (CDFW) Notice of Preparation (NOP) comment letter. The comment does not address the adequacy of the Draft EIR, and no further response is required. Responses to comments on the adequacy of the biological resources evaluation in the Draft EIR can be found in response to Comment A3-1 through A3-30.

A3-1 Section 5.4, *Biological Resources*, Impact 5.4-4 identifies potential impacts associated with wildlife movement. As identified on page 5.4-28 through 5.4-32, under “Wildlife Movement Corridors and Linkages” wildlife movement through the Santa Monica-Sierra Madre connection is restricted by the existing Moorpark College and residential developments. The western branch is also fragmented by existing industrial development and residential development, including the Highland Specific Plan.

It should be noted that the Moorpark General Plan 2050 Circulation Element does not include the extension of State Route (SR)-23 or SR-118 North Hills Parkway bypass (see Figure 5.17-1, *Moorpark Roadway Network*). The EIR briefly discusses consistency of the Circulation Plan with projects identified in the Southern California Association of Government’s (SCAG) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (see pages 5.17-18 to 5.17-19). However, these potential future projects are not part of the Moorpark General Plan 2050 proposed project and are considered speculative. See also Implementation Actions CI-I4 and CI-I14:

- **CI-I4 Agency Coordination.** Provide Staff-Level Coordination with Ventura County, Ventura County Transportation Commission, California Highway Patrol and Caltrans to achieve consistency between regional and local transportation improvements and the General Plan and accomplish the city’s future transportation goals. Coordinate with SCAG to update the SCS/RTP to reflect the North Hills Parkway project as an arterial roadway without the direct connection to the SR-118 Freeway.
- **CI-I14 Study SR-23 Bypass or Alternative Use.** Evaluate whether a bypass of SR-23 from the vicinity of the future North Hills Parkway east of Spring Road north to Broadway Road should be pursued by the city or whether an alternative use or uses would be appropriate for lands previously dedicated to that use.

If these projects move forward further environmental review would be required pursuant to CEQA and the National Environmental Quality Act (NEPA).

Furthermore, the Moorpark General Plan 2050 is a policy-level document that does not include any development projects. The certification of the EIR or the approval of the

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Moorpark General Plan 2050 does not approve or deny any potential future development in the city.

The Moorpark Highland Specific Plan II was adopted in June 1999. Based on the City's review of the Specific Plan buildout, the plan is fully built out. Future development within the Moorpark Highlands Specific Plan II would need to undergo additional environmental review by the city prior to development in accordance with city procedures, including review under CEQA. When a new development project is filed with the city, it is reviewed for completeness and consistency with the Moorpark General Plan 2050 goals, policies, and actions, and city codes and practices. Because city policies, actions, and codes, presented in this program EIR will minimize impacts, development projects will inherently implement these measures to: (a) mitigate environmental impacts and (b) achieve consistency with the Moorpark General Plan 2050 and compliance with city codes. Pursuant to CEQA and the CEQA Guidelines, where the "project" subject to CEQA is a "plan, policy, regulation, or other public project," the obligation to mitigate impacts can be effectuated "by incorporating the mitigation measures into the plan, policy, regulation, or project design." (Public Resources Code, Section 21081.6(b); CEQA Guidelines, Section 15126.4(a)(2)).

The proposed project is a program-level evaluation of the land use and policies identified in the Moorpark General Plan 2050. The Draft EIR included a program-level evaluation of biological resources in the city. The program-level Biological Resources evaluation was included as Appendix E of the Draft EIR. The Draft EIR (and technical Appendix E) included a map of the Regional Wildlife Corridors in the city, including the Santa Monica – Sierra Madre Connection and the Tierra Rejada Critical Wildlife Passage Area (CWPA).

As described in Section 3.6, *Intended Uses of the EIR*, in Chapter 3, *Project Description*, of the Draft EIR, this EIR is intended to review potential environmental impacts associated with the adoption and implementation of the proposed project and determine corresponding mitigation measures, as necessary. This EIR is a program-level EIR and does not evaluate the impacts of specific, individual developments that may occur under the buildout horizon of the Moorpark General Plan 2050. Each specific future project will conduct separate environmental review, as required by CEQA, to secure the necessary discretionary development permits. Therefore, while subsequent environmental review may be tiered off this EIR, this EIR is not intended to address impacts of individual projects. Subsequent projects will be reviewed by the city for consistency with the Moorpark General Plan 2050 and this EIR. Because the Moorpark General Plan 2050 is a program level evaluation, the specific details of future projects and the conditions at the time they are proposed are not known, it would be speculative to estimate any potential long-term or permanent changes, including those to the regulatory setting, and CEQA does not condone speculation (CEQA Guidelines Section 15145).

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As a result, it would be speculative to include an assessment at the level of detail requested by CDFW for this program-level evaluation. Rather, the EIR includes mitigation measures, such as Mitigation Measure BIO-8 for habitat connectivity/wildlife corridor protection to avoid critical linkages, provide buffers, follow shielding lighting requirements, and other features that would need to be integrated into the design of projects in the city to minimize and avoid impacts. Mitigation Measure BIO-8 specifies measures to be taken, to minimize impacts on wildlife movement and preserve viable linkages in place to ensure less than significant impacts. CDFW acknowledges that Mitigation Measure BIO-8 provides appropriate measures to reduce choke points. Additionally, Mitigation Measures BIO-1(a-d) and BIO-2 are also applicable to Impact 5.4-4.

Additionally, new development would be reviewed under the Moorpark General Plan 2050 goals, policies, and actions, which include goals and policies to minimize impacts associated with noise, light, and vibration, including:

- **Policy COS-1.18 Wildlife corridors.** Adopt land use regulations that consider, complement and support state, regional, and county-adopted wildlife corridors, including the Ventura County Wildlife Corridor Overlay Zone and evaluate the appropriateness of designating additional corridors.
- **Policy COS-1.20 Open space acquisition.** Explore acquisition of new open space areas, including privately owned parcels located adjacent to or within recognized critical habitats and wildlife corridors.

A3-2

See response to Comment A3-1 regarding wildlife movement. Growth under the Moorpark General Plan 2050 is regulated by the City of Moorpark’s Municipal Code and Zoning. The Commenter cites an Overlay Zone adopted by Ventura County and the County’s Ordinance No. 4537. Projects within the incorporated city are not subject to the county’s ordinances. Section 5.4.1, *Environmental Setting*, under “Local Regulations”, identifies the applicable zoning and Municipal Code regulations in Moorpark. This includes Chapter 17.74 of the Moorpark Municipal Code for the Moorpark Highland Specific Plan Habitat Conservation Plan. Moreover, the following Policy of the Moorpark 2050 General Plan supports the CDFW’s request to adopt a local ordinance similar to that of the County’s:

- **Policy COS-1.18 Wildlife corridors.** Adopt land use regulations that consider, complement and support state, regional, and county-adopted wildlife corridors, including the Ventura County Wildlife Corridor Overlay Zone and evaluate the appropriateness of designating additional corridors.

The Draft EIR considered the CDFW’s comments on the NOP and included the requested measures as part of Mitigation Measure BIO-8. Similar to the County

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Ordinance, Mitigation Measure BIO-8 requires an evaluation of impacts to the Santa Monica-Sierra Madre Connection, and requires new development to include measures such as:

- Adhere to the applicable zoning standards.
- Encourage clustering of development.
- Avoid known sensitive biological resources and protect critical linkage areas in place with a minimum 1/2-mile buffer around pinch points, to maximum extent practicable).
- Require new or modified road crossings over streams, wetlands and riparian habitats to include bridging design features with bridge columns located outside the riparian habitat areas, when feasible.
- Avoid removal of native trees; large, dense-canopied nonnative trees; and understory vegetation. If impacts to trees cannot be avoided, trees should be replaced.
- Follow the existing shielded lighting requirements in the existing municipal code to provide reduced lighting adjacent to sensitive habitat areas.
- Encourage development plans that maximize wildlife movement.
- Provide buffers between development and wetland/riparian areas.
- Protect wetland/riparian areas through regulatory agency permitting process.
- Encourage wildlife-passable fence designs (e.g., 3-strand barbless wire fence) on property boundaries.
- Encourage preservation of native habitat on the undeveloped remainder of developed parcels.
- Minimize road/driveway development to help prevent loss of wildlife due to roadkill and habitat loss.
- Use native, drought-resistant plant species and trees in landscape design. Trees may include coast live oak (*Quercus agrifolia*) and California sycamore (*Platanus racemosa*) and other plants identified by the Audubon Society's Plants for Birds.
- Encourage participation in local/regional recreational trail design efforts.

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CDFW's concerns are adequately addressed by Mitigation Measure BIO-8 which is consistent with Ventura County Ordinance 4537 and prevents the undermining of regional conservation efforts as it requires that the city continue to work in partnership with the County of Ventura, wildlife agencies, organizations and entities responsible for the protection, management, and enhancement of habitat connectivity and wildlife corridors. Mitigation Measure BIO-8 specifies measures to be taken, to minimize impacts on wildlife movement and preserve viable linkages in place to ensure less than significant impacts. CDFW acknowledges that Mitigation Measure BIO-8 provides appropriate measures to reduce choke points. Thus, the proposed project would not create a chokepoint to wildlife movement.

- A3-3 CDFW requests additional mitigation language incorporated into the EIR for placement of transportation corridors and development patterns. As identified above, the proposed project does not include modifications to SR-118 and SR-23 (see Figure 5.17-1, *Moorpark Roadway Network*, and Implementation Actions CI-I4 and CI-I14). Additionally, Mitigation Measure BIO-8 includes the recommended language requested by CDFW to avoid, to the extent possible, further encroachment into the Santa Monica – Sierra Madre connection.
- A3-4 CDFW requests additional mitigation language incorporated into the EIR to ensure enough space for wildlife movement and request project-level studies to evaluate direct and indirect impacts to wildlife corridors. Mitigation Measure BIO-8 includes the recommended language request by CDFW for project-level studies. At the request of the CDFW, Mitigation Measure BIO-8 has been revised to include the additional requested language. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A3-5 CDFW requests making Policy COS-1.290 a mitigation measure. The policies in the General Plan are part of the project and are not considered mitigation. City policies, actions, and codes, presented in this program EIR will minimize impacts, and development projects will inherently implement these measures. Furthermore, the city does not have jurisdiction beyond its city boundary. See also response to Comment A3-2 regarding Chapter 17.74 of the Moorpark Municipal Code for the Moorpark Highland Specific Plan Habitat Conservation Plan.
- A3-6 CDFW requests additional mitigation language incorporated into the EIR to require plants to implement or help fund wildlife crossing structures or passages. As identified above, the proposed project does not include modifications to SR-118 and SR-23 (see Figure 5.17-1, *Moorpark Roadway Network*, and Implementation Actions CI-I4 and CI-I14). Policy COS-1.20 requires the City to explore the acquisition of new open space for critical habitats and wildlife corridors. At the request of the CDFW, Mitigation Measure BIO-8 has been modified to include the additional parameters requested for wildlife crossing structures/passages. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.

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A3-7 See response to Comment A3-1, the proposed project does not include the extension of the SR-23 or SR-118 (see Figure 5.17-1, *Moorpark Roadway Network*, and Implementation Actions CI-I4 and CI-I14). Development of these transportation corridors is speculative. The CDFW is requesting that the areas outlined in red on Figure 4 of their comment letter be preserved in perpetuity for wildlife movement. Policy COD-1.20 specifically identifies the desires of the city to acquire open space adjacent to and within wildlife corridors:

- **Policy COS-1.20 Open space acquisition.** Explore acquisition of new open space areas, including privately owned parcels located adjacent to or within recognized critical habitats and wildlife corridors.

A3-8 See response to Comment A3-1, the proposed project does not include the extension of the SR-23 or SR-118 (see Figure 5.17-1, *Moorpark Roadway Network*, and Implementation Actions CI-I4 and CI-I14). These potential future projects are not part of the Moorpark General Plan 2050 proposed project. If these projects move forward, additional environmental review would be required pursuant to CEQA and NEPA.

A3-9 The city acknowledges receipt of the data set review recommendations and has identified the standard databases to be queried. At the request of the CDFW, Mitigation Measure BIO-1b has been modified to include the additional datasets requested by CDFW. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.

A3-10 Section 5.4, *Biological Resources*, Impact 5.4-2 identifies potential impacts to habitat, including wetlands and riparia habitat (see pages 4.4-41 to 4.4-42) and Impact 5.4-3 identifies potential impacts to jurisdictional waters (see pages 4.4-42 to 4.4-43). See also response to Comment A3-1 regarding program- vs. project-level evaluations.

The commenter's suggestion for future projects to comply with California Fish and Game Code that requires that a Streambed Alteration Agreement (SAA) be obtained from CDFW for any activity that may do one or more of the following: "divert or obstruct the natural flow or substantially change the bed, channel, or bank 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" and compliance with the federal and State Endangered Species Act (ESA) is acknowledged in subsection 5.4.1.1, Regulatory Setting, of Section 5.4, *Biological Resources*, of the Draft EIR.

This EIR is a program-level EIR and does not evaluate the impacts of specific, individual developments that may occur under the buildout horizon of the Moorpark General Plan 2050 (see response to Comment A3-1). As discussed under Impact 5.4-3, Mitigation Measure BIO-7 would require preparation of jurisdictional delineations mapping waters, wetlands, and riparian habitats jurisdictional to the US Army Corps of Engineers (USACE), CDFW, and the Regional Water Quality Control Board (RWQCB) and

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specifying impacts to such resources. Mitigation Measure BIO-7 would also require project applicants to obtain permits and authorizations from the USACE, CDFW, and RWQCB specifying measures to avoid, minimize, and mitigate impacts. Impacts to jurisdictional riparian habitats would be less than significant. However the DEIR identifies cumulative loss of habitat and sensitive species under Impact 5.4-2 to be significant and unavoidable in the absence of a Multiple Species Habitat Conservation Plan (MSHCP) for Ventura County.

- A3-11 CDFW requests additional mitigation language incorporated into the EIR to ensure avoid impacts to streams, wetlands, and associated natural communities. The EIR includes Mitigation Measures BIO-7 to avoid and/or minimize impacts.
- A3-12 CDFW requests additional mitigation language incorporated into the EIR to comply with Fish and Game Code Section 1600 for streambed alteration permits. Projects are required to implement these existing regulations, including notification to CDFW prior to the listed activities. A Lake and Streambed Alteration Agreement (LSA) would be required; and therefore, this existing regulation is not a mitigation measure under CEQA. Furthermore, Mitigation Measure BIO-7 includes the requested information (termed SAA) and the details outlined by CDFW are assumed as part of the current application process.
- A3-13 See response to Comment A3-12. Mitigation Measure BIO-7 includes the information requested by CDFW regarding compliance with Fish and Game Code Section 1600. At the request of the CDFW, Mitigation Measure BIO-7 has been modified to include the information requested by CDFW. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A3-14 Section 5.4, *Biological Resources*, Impact 5.4-1 identifies potential impacts to sensitive species (see pages 4.4-39 to 4.4-41) and Impact 5.4-2 identifies potential impacts to habitat, including wetlands and riparia habitat (see pages 4.4-41 to 4.4-42). See also response to Comment A3-1 regarding program- vs. project-level evaluations. This EIR is a program-level EIR and does not evaluate the impacts of specific, individual developments that may occur under the buildout horizon of the Moorpark General Plan 2050. Each specific future project will conduct separate environmental review, as required by CEQA, to secure the necessary discretionary development permits. Therefore, while subsequent environmental review may be tiered off this EIR, this EIR is not intended to address impacts of individual projects. Subsequent projects will be reviewed by the city for consistency with the Moorpark General Plan 2050 and this EIR. Because the Moorpark General Plan 2050 is a program level evaluation, the specific details of future projects and the conditions at the time they are proposed are not known, it would be speculative to estimate any potential long-term or permanent changes, including those to the regulatory setting, and CEQA does not condone speculation (CEQA Guidelines Section 15145).

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As a result, it would be speculative to include a habitat assessment at the level of detail requested by CDFW for this program-level evaluation. Rather, the EIR includes generalized mapping of vegetation communities (see Figure 5.4-1, *Vegetation Communities*) and critical habitat (see Figure 5.4-2, *Critical Habitat*) and did not provide natural communities maps to the alliance or association level. A desktop review was performed for purposes of the program-level EIR and then associations/alliances were combined for purposes of comparing results and updating the current General Plan that was mapped and analyzed for sensitive natural communities based on preliminary descriptions of the terrestrial natural communities of California (Holland 1986), which is also what is named in the California Natural Diversity Database (CNDDDB) literature review. Figure 5.4-1 was mapped to association/alliance level. At the request of the Commenter, Appendix B includes vegetation mapping exhibit based on the latest available information to supplement Figure 5.4-1. However, the data from this exhibit in Appendix B is based on 2008 conditions, which is the latest available data, and does not include substantial development in the city that has occurred since 2008. As such, new discretionary projects would be required to conduct project specific biological resources assessment and map to the alliance level (using the Manual of California Vegetation [MCV] and the National Vegetation Classification Standard [NVCS]) or the currently accepted standard for veg mapping and classification as a requirement of Mitigation Measure BIO-1b. The classification standards switched from Holland to MCV in the period between the current General Plan and the Moorpark General Plan 2050, so it is not unsubstantiated to include language in case of another systematic change over the term of this EIR which goes through 2050.

While the commenter recommended that habitat identification at the alliance/association level be conducted for the Draft EIR, this level of evaluation is not appropriate for a long-range policy document such as the Moorpark General Plan 2050. Buildout development potential of the Moorpark General Plan 2050 will occur over at least the next twenty-five years, during which time habitat conditions could change substantially. Habitat and sensitive species identification and quantification conducted now as part of the Draft EIR would quickly become outdated and obsolete. In order to provide an accurate and current basis for mitigation of impacts to sensitive species, habitat identification and quantification will need to be conducted at the time of project consideration, even if a speculative analysis of the entire city had been completed in 2022. Therefore, Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, and BIO-2 require preparation of a project-level biological resources evaluation prepared by a qualified biologist in accordance with applicable federal and state laws protecting special-status species and jurisdictional wetlands and use the CNDDDB and field reconnaissance, where necessary, to confirm habitat value, to assist in identifying potential conflicts with sensitive habitats or special-status species and establishing appropriate mitigation and monitoring requirements. When future development applications are submitted to the city, the implementation of Mitigation Measures BIO-1 through BIO-9 and the Moorpark General Plan 2050 policies

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would ensure that appropriate site- and project-specific construction and operational protocols are established to protect biological resources and replacement ratios would be identified at that time by the applicable agency.

Furthermore, the Moorpark General Plan 2050 policies are required to reduce impacts to biological resources, including special-status species, nesting birds, and sensitive habitat such as streams, creeks, and wetlands, on a project-by-project basis to a less-than-significant level. These policies are based in part on the suggestions from the CDFW comment letter provided at the time of the NOP dated June 16, 2022, as well as on the recommendations of the professional biologists who were part of the Moorpark General Plan 2050 team. Specific Moorpark General Plan policies that address potential impacts to biological resources, including those identified by the commenter include:

- **Policy COS-1.16 Ecologically Significant Resource Areas.** Maintain, restore, and enhance ecologically significant resource areas in their natural state to the greatest extent possible. Limit development in these areas to compatible low-intensity uses with adequate provisions to protect sensitive resources, including setbacks around resource areas.
- **Policy COS-1.17 Native habitat protection.** Require that native vegetation and habitat are retained where feasible to support the health of local wildlife populations.
- **Policy COS-1.19: Biological resources evaluation.** Requires a biological resources evaluation prepared according to current state and federal protocols for projects with the potential to impact rare, threatened, endangered, or special-status species or critical habitat. If the evaluation determines that the project would impact rare, threatened, endangered, or special-status species or critical habitat, require that project proponents consult with the appropriate federal, state, and regional agencies and mitigate project impacts in accordance with state and federal law.
- **Policy COS-1.12: Riparian preservation.** Require that new development preserve natural watercourses and riparian habitat where they occur, either by avoidance or through ecologically-sensitive design, like clustering buildings, restoring riparian habitat, and purchasing development rights or easements.
- **Policy COS-1.16 Ecologically Significant Resource Areas.** Maintain, restore, and enhance ecologically significant resource areas in their natural state to the greatest extent possible. Limit development in these areas to compatible low-intensity uses with adequate provisions to protect sensitive resources, including setbacks around resource areas.
- **Policy COS-1.17 Native habitat protection.** Require that native vegetation and habitat are retained where feasible to support the health of local wildlife populations.

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The CDFW comment letter provided at the time of the NOP, advised the city to include mitigation measures to protect habitat and sensitive species. While each of the Moorpark General Plan 2050 polices and actions listed above require local planning and development decisions to consider impacts to biological resources, the language identified in Mitigation Measures BIO-1 through BIO-9 are specifically in alignment with the comments provided by CDFW at the time of the NOP. For example, the Mitigation Measures in the EIR require project-specific biological resource assessments that would determine what site- and project-specific mitigation measures would be required for sensitive natural communities at the time of the proposed development throughout the buildout horizon to ensure sensitive resources identified at the time of future project developments are adequately protected or appropriate project-specific compensatory mitigation is provided as part of new development to reduce impacts to a less-than-significant level, which is appropriate for a city-wide program-level EIR. Site-specific biological resources assessments and field surveys prepared by qualified biologists would follow the agency-promulgated protocols and recommended methods and standards of review including the consultation with CDFW and the United States Fish and Wildlife Service (USFWS), and rely on standard protocol sources noted by the commenter and in the Biological Resource Assessment prepared for the Moorpark General Plan 2050 included in Appendix E, Biological Resources Technical Report, of the Draft EIR.

- A3-15 CDFW requests additional mitigation language incorporated into the EIR for floristic, alliance and/or association-based mapping and vegetation impact assessment, for the project site and the fuel modification area using the CDFW's protocols. Mitigation Measure BIO-1b requires a reconnaissance-level survey using the CDFW's protocols. Mitigation Measures BIO-1b and BIO-1c have been modified in the Final EIR to specify the Protocol identified by CDFW. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A3-16 CDFW requests additional mitigation language incorporated into the EIR so that project-level studies provide a detailed map (1:24,000 or larger) showing populations of sensitive species and a table. At the request of the CDFW, Mitigation Measure BIO-1c has been revised with the requested language. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A3-17 See response to Comment A3-1 and A3-14. It would be speculative to include a habitat assessment at the level of detail requested by CDFW for this program-level evaluation. Rather, the EIR includes generalized mapping of vegetation communities (see Figure 5.4-1, *Vegetation Communities*) and critical habitat (see Figure 5.4-2, *Critical Habitat*) and did not provide natural communities maps to the alliance or association level. The methodology for the desktop literature review was adequately explained and all alliances available with their state ranking were named in Table 5.4-1 but categorized by generalized community on the Figure 5.4-1. Appendix B includes an additional exhibit based on the most recent data available (2008) for vegetation mapping at an alliance level. Recirculation of the Draft

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EIR is not required pursuant to Section 15088.5(a), *Recirculation of an EIR Prior to Certification*.

A3-18 See also response to Comment A3-1 and A3-14. Section 5.4, *Biological Resources*, Impact 5.4-2 identifies potential impacts to habitat (see pages 4.4-41 to 4.4-42) and identifies that cumulative loss of habitat in the absence of a MSHCP in Ventura County is a significant unavoidable impact (see pages 5.4-56 to 5.4-57).

See also response to Comment A3-1 and A3-14. While the commenter recommended that habitat identification and quantification of sensitive species be conducted for the Draft EIR, this level of evaluation is not appropriate for a long-range policy document such as the Moorpark General Plan 2050. Buildout development potential of the Moorpark General Plan 2050 will occur over at least the next twenty-five years, during which time habitat conditions could change substantially. Habitat identification and quantification conducted now as part of the Draft EIR would quickly become outdated and obsolete. In order to provide an accurate and current basis for mitigation of impacts to sensitive species, habitat identification and quantification will need to be conducted at the time of project consideration, even if a speculative analysis of the entire city had been completed in 2022. Therefore, Mitigation Measures BIO-1 through BIO-8 requires development project in the city to submit a Biological Resources Technical Study prepared by a qualified biologist in accordance with applicable federal and state laws protecting special-status species and jurisdictional wetlands and use the California Natural Diversity Database and field reconnaissance, where necessary, to confirm habitat value, to assist in identifying potential conflicts with sensitive habitats or special-status species and establishing appropriate mitigation and monitoring requirements. When future development applications are submitted to the city, the implementation of Moorpark General Plan 2050 Mitigation Measures, policies, and actions would ensure that appropriate site- and project-specific construction and operational protocols are established to protect biological resources.

A3-19 See response to Comment A3-18. Section 5.4, *Biological Resources*, Impact 5.4-2 identifies potential impacts to habitat (see pages 4.4-41 to 4.4-42) and identifies that cumulative loss of habitat in the absence of a MSHCP in Ventura County is a significant unavoidable impact (see pages 5.4-56 to 5.4-57).

Per CDFW's California Sensitive Natural Communities ¹, Associations currently designated as being of S3 or rarer are indicated with a Y in the Sensitive column. For alliances with State ranks of S1-S3, all associations within them are also considered Sensitive." 10 of the 18 associations/alliances (55.6%) classified as mixed scrub (1846.6 acres of 2634.3 acres total or 70.1%) in Table 5.4-1 are ranked S4: Apparently Secure –

¹ CDFW. 2022, July 5. Data Portal: California Sensitive Natural Communities.
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline>

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uncommon, but not rare, in California. 4 of the 10 mixed scrub alliances (40%) are ranked S5: Secure – common, widespread, and abundant in California and account for 214.5 acres of 2634.3 acres (8%) of the mixed scrub mapped within the City limits. One community (*Encelia californica*) accounts for 0.005% of the total mixed scrub and is unranked yet considered sensitive by CDFW as it is listed under the *Encelia californica* – *Eriogonum cinereum* alliance that has a CA rank of S3. The remaining 3 (30%) mixed scrub named associations/alliances account for 558.9 acres of the total 2634.3 acres (21.2%) are ranked S3: Vulnerable – restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation from the state. Therefore, impacts (if determined to occur at the project analysis level) to these latter 4 communities (State Rank of S3 or implied S3) that account for 21.205% of the total mixed scrub communities should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Only *Quercus agrifolia* - Coast Live Oak Woodland And Forest were identified within Moorpark and have a state rank of S4: Apparently Secure – uncommon, but not rare, in California. Any additional oak woodlands would be identified at the project analysis level.

Oak woodlands are identified as a sensitive plant community in the EIR (see discussion under Impact 5.4-1, pages 5.4-39 to 5.4-41) and the EIR identified that this sensitive community is associated with valuable habitat for wildlife, and in some cases may contribute to wildlife movement. The City considers all native oak trees sensitive under the Municipal Code Chapter 12.12 listed on Page 5.1-2 of the Draft EIR stating: "Chapter 12.12, Historic Trees, Native Oak Trees and Mature Trees, enables the city to protect and preserve mature trees, native oak trees, and historic trees (especially where such trees are associated with the proposals for urban development) because trees aid in counteracting air pollution, minimizing soil erosion, and enhancing the aesthetic environment of the city. CDFW's comment that oak woodlands are a priority for conservation and acquisition for some counties, local jurisdictions, and the Wildlife Conservation Board is noted.

- A3-20 Mitigation Measure BIO-2 identifies as Priority 1, avoidance of impacts as the preferred mitigation strategy over minimization and offsets. Thus, the requested language requested by the CDFW is included in the EIR.
- A3-21 See also response to Comment A3-1 and A3-14. Section 5.4, *Biological Resources*, Impact 5.4-2 identifies potential impacts to habitat (see pages 4.4-41 to 4.4-42) and identifies that cumulative loss of habitat in the absence of a MSHCP in Ventura County is a significant unavoidable impact (see pages 5.4-56 to 5.4-57).

Future projects will conduct separate environmental review, as required by CEQA, to secure the necessary discretionary development permits. Therefore, while subsequent environmental review may be tiered off this EIR, this EIR is not intended to address impacts of individual projects. Subsequent projects will be reviewed by the city for

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consistency with the Moorpark General Plan 2050 and this EIR and would address cumulative impacts to sensitive habitat.

Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, and BIO-2 require preparation of a project-level biological resources evaluation prepared by a qualified biologist in accordance with applicable federal and state laws protecting special-status species and jurisdictional wetlands and use the California Natural Diversity Database and field reconnaissance, where necessary, to confirm habitat value, to assist in identifying potential conflicts with wildlife movement, sensitive habitats or special-status species (including coastal California gnatcatcher, mountain lion, Crotch's bumblebee [*Bombus crotchii*], Riverside fairy shrimp [*Streptocephalus woottoni*], and Lyon's pentachaeta [*Pentachaeta lyonia*]) and establishing appropriate mitigation and monitoring requirements.

The CDFW requests that biological resources studies for subsequent projects identify acreage of sensitive habitat and open space loss, including fuel modification areas. BIO-2 has been modified at the request of CDFW to include these parameters. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR. Mitigation Measure BIO-1c requires focused surveys to include the project area plus a suitable buffer where direct or indirect project effects could potentially extend offsite.

Mitigation Measure BIO-9a through BIO-9c addresses the possible presence of bird nests in active use, which are protected under the federal MBTA and California Fish and Game Code. Mitigation Measures BIO-9a through BIO-9c requires potential new development sites where nesting birds may be present, initiate vegetation clearing and construction outside the bird nesting season or conduct preconstruction surveys by a qualified biologist in advance of any disturbance. If active nests are encountered, establish appropriate buffer zones based on recommendations by the qualified biologist and maintain the buffer zones until any young birds have successfully left the nest.

A3-22 CDFW requests additional mitigation language incorporated into BIO-2 so that the Biological Resources Report considers Ventura County's Locally Important Species List and other natural communities including but not limited to coastal sage scrub communities and oak woodland communities. Based on review of the measures in the EIR, the requested language has been added to Mitigation Measure BIO-1b. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.

A3-23 The CDFW request to protect remaining open spaces in perpetuity is noted. Policy COS-1.20 of the Moorpark General Plan 2050 supports the CDFW's request in this regard.

- **Policy COS-1.20 Open space acquisition.** Explore acquisition of new open space areas, including privately owned parcels located adjacent to or within recognized critical habitats and wildlife corridors.

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Furthermore, when future development applications are submitted to the city, the implementation of Mitigation Measures BIO-1 through BIO-9 and the Moorpark General Plan 2050 policies would mitigate project-level impacts (See also response to Comment A3-14).

- A3-24 CDFW requests additional mitigation language incorporated into the EIR so that projects that impact oak woodland prepare a Woodland Restoration Plan. Moorpark has an existing ordinance for preservation of native oak trees. Mitigation Measure BIO-2 has been revised at the request of CDFW, to reflect compliance with this city ordinance.
- A3-25 CDFW requests additional mitigation language incorporated into the EIR for projects that require fuel modification including a weed management plan, irrigations restrictions so as to not introduce invasive Argentine ants. Mitigation Measure BIO-1c requires an evaluation of biological resources impacts associated with fuel modification within and adjacent to a project site. Mitigation Measure BIO-2 has been modified at the request of CDFW to include these parameters. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A3-26 See response to Comment A3-25. CDFW requests additional mitigation language incorporated into the EIR for projects that require a weed management plan. Mitigation Measure BIO-2 has been modified at the request of CDFW to include these parameters. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A3-27 CDFW's comment on use of in-lieu fees as mitigation is noted. Mitigation Measure BIO-2 would require replacing of providing substitute resources to offset impacts (Priority Level 3, after avoiding or minimizing impacts).
- A3-28 CDFW requests removal of *Arundo* (*Arundo donax*) from Table 5.4-1 because it is listed on the California Invasive Plant Council's Invasive Plant List. At the request of CDFW this species has been removed from the Riparian vegetation community in Table 5.4-1. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A3-29 See response to Comment A3-25. CDFW requests additional mitigation language incorporated into the EIR for projects that could host pest species. Mitigation Measure BIO-2 has been modified at the request of CDFW to include these parameters. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR
- A3-30 Recommended changes to the mitigation measures included in Attachment A have been identified in response to Comments A3-1 through A3-29 above. A summary is provided below:
- *MM-BIO-1 – Wildlife Corridors Avoidance*. See response to Comment A3-1 through A3-3. The proposed project does not include extension of SR-23 or SR-118 in the Circulation Element (see Exhibit C1-1, *Moorpark Roadway Network*, and

2. Response to Comments

Implementation Actions CI-I4 and CI-I14). Mitigation Measure BIO-8 specifies measures to be taken, to minimize impacts on wildlife movement and preserve viable linkages. Additionally, new development would be reviewed under the Moorpark General Plan 2050 goals, policies, and actions, including Policy COS-1.18.

- *MM-BIO-2 – Wildlife Corridors Studies.* See response to Comment A3-4. Mitigation Measure BIO-8 has been revised to include the requested language.
- *MM-BIO-3 – Wildlife Corridors Land Acquisition.* See response to Comments A3-5 and A3-7. The policies in the General Plan are part of the project and are not considered mitigation.
- *MM-BIO-4 – Wildlife Corridor Crossings.* See response to Comment A3-6. The proposed project does not include extension of SR-23 or SR-118 in the Circulation Element (see Exhibit C1-1, *Moorpark Roadway Network*, and Implementation Actions CI-I4 and CI-I14). Mitigation Measure BIO-8 has been revised to include the requested language.
- *MM-BIO-5 – Lake or Streambed Alteration Agreement (LSA) Avoidance.* See response to Comments A3-10 through A3-13. An LSA would be required projects that trigger Section 1600; and therefore, this existing regulation is not a mitigation measure under CEQA. Furthermore, Mitigation Measure BIO-7 includes the requested information.
- *MM-BIO-6 – LSA Notification.* See response to Comments A3-10 through A3-13. A LSA would be required projects that trigger Section 1600; and therefore, this existing regulation is not a mitigation measure under CEQA. Furthermore, Mitigation Measure BIO-7 includes the requested information.
- *MM-BIO-7 – LSA Conditions.* See response to Comments A3-10 through A3-13. A LSA would be required projects that trigger Section 1600; and therefore, this existing regulation is not a mitigation measure under CEQA. Furthermore, Mitigation Measure BIO-7 includes the requested information.
- *MM-BIO-8 – Plant Mapping-Alliance/ Association Naming Program EIR.* See response to Comments A3-14 and A3-15. Mitigation Measure BIO-1b requires a reconnaissance-level survey using the CDFW's protocols. Mitigation Measure BIO-1c has been modified in the Final EIR to specify the Protocol identified by CDFW.
- *MM-BIO-9 – Plant Mapping Alliance/ Association Naming Subsequent Projects.* See response to Comments A3-14 and A3-16. Mitigation Measure BIO-1b requires a reconnaissance-level survey using the CDFW's protocols. At the request of the CDFW, Mitigation Measure BIO-1c has been revised with the requested language.

2. Response to Comments

- *MM-BIO-10 – Natural Communities Avoidance.* See response to Comments A3-18 to A3-20. Oak woodlands are identified as a sensitive plant community in the EIR (see discussion under Impact 5.4-1, pages 5.4-39 to 5.4-41). Mitigation Measure BIO-2 identifies as Priority 1, avoidance of impacts as the preferred mitigation strategy over minimization and offsets. Thus, the requested language requested by the CDFW is included in the EIR.
- *MM-BIO-11 – Cumulative Assessments – Subsequent Projects.* See response to Comment A3-21. The CDFW requests that biological resources studies for subsequent projects identify acreage of sensitive habitat and open space loss, including fuel modification areas. BIO-2 has been modified at the request of CDFW to include these parameters. Mitigation Measure BIO-1c requires focused surveys to include the project area plus a suitable buffer where direct or indirect project effects could potentially extend offsite.
- *REC-1 – Santa Monica Sierra Madre Corridor.* See response to Comment A3-1 through A3-3. The proposed project does not include extension of SR-23 or SR-118 in the Circulation Element (see Exhibit C1-1, *Moorpark Roadway Network*, and Implementation Actions CI-I4 and CI-I14). Mitigation Measure BIO-8 specifies measures to be taken, to minimize impacts on wildlife movement and preserve viable linkages. Additionally, new development would be reviewed under the Moorpark General Plan 2050 goals, policies, and actions, including Policy COS-1.18.
- *REC-2 – Wildlife Corridors SR-23 and SR-118.* See response to Comment A3-1 through A3-3. The proposed project does not include extension of SR-23 or SR-118 in the Circulation Element (see Exhibit C1-1, *Moorpark Roadway Network*, and Implementation Actions CI-I4 and CI-I14). The Moorpark Highland Specific Plan II was adopted in June 1999. Based on the City’s review of the Specific Plan buildout, the plan is fully built out. Future development within the Moorpark Highlands Specific Plan II would need to undergo additional environmental review by the city prior to development in accordance with city procedures, including review under CEQA.
- *REC-3 – Wildlife corridors Datasets.* See response to Comment A3-9. Mitigation Measure BIO-8 requires an evaluation of impacts to habitat connectivity/wildlife corridors. At the request of the commenters, these have been added as additional recommended resources in Mitigation Measure BIO-1b.
- *REC-4 – Alliant Plant Mapping Recirculation.* See response to Comment A3-1 and A3-14. It would be speculative to include a habitat assessment at the level of detail requested by CDFW for this program-level evaluation. Rather, the EIR includes generalized mapping of vegetation communities (see Figure 5.4-1, *Vegetation*

2. Response to Comments

Communities) and critical habitat (see Figure 5.4-2, *Critical Habitat*) and did not provide natural communities maps to the alliance or association level.

- *REC-5 – Locally Important Species and Habitats.* See response to Comment A3-22. CDFW requests additional mitigation language incorporated into BIO-2 so that the Biological Resources Report considers Ventura County’s Locally Important Species List and other natural communities including but not limited to coastal sage scrub communities and oak woodland communities. Based on review of the measures in the EIR, the requested language has been added to Mitigation Measure BIO-1b.
- *REC-6 – Preservation of Open Space.* See response to Comment A3-23. The CDFW request to protect remaining open spaces in perpetuity is noted. Policy COS-1.20 of the Moorpark General Plan 2050 supports the CDFW’s request in this regard.
- *REC-7 – Woodland Restoration Plan.* See response to Comment A3-24. CDFW requests additional mitigation language incorporated into the EIR so that projects that impact oak woodland prepare a Woodland Restoration Plan. Moorpark has an existing ordinance for preservation of native oak trees. Mitigation Measure BIO-2 has been revised at the request of CDFW, to reflect compliance with this city ordinance.
- *REC-8 – Fuel Modification.* See response to Comment A3-25. CDFW requests additional mitigation language incorporated into the EIR for projects that require fuel modification including a weed management plan, irrigations restrictions so as to not introduce invasive Argentine ants. Mitigation Measure BIO-1c requires an evaluation of biological resources impacts associated with fuel modification within and adjacent to a project site. Mitigation Measure BIO-2 has been modified at the request of CDFW to include these parameters.
- *REC-9 – Weed Management.* See response to Comments A3-25 and A3-26. CDFW requests additional mitigation language incorporated into the EIR for projects that require a weed management plan. Mitigation Measure BIO-2 has been modified at the request of CDFW to include these parameters.
- *REC-10 – In—Lieu Fees.* See response to Comment A3-27. CDFW’s comment on use of in-lieu fees as mitigation is noted. Mitigation Measure BIO-2 would require replacing of providing substitute resources to offset impacts (Priority Level 3, after avoiding or minimizing impacts).
- *REC-11 – Vegetation Table 5.4-1.* See response to Comment A3-28. CDFW requests removal of *Arundo* (*Arundo donax*) from Table 5.4-1 because it is listed on the California Invasive Plant Council’s Invasive Plant List. At the request of CDFW this species has been removed from the Riparian vegetation community in Table 5.4-1.

2. Response to Comments


- *REC-12 – Invasive Pests and Pathogens.* See response to Comment A3-29. CDFW requests additional mitigation language incorporated into the EIR for projects that could host pest species. Mitigation Measure BIO-2 has been modified at the request of CDFW to include these parameters.
- *REC-13 – MMRP.* The Mitigation Measures identified in Section 5.4, Biological Resources, are included in the Mitigation Monitoring and Reporting Program (MMRP) for the proposed project. The revisions requested by the CDFW, as identified above, have been incorporated into the Mitigation Measure in the EIR, and thus will be included as part of the proposed project's MMRP.

Revisions to the Draft EIR are included in Chapter 3 of this Final EIR. These revisions do not affect any conclusions or significance determinations in the Draft EIR. Therefore, no recirculation of the Draft EIR is required pursuant to Section 15088.5(a), Recirculation of an EIR Prior to Certification.

- A3-Concl. The city appreciates the input from CDFW in both of their comment letters and will rely on their expertise if and when future development is proposed throughout 2050.

2. Response to Comments

LETTER A4 – Timothy Krone, County of Ventura (2 page[s])



COUNTY of VENTURA

RESOURCE MANAGEMENT AGENCY
CHARLES R. GENKEL
Environmental Health Director

January 25, 2023

City of Moorpark
ATTN: Doug Spondello, Deputy Community Development Director
799 Moorpark Ave,
Moorpark, CA 93021

Moorpark General Plan 2050, Environmental Document Review – Draft Environmental Impact Report, (RMA REF # 22-013-1)

Ventura County Environmental Health Division (Division) staff reviewed the Draft Environmental Impact Report (DEIR). A4-Intro

The Division provides the following comment:

- The Environmental Analysis Section on Hazardous Materials identifies Ventura County Public Works and Ventura County Fire Department as coordinating agencies but does not include this Division. Consider including this Division as a coordinating agency for the following policies:

Policy SE-7.1 Hazardous materials education. Work with the Ventura County Public Works Agency to continue educating the community regarding the proper storage, handling, use, and disposal of hazardous household materials.

Policy SE-7.2 Hazardous materials business plans. Require business owners to incorporate into their business plans submitted to the Ventura County Fire Department those measures necessary to minimize hazardous materials accidents due to intense ground shaking potential and flooding. Ensure that the plans are updated as necessary

Policy SE-7.3 Hazardous waste. Coordinate with the Ventura County Public Works Agency to manage hazardous waste, including household hazardous waste. A4-1

Hazardous materials and/or hazardous wastes at or above the reportable thresholds must be reported to the Division's Certified Unified Program Agency (CUPA). Compliance with the requirement for business owners to create a hazardous material business plan is also regulated by the Division's CUPA.

Please visit our website for more information: <https://vcrma.org/en/cupa>

SHG:\Admin\TECH SERVICES\FINALED Letters\Land Use\SR0020652 ODR RMA Ref 22-013-1 Moorpark General Plan 2050 - 01 25 2023.docx

HALL OF ADMINISTRATION #1730
805-654-2813 • FAX 805-654-2480 • 800 South Victoria Avenue, Ventura, CA 93009 • vcrma.org

2. Response to Comments

If you have any questions, please contact me at (805) 654-5040 or timothy.krone@ventura.org.



Timothy Krone, R.E.H.S.
Land Use Section
Environmental Health Division

2. Response to Comments

A4. Response to Comments from Timothy Krone, Land Use Section, County of Ventura Resources Management Agency, Dated January 25, 2023.

A4-Intro The comment serves as an opening remark. The comment does not address the adequacy of the Draft EIR, and no further response is required. Responses to the County of Ventura Resources Management Agency comments on the adequacy of the Draft EIR can be found in response to Comment A4-1. The revisions to the Draft EIR in response to the comments below do not affect any conclusions or significance determinations in the Draft EIR.


A4-1 Section 5.9, *Hazards and Hazardous Materials*, has been revised on page 5.9-26 as noted in comment to include Policy SE-7.1, SE-7.2, and SE-7.3 under Relevant Goals and Policies. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.

2. Response to Comments

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2. Response to Comments

LETTER A5 – Ventura County Fire Department (9 page[s])



**VENTURA COUNTY
FIRE DEPARTMENT**

Dustin Gardner
Fire Chief
165 Durley Avenue, Camarillo, CA 93010-8586

February 6, 2023

City of Moorpark
Community Development Department
799 Moorpark Avenue
Moorpark, CA 93021

Sent via Email to Dspondello@moorparkca.gov

Subject: Comments to Moorpark General Plan 2050 and Draft EIR

The fire department has reviewed both the draft General Plan 2050 and the Program Draft EIR and have the following comments and or corrections. Several of the same comments and suggested corrections occur multiple times throughout the General Plan and DEIR documents and not every section included the same comment repeatedly. If changes are accepted, then any references to same item will need to also be changed throughout each document. This also included General Plan Goals and Policies.

We strongly recommend the DEIR preparer contact us to discuss the comments and additional information that needs to be changed and or provided.

Draft EIR:

Abbreviations and Acronyms:
Add the following:

CFC	California Fire Code
GC	California Government Code
VCFC	Ventura County Fire Code

Section 5.4 – Biological
Page 5.4-5 Regional Regulations:
Change “Ventura County Fire Protection District Ordinance 31” to read “Ventura County Fire Code”. The Ventura County Fire Department adopts the Ventura County Fire Code (VCFC), which includes provisions of the California Fire Code and International Fire Code, along with amendments, additions and deletions thereto. References to California Fire Code need to be changed to VCFC and the section numbers have changed since the adoption of the 2023 VCFC. Appendix V and W no longer exist. The reference in the first paragraph to Section 304.1.2 is incorrect for the context of the requirements listed.

Section 5.9 Hazards and Hazardous Materials
Page 5.9-14
Policy SE 7.2: Hazardous material business plans are submitted to the County Environmental Health Department who is the CUPA for the Moorpark City area, and not to VCFD.

A5-Intro

A5-1

A5-2

A5-3

2. Response to Comments

Moorpark General Plan 2050
February 6, 2023
Page 2

Page 5.9-19

Policy SE-1.11: Clarify that the policy is for "existing" areas shown in Figure 11b, and for new subdivision or developments with 10 or more units. NOTE: Make this change in all other sections of the DEIR where this policy is listed.

A5-4

Page 5.9-21

1st paragraph, 1st sentence: Add VCFC and Ventura County Fire Apparatus Access Code.
3rd sentence: Change PRC 4291 to read GC 51182. Add VCFC and Ventura County Fire Apparatus Access Code.

A5-5

Policy SE 4-4.4: The correct term is Fire Protection Plans. See VCFC Chapter 49.

A5-6

Page 5.9-26

Policy SE-4.2: As previously mentioned, the City does not adopt the CFC. VCFD adopts the CFC with amendments as the local fire authority. NOTE: Make this change in all other sections of the DEIR where this policy is listed.

A5-7

Section 5.15.1 – Fire Protection

Pages 5.15-1 & 5.15-2 Regulatory Background:

International Fire Code: Last sentence should read "... , which is an international organization of building and fire officials."

The IFC is not applicable or enforceable unless adopted by the local fire authority.

State - California Building Code: There are several inaccurate statements in this paragraph. The CBC is the minimum building standards automatically applicable to all jurisdictions within the state. Local jurisdictions do not have to adopt the CBC unless they want to add more restrictive requirements. Certain building types and uses are also reviewed by the fire department as required by state law. The typical fire safety requirements include provisions for building materials, types of construction, egress, fire resistance construction and increased provisions for buildings constructed in fire hazard severity zones and WUI areas.

A5-8

The CBC does not address clearance of debris and vegetation. That is covered in the California Fire Code (CFC). Requirements for fire protections systems (fire sprinklers) are listed in the CBC, but are copied over from the CFC, where any proposed code changes are processed.

California Fire Code: Remove 2021 from first sentence. The codes are updated and adopted on a 3 year cycle. The CFC has provisions for general fire safety, fire protection systems, hazardous materials and processes, building evacuation plans, fire drills, vegetation management and clearance.

Regional: The VCFD is not listed and has regulatory authority regarding fire safety and fire codes within the city. The VCFD also adopted two (2) ordinances applicable to the city: Ventura County Fire Code (VCFC) and the Ventura County Fire Apparatus Access Code.

2. Response to Comments

<p>Moorpark General Plan 2050 February 6, 2023 Page 3</p>	
<p>Fire Protection Facilities Fee. This fee is actually set and required under VCFD Ordinance. It is listed in the City MC and the city collects the fees for VCFD use.</p>	A5-9
<p>Table 5.15-2 – Staffing: Remove “3 personnel” from each station listing. There is a total of 3 personnel consisting of the ranks listed. Having 3 personnel, plus the ranks listed, gives the impression there are 6 persons at each station.</p>	A5-10
<p>Figure 5.15-2: Fire Station 42 symbol is obscured by the High St label.</p>	A5-11
<p>Page 5.15-10: 2nd, 3rd, and 4th paragraphs: The VCFD does not receive funding from the City general fund. The majority of VCFD funding comes from a portion of the property tax. (See VCFD response to questions in Appendix J, page J-55)</p>	A5-12
<p>Page 5.15-11 – Policy SE 7.2: Hazardous material business plans are submitted to the County Environmental Health Department who is the CUPA for the Moorpark City area, and not to VCFD.</p>	A5-13
<p>Section 5.17 – Transportation See comment below regarding SR23 and SR 118 under page 5.20-20 Evacuation and Access.</p>	A5-14
<p>Section 5.19-2 Water Supply and Distribution This section does not address water supply and distribution for required fire protection water (fire flow) for buildings, both existing and new. Fire flow consists of 3 components: available supply, duration, and flow rate (minimum 20 psir for the required duration). Fire flow is a requirement of both the CFC and the VCFC. Are there areas of the city where fire flow is substandard? Additionally, VCFC requires back-up power for all pumps and other equipment providing fire protection water. Are all water system pumping stations and booter pumps provided with back-up power?</p>	A5-15
<p>Section 5.20 – Wildfire Page 5.20-2, State Regulations: Fire Hazard Severity Zones and Responsibility Areas: Change CAL FIRE to The State Fire Marshal (SFM). The authority was transferred by State Law (AB 9 2021). Also cite Public Resources Code Sections 4201 – 4204. The SFM has the authority to adopt the FHSZ in the SRA. The SFM makes recommendations for the FHSZ in the LRA, but the local fire authority is who actually adopts the LRA FHSZ. The SFM does not designate FHSZ in the FRA.</p>	A5-16
<p>LRA: The LRA now includes the same three (3 FHSZ) as the SRA: Moderate, High, and Very High (AB63 2021). The SFM is in the process of drafting the recommended LRA FHSZ for review and adoption by the local. Fire authority. This review period is expected to start late summer 2023 after the revised SRA FHSZ are adopted (currently in public review process).</p>	A5-17
<p>Page 5.20-3, Fire Safe Regulations: Need to clarify the application of these regulations is in the SRA (all FHSZ) and only the Very High FHSZ in the LRA. In Ventura County, the VCFD is the reviewing authority as Cal Fire’s agent (Contract County), not Cal Fire.</p>	A5-18

2. Response to Comments

Moorpark General Plan 2050 February 6, 2023 Page 4	
3rd sentence: Remove "approved before 1991 where these standards were not proposed". This is inaccurate and there is also different implementation dates for SRA and LRA.	A5-19
Remove reference to Section 1273.08, Dead-End Roads and the corresponding requirements. VCFD has more restrictive access requirements and listing the fire safe regulations can confuse the reader.	A5-20
Add: Natural Hazards Disclosure Act The Natural Hazards Disclosure Act requires that sellers of residential real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more state-mapped hazard areas, including Fire Hazard Severity Zones. California law (Civil Code 1102.6f and 1102.19) requires disclosure of building construction features based upon year built, and also the seller has a current Defensible Space Inspection compliance report issued by the local fire authority. (Reference: AB 38 2019)	A5-21
Page 5.20-4 Section 1299.03. Recommend removing as it is under full revision to implement the new Zone 0 requirements and is also covered under other State and Local defensible laws and regulations. Public Resources Code Section 4291. PRC 4291 is only applicable to the SRA, not LRA which the City is located in. Remove and replace with Government Code Section 51182 which is applicable to the LRA Very High FHSZ.	
California Building Standards Code: The City of Moorpark does not adopt the California Fire Code of the Building Standards Code. The VCFD adopts the CFC with amendments.	A5-22
Building Design Standards: Last sentence: remove the word "high" before fire hazard severity zones. Reason: High is 1 of 3 separate FHSZ. The regulations mentioned apply to all 3 FHSZ in the SRA and the Very High FHSZ in the LRA.	
Materials and Methods for Exterior Wildfire Exposure: Change Public Resources Code 4291 to Government Code 51182.	
Page 5.20-5 Wildland-Urban Interface Areas: 2nd sentence: Add Government Code after Public Resources Code. Last sentence: change "landslide plans" to read "landscape plans". Add: The VCFC adopted by the VCFD further amends CFC Chapter 49 with more restrictive regulations.	A5-23
Page 5.20-7, Regional Regulations: The Ventura County Fire Department is the local fire authority within the City of Moorpark and needs to be identified here with a description of the services, programs and required review of development within the city.	A5-24
Ventura County Community Wildfire Protection Plan: The current VCCWPP is outdated and expired. It is currently under revision by the Ventura Regional Fire Safe Council. Once adopted, it will apply through the county. The goal and objectives are	A5-25

2. Response to Comments

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Page 5

developed by the stakeholders within the county, including VCFD and the City of Moorpark. They are not developed by Cal Fire. A5-25
cont'd

Page 5.20-8

Chapter 15.08, Building Code:

The term "high fire hazard zone" is an older definition adopted by the VCFD. It was revised several code cycles before and apparently was not changed in the City MC. The correct term is "Hazardous Fire Area (HFA)" and is now being defined as "Wildland-Urban Interface (WUI) within the 2023 VCFC. VCFD is also in the process of having the HFA GIS layer created and should be available summer 2023. VCFD will work with the city to have this oversight corrected. However, the 500-foot measurement has not changed. A5-26

Page 5.20-10-11

Wildfire in Moorpark:

Recommend mentioning and showing adjacent SRA FHSZ on Figure 5.20-1 as those areas have a direct impact regarding wildfire within the city LRA area.

Wildfire History:

Several large fires within and adjacent to the city are not included in the list: A5-27

1970	Clampett	115,000+
1978	Happy Camp	463
2005	Campus	20+
2007	Nightsky	??
2013	Happy Camp	44

VCFD Mapping Unit staff is putting the GIS layers into 1 file and we will send that under separate cover when available. Estimate 1-2 weeks. We have attached some PDF fire history maps.

Page 5.20-20

Evacuation and Access:

Several evacuations routes within and adjacent to the city are not shown on Figure 5.20-4 and missing from the list: A5-28

Gabbert Road
Miller Parkway
Moorpark Road, south of Tierra Rejada

Additionally, the traffic study did not address the increase traffic on State Routes 118 and 23 due to increase population/land use. These 2 routes are the main evacuation routes from the city and are also the routes for emergency responders coming from outside the city. Traffic impacts can cause delay in evacuations and emergency response. These routes are already jammed during peak hours. A5-29

Figure 5.15-4: Fire Station 42 symbol is obscured by the High St label. A5-30

Figure 15.20-5: See comment below under General Plan comments, Figure SE-2. A5-31

Page 5.20-26

Policy SE-1.11: Clarify that the policy is for "existing" areas shown in Figure 11b, and for new subdivision or developments with 10 or more units. A5-32

2. Response to Comments

<p>Moorpark General Plan 2050 February 6, 2023 Page 6</p>	
<p>2nd paragraph, 2nd sentence: Add Ventura County Fire Code and Ventura County Fire Apparatus Access Code.</p>	A5-33
<p>Page 5.20-27 6th paragraph, 1st sentence: Add Ventura County Fire Code and Ventura County Fire Apparatus Access Code.</p>	A5-34
<p>Page 5.20-28 3rd paragraph, 2nd sentence: Change PRC 4291 to GC 51182. Add Ventura County Fire Code and Ventura County Fire Apparatus Access Code.</p>	A5-35
<p>Page 5.20-30 2nd paragraph, 1st sentence: Add Ventura County Fire Code and Ventura County Fire Apparatus Access Code.</p>	A5-36
<p>2nd paragraph, 2nd sentence: Change PRC 4291 to GC 51182.</p>	A5-37
<p>2nd paragraph, 3rd sentence: The Fire Safety Regulation do not prohibit structures within 30 feet of property lines. There are required mitigation measures when less then 30 feet. Also see VCFC Section 4905.5.2.</p>	A5-38
<p>Page 5.20-34 Policy SE1-11: Clarify that the policy is for “existing” areas shown in Figure 11b, and for new subdivision or developments with 10 or more units.</p>	A5-39
<p>Page 5.20-35 Policy SE-4.2: As previously mentioned, the City does not adopt the CFC. VCFD adopts the CFC with amendments as the local fire authority.</p>	A5-40
<p>Draft General Plan 2050</p>	
<p>General comment: Land Use density increases in the Gabbert Road area. This area is located within a LRA Very High FHSZ and subject to both State Minimum Fire Safe Regulations and the Ventura County Fire Apparatus Access Code. The existing area does not have proper secondary access and no further subdivision, or increase land uses, can be allowed until proper secondary access is provided. The primary access will also require upgrade. VCFD recommends a note be added to any land use designations for this area so it is clearly identified to any person seeking to subdivide and or increase the land use, that applications may not be approved until the required access improvements are provided.</p>	A5-41
<p>Page 8-37 Section 8.5.3 Urban Fires: The City does not adopt the Fire Code. That is adopted by the VCFD.</p>	
<p>Section 8.5.4 Fire Hazard Severity Zones. See comment above to DEIR Section 5.20 Wildfire regarding the changes in FHSZ with LRA.</p>	

2. Response to Comments

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Page 7

Page 8-38

Policy SE 4.2: See comments above to DEIR regarding policy SE4.2

Policy SE 4.4: The correct term is Fire Protection Plans. See VCFC Chapter 49.

Figure SE – 10 Very High Fire Hazard Severity zones: Recommend mentioning and showing adjacent SRA FHSZ on Figure 5.20-1 as those areas have a direct impact regarding wildfire within the city LRA area.

Figure SE -2 Evacuation Constrained Residential Parcels:

How were these areas determined? It should not be limited to just residential. There are commercial and industrial parcels with potential for large numbers of persons and vehicles needing to evacuate with only single access. There are additional areas that VCFD would potential classify as evacuation constrained. Most of the Campus Park area and Moorpark College should be considered as there is a very larger population when school is in session. Most traffic would attempt to access Campus Drive and Collins Drive intersection during an evacuation, which would cause increased delays and could hinder emergency responders. Please contact VCFD to discuss Figure SE -2.

A5-41
cont'd

For any questions and or additional information regarding these comments, please contact the undersigned.

Regards,



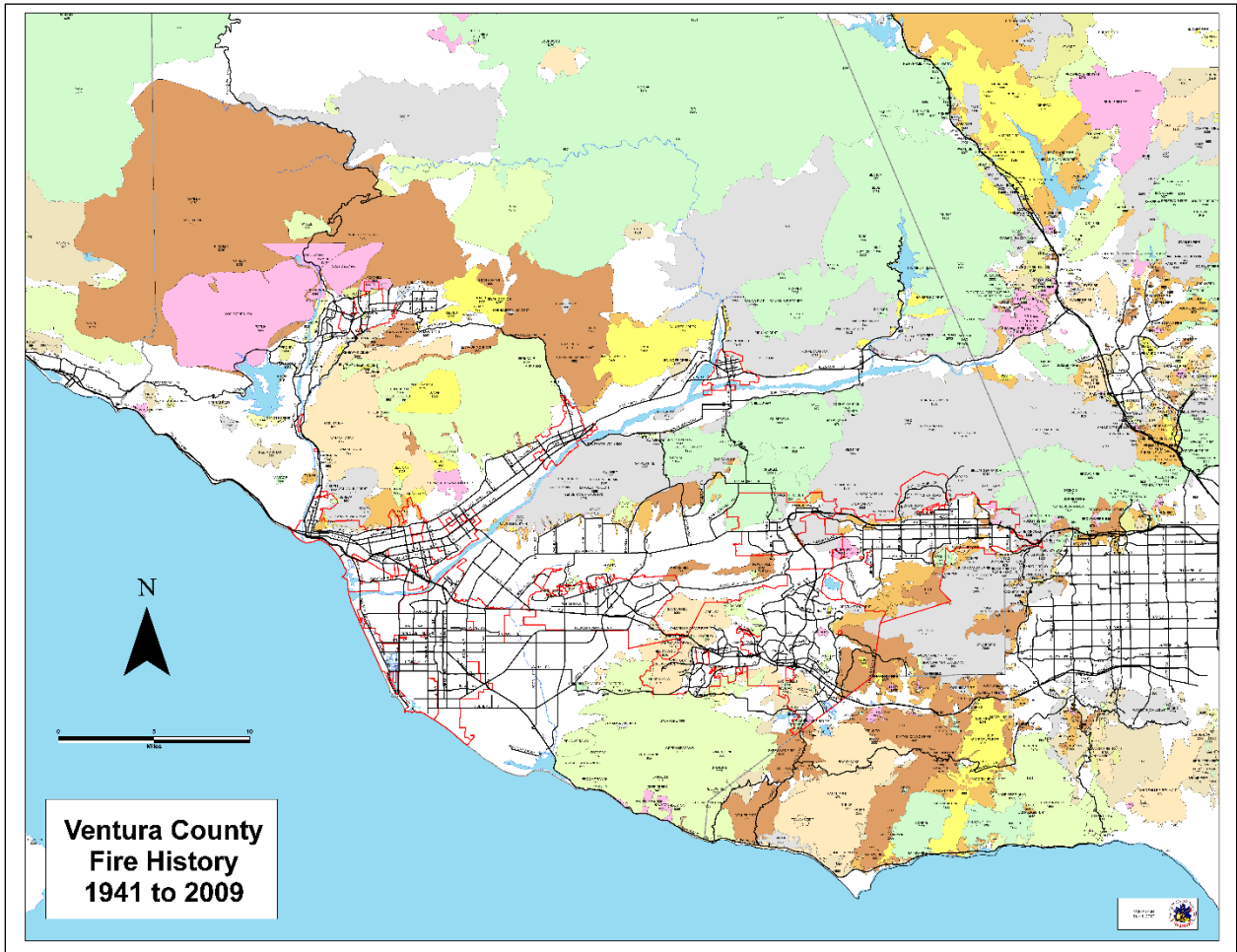
Larry G. Williams
Fire Prevention Supervisor / Manager
Community Wildfire Preparedness Unit
Fire Prevention Division

Larry.williams@ventura.org
805-947-8543

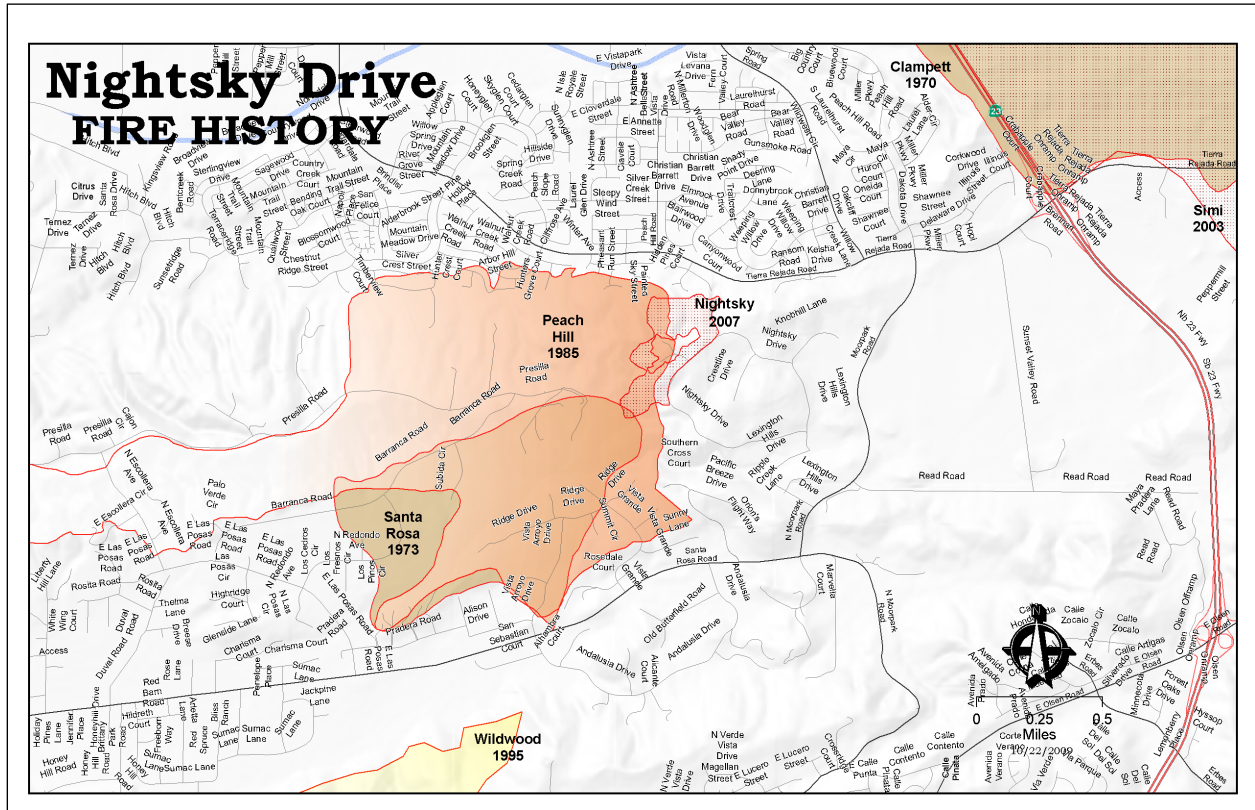
C: Calfire Land Use Unit, Attn: Joe Kennedy

Attachments:
VCFD Fire History Maps

2. Response to Comments



2. Response to Comments



2. Response to Comments

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2. Response to Comments

A5. Response to Comments from Larry G. Williams, Fire Prevention Supervisor / Manager, Ventura County Fire Department, Dated February 6, 2023.

- A5-Intro The comment serves as an opening remark. The comment does not address the adequacy of the Draft EIR, and no further response is required. Responses to the Ventura County Fire Department (VCFD) comments on the adequacy of fire and wildfire impacts in the Draft EIR can be found in response to Comments A5-1 through A5-41. The revisions to the Draft EIR in response to the comments below do not affect any conclusions or significance determinations in the Draft EIR.
- A5-1 The Abbreviations and Acronyms section in the Table of Content has been revised as noted in comment with the exception of California Government Code, as it is not referenced as GC in the EIR. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-2 Section 5.4, *Biological Resources*, has been revised on pages 5.4-5 through 5.4-6, as noted, to reflect the Ventura County Fire Code (VCFC) rather than the California Fire Code and/or International Fire Code. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-3 This comment is on the policy included in the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. At the request of the Commenter, Policy SE-7.2 has been revised to reflect the County Environmental Health department rather than the VCFD. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-4 This comment is on the policy included in the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. At the request of the Commenter, Policy SE-1.11 has been revised to reflect that this policy is for existing areas shown in Figure 11b of the Moorpark General Plan 2050. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-5 Section 5.9, *Hazards and Hazardous Materials*, has been revised on page 5.9-21, as noted in comment to reflect the VCFC. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-6 This comment is on the policy included in the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. At the request of the Commenter, Policy SE-4.2 has been revised to reflect the correct term, Fire Protection Plan. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-7 This comment is on the policy included in the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. At the request of the Commenter, Policy SE-4.2 has been revised to reflect that the VCFD adopts the California Fire Code (CFC). Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.

2. Response to Comments

- A5-8 Section 5.15, *Public Services*, has been revised on pages 5.15-1 to 5.15-2 as noted in comment to accurately reflect the existing international, state, and regional fire code requirements. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-9 Section 5.15 has been revised on pages 5.15-2 as noted in comment to reflect how the Fire Protection Facilities Fees are set up. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-10 Section 5.15, Table 5.15-2, *Existing Staffing and Equipment*, has been revised as noted in comment to reflect updated staffing of the VCFD. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-11 Figure 5.15-2, *Critical Lifeline Facilities*, has been revised as noted in comment to improve the typology in the map. Revisions to the figures in the Draft EIR are included in Appendix A of this Final EIR.
- A5-12 Section 5.15 has been revised as noted in comment to reflect where funding for fire protection service is obtained from. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-13 This comment is on the policy included in the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. At the request of the Commenter, Policy SE-7.2 has been revised to reflect the County Environmental Health department rather than the VCFD. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-14 See response to comment A5-28. Figure 5.20-4, *Evacuation Routes*, and page 5.20-20 in Section 5.20, *Wildfire*, has been revised as noted in comment to include the additional evaluation routes identified by the VCFD. Revisions to the figures in the Draft EIR are included in Appendix A of this Final EIR. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-15 Section 5.19, *Utilities and System Services*, evaluates the water supply and distribution within the City of Moorpark. Ventura County Waterworks District No. 1 routinely conducts fire flow tests at the request of Ventura County Fire Department and there haven't been any failures in quite some time. There were some lower pressure zones identified in the 2008 Water Master Plan but over time, those areas have been improved. Additionally, the District has standby generators available at each of the District's well and pump station sites to maintain operation should interruption of power occur. There are also mobile generators located at various District facilities to be deployed as needed. The District's Emergency Procedures Manual identifies various levels of emergencies and provides examples of actions for a number of given emergencies, including power failure. Section IX of the EMP lists all the stationary and mobile generators at the various District facilities with model numbers, kilowatt rating, and fuel tank capacity.

2. Response to Comments

The analysis of water supply and distribution would be evaluated on a project-by-project basis. Therefore, an analysis of water supply needed for fire protection is not included in the program-level EIR as this type of analysis would be speculative. However, Section 5.19 has been revised on page 5.19-31 to identify fire protection water in the water supply analysis. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.

- A5-16 Section 5.20 has been revised on page 5.20-2 as noted in comment to identify the State Fire Marshal (SFM) adopts the fire hazard severity zones (FHSZ) in the State Responsibility Area (SRA). Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-17 Section 5.20 has been revised on page 5.20-2 as noted in comment to reflect the Local Responsibility Areas (LRA) FHSZ. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-18 Section 5.20 has been revised on page 5.20-3 as noted in comment to clarify the application of the regulations in the FHSZ and VCFD as the reviewing authority. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-19 Section 5.20 has been revised on page 5.20-3 as noted in comment to remove the sentence identified by VCFD. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-20 Section 5.20 has been revised on page 5.20-3 as noted in comment remove the sentence identified by VCFD. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-21 Section 5.20 has been revised as noted in comment to add the Natural Hazards Disclosure Act to Section 5.20.1.1, *Regulatory Background*. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-22 Section 5.20 has been revised on page 5.20-4 as noted in comment to reflect the correct regulations and how they are implemented by the City and VCFD. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-23 Section 5.20 has been revised on page 5.20-5 as noted in comment to reference landscape plans and the additional fire requirements adopted by the VCFD. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-24 Ventura County Fire Department is identified as the local fire authority in Section 5.20.1.2, *Existing Conditions*. Additionally, as noted in Section 5.20.1.2, Section 5.15, *Public Services*, provides additional details about fire protection resources and services in Moorpark. No revisions have been made.

2. Response to Comments

- A5-25 Section 5.20 has been revised on page 5.20-7 as noted in comment to identify that the Ventura County Community Wildfire Protection Plan is in the process of being updated by the Ventura Regional Fire Safe Council. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-26 Moorpark will coordinate with the VCFD, as needed, to ensure that the City's Municipal Code includes the updated terminology and definitions for the Hazardous Fire Area (HFA) and the Wildland-Urban Interface (WUI).
- A5-27 Figure 5.20-1, *Very High Fire Hazard Severity Zones*, Figure 5.20-3, *Historic Fires Within or Near Moorpark by Acres Burned*, and pages 5.20-10 to 5.20-11 in Section 5.20 has been revised as noted in comment to reflect historic wildfires identified by the VCFD. Revisions to the figures in the Draft EIR are included in Appendix A of this Final EIR. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-28 See response to Comment A5-28. Figure 5.20-4, *Evacuation Routes*, and page 5.20-20 in Section 5.20, has been revised as noted in comment to include the additional evaluation routes identified by the VCFD. Revisions to the figures in the Draft EIR are included in Appendix A of this Final EIR.
- A5-29 The Draft EIR Section 5.17, *Transportation*, evaluates the VMT impacts of the proposed project. Under the Senate Bill 743, level of service (LOS) based transportation metrics may no longer constitute the sole basis for determining transportation impacts under CEQA. As a result, LOS for roadway capacity and intersection delay is not utilized for evaluating impacts in the EIR. However, the Moorpark General Plan 2050 Circulation Element includes roadway classifications (see also Figure 5.17-1, *Moorpark Roadway Network*), which are informed by the LOS Study included as an Appendix to the General Plan. The VCFD's comments that congestion on SR-23 and SR-118 can cause delays in evacuation and emergency response time is noted. Section 5.15, *Public Services*, evaluates the proposed project's impact on fire and police services, including emergency response time.
- A5-30 Figure 5.15-2, *Critical Lifeline Facilities*, has been revised as noted in comment to improve the typology in the map. Revisions to the figures in the Draft EIR are included in Appendix A of this Final EIR.
- A5-31 This comment is on Figure SE-2 included in the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. Figure 5.20-5 has been revised to reflect evacuation constraint comments from VCFD. Revisions to the Figure 5.20-5 in Section 5.20 of the Draft EIR are included in Appendix A of this Final EIR.
- A5-32 This comment is on the policy included in the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. At the request of the Comment, Policy SE-1.11 has been revised to reflect that this policy is for existing areas shown in Figure 11b of the Moorpark

2. Response to Comments

General Plan 2050. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.


- A5-33 Section 5.20 has been revised on page 5.20-26 as noted in comment to add the Ventura County Fire Code and Ventura County Fire Apparatus Code. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-34 Section 5.20 has been revised on page 5.20-27 as noted in comment to add the Ventura County Fire Code and Ventura County Fire Apparatus Code. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-35 Section 5.20 has been revised on page 5.20-28 as noted in comment to add the Ventura County Fire Code and Ventura County Fire Apparatus Code. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-36 Section 5.20 has been revised on page 5.20-30 as noted in comment to add the Ventura County Fire Code and Ventura County Fire Apparatus Code. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-37 Section 5.20 has been revised on page 5.20-30 as noted in comment to change the reference to the code section cited. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-38 Section 5.20 has been revised on page 5.20-30 as noted in comment to identify requirements for structures within 30 feet of a property line under VCFC Section 4905.5.2. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-39 This comment is on the policy included in the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. At the request of the Comment, Policy SE-1.11 has been revised to reflect that this policy is for existing areas shown in Figure 11b of the Moorpark General Plan 2050. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-40 This comment is on the policy included in the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. At the request of the Commenter Policy SE-4.2 has been revised to reflect that the VCFD adopts the CFC as the local fire authority. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- A5-41 This comment is on the policies included in the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. Comments on the Moorpark General Plan 2050 have been forwarded to the decisionmakers for their review and consideration. The city appreciates the input from VCFD in both of their comment letters and will rely on their expertise if and when future development is proposed throughout 2050.

2. Response to Comments

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2. Response to Comments


LETTER A6 – Ventura County Air Pollution Control District (3 page[s])

	Ventura County Air Pollution Control District	4567 Telephone Rd Ventura, California 93003	tel 805/303-4005 fax 805/456-7797 www.vcapcd.org	Ali Reza Ghasemi, PE Air Pollution Control Officer
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**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**
Memorandum

TO: Doug Spondello, Deputy Community Development Director

DATE: February 6, 2023

FROM: Nicole Collazo, Air Quality Specialist, VCAPCD Planning Division 

SUBJECT: Draft Programmatic Environmental Impact Report for the City of Moorpark 2050 General Plan Update (RMA 22-013-1)

A6-Intro

Ventura County Air Pollution Control District (APCD) staff has reviewed the draft (NOP) for the draft program environmental impact report (PEIR) of the 2050 General Plan Update (GPU), which will set forth the City of Moorpark’s (City) vision of its developmental future and express the goals, policies, and implementation programs as it pertains to land use, health and safety, housing, and resource conservation. All General Plan elements will be updated to reflect current conditions, requirements of Government Code Section 65302, and community preferences. The Project location encompasses the City of Moorpark city limits. The Lead Agency for the project is the City of Moorpark.

General Comments

APCD submits the following comments regarding the City’s PEIR to its GPU.

Item 1, Mitigation Measure Impact 5.3-2 (Executive Summary MMRP and in Air Quality Impact). In addition to the measures listed in MM Impact 5.3-2 for construction, APCD recommends adding several more emission reduction measures we routinely recommend for environmental reviews and contained in our APCD Rule 55, Fugitive Dust. These are 1) adding a 15 MPH speed limit sign to construction site, 2) using reclaimed water if available for second subpoint to the first point listed, 3) street sweeping when necessary (presence of track-out) using a PM-10 certified street sweeper or in conformance with SCAQMD Rule 1186, and 4) placing rumble strips on points of truck or construction vehicle exits. It is also suggested to include the language “including, but not limited to” before listing the measures.

A6-1

Item 2, Mitigation Measure 5.3-3 (Executive Summary MMRP and in Air Quality Impact). In order for mitigation proposed to be more enforceable and have value in reducing air emissions, APCD recommends changing the language in the second bullet point to add in the end “and provide justification for not incorporating into the design plan” and the seventh bullet point from “provide facilities the support electric charging stations per the...” to “provide electric charging stations per the...”

A6-2

2. Response to Comments

Item 3, Page 5.3-12, First and Second paragraphs. The statement that the SCCAB is managed by the VCAPCD is incomplete. The SCCAB is managed by VCAPCD, Santa Barbara County APCD, and San Luis Obispo County APCD.

A6-3

Item 4, Pages 5.3-12 and 5.3-30. We'd like to note the 2022 Air Quality Management Plan (AQMP) was adopted on December 13, 2022.

A6-4

Item 5, Page 5.3-30, Impacts of the Environment on a Project. APCD would like to comment on this section regarding not analyzing an existing environmental impact on a future or proposed project. The 2015 court case *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (Case No. S213478) was mentioned. However, the court decision (found [here](#)) states that there are exemptions to this ruling, such as housing projects [CA H&S Code Section 21159.21 environmental review, including of General Plans, for housing projects (affordable housing, housing etc. near existing significant health hazards)] and the ruling itself does not preclude a Lead Agency from reviewing or requiring the applicant to disclose what those existing impacts are to a proposed project, such as a residential project being cited within 500 feet of a freeway, gas station, rail yard, etc. The following passages are contained in the Supreme Court Ruling (underlined by APCD for emphasis). In addition, the PEIR contains a section on sensitive receptors and the California Air Resources Board's guidance on not citing sensitive land uses near places of high toxic exposure such as high travelled roadways and gas stations but did not conclude the section with the City's actions towards this guidance (PEIR, Page 5.3-17-5.3-18) and instead adds a section on how this citing will not be prevented or considered, just mentioned.

"Nor, for that matter, does CEQA prohibit an agency from considering — as part of an environmental review for a project it proposes to undertake — how existing conditions might impact a project's future users or residents. Indeed, it appears that such an analysis had been widely understood to be an integral aspect of CEQA review for three decades. (OPR, CEQA: The California Environmental Quality Act: Law and Guidelines 1984 (Jan. 1984) Discussion of amendments, Guidelines former § 15126, p. 137 [dismissing as early as 1983 the alleged —artificial distinction| between examining —the effects of the project on the environment| and —the effects of the environment on the project|].)...

A6-5

...D. Exceptions to the General Rule.

Although CEQA does not generally require an evaluation of the effects of existing hazards on future users of the proposed project, it calls for such an analysis in several specific contexts involving certain airport (§ 21096) and school construction projects (§ 21151.8), and some housing development projects (§§ 21159.21, subds. (f), (h), 21159.22, subds. (a), (b)(3), 21159.23, subd. (a)(2)(A), 21159.24, subd. (a)(1), (3), 21155.1, subd. (a)(4), (6). Section 21096 requires a lead agency to use certain technical resources when addressing airport-related safety hazards and noise problems in EIRs for projects near airports (§ 21096, subd. (a)), and prohibits a lead agency from adopting a negative declaration without considering —whether the project will result in a safety hazard or noise problem for persons using the airport or for persons residing or working in the project area.| (§ 21096, subd. (b).) Section 21151.8 mandates certain methods to determine if school sites are located on or near sources of hazardous substances or waste or in close proximity

2. Response to Comments

to freeways or other operations that might emit hazardous emissions. (§ 21151.8, subd. (a), (a)(2)(A) [detailing health and safety risks and hazardous conditions and setting forth the process for consulting with air quality districts and other agencies].)”

Thank you for the opportunity to comment on the project. If you have any questions, you may contact me at nicole@vcapcd.org.

A6-5
cont'd

2. Response to Comments

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2. Response to Comments

A6. Response to Comments from Nicole Collazo, Air Quality Specialist, Planning Division, Ventura County Air Pollution Control District, Dated February 6, 2023.

A6-Intro The comment serves as an opening remark. See Appendix A, *Notice of Preparation and Comment Letters*, of the Draft EIR, for a copy of the Ventura County Air Pollution Control District’s (VCAPCD) Notice of Preparation (NOP) comment letter. The comment does not address the adequacy of the Draft EIR, and no further response is required. Responses to comments on the adequacy of the air quality evaluation in the Draft EIR can be found in response to Comment A6-1 through A6-5.

A6-1 VCAPCD requests additional mitigation language incorporated into the EIR for fugitive dust control during construction. Mitigation Measure AQ-1 includes the recommended language request by VCAPCD for project-level studies. At the request of the VCAPCD, Mitigation Measure AQ-1 has been revised to include the additional requested language. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.

A6-2 VCAPCD requests additional mitigation language incorporated into the EIR for Impact 5.3-3, under Mitigation Measure AQ-2. Mitigation At the request of the VCAPCD, Mitigation Measure AQ-1 has been revised to include the additional requested language. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.

A6-3 At the request of the VCAPCD, the language on page 5.3-12 in Section 5.3, *Air Quality*, has been revised to include the additional requested language. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.

A6-4 At the request of the VCAPCD, the language on pages 5.3-12 and 5.3-31 in Section 5.3, *Air Quality*, has been revised to include the additional requested language. Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.

A6-5 Impacts of the environment on a project are not CEQA impacts (*California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369, Case No. S213478*). The exceptions to the exemptions do not include program-level general plans. Projects that fall under the exceptions to the exemption under this case would be limited to those projects identified in the Public Resources Code (PRC) (i.e., certain airport [PRC Section 21096], some school construction projects [PRC Section 21151.8], and some housing development projects [PRC Sections 21159.21 – housing project exemption, 21159.22 – agricultural employee housing exemption, 21159.23 – low income housing exemption, 21159.24, 0 infill housing exemption, and 21155.1 – housing sustainability district]).

Additionally, Section 5.3, *Air Quality*, under the section entitled, “Impact of the Environment on a Project” on page 5.3-31, includes a discussion of how the Moorpark General Plan addresses air quality compatibility in its land use decisions. The Moorpark

2. Response to Comments

General Plan 2050 includes the following Land Use Element policies to minimize land use compatibility conflicts when siting new sensitive land uses:

- **Policy LU-5.5 Compatible land uses.** Require design features that provide visual relief and separation between land uses of conflicting character.
- **Policy LU-7.1 Mitigate environmental impacts.** Locate and design new development to minimize adverse visual and/or environmental impacts to the community.
- **Policy LU-7.3 Protect uses from hazards.** Require that new development be located and designed to avoid or mitigate any potentially hazardous conditions.

Lastly, the California Building Code (Title 24), Part 6 (California Building and Energy Efficiency Standards) as well as Part 11 (California Green Building Standards Code [CALGreen]) has standards for enhanced filtration for multi-family residential buildings. Under Title 24, Part 6, Section 120.1(b)(1)(C) and Part 11 (Section 5.504.5.3), multifamily residential buildings that are four stories or higher are required to use Minimum Efficiency Reporting Value (MERV)-13 filters.

The city appreciates the input from VCAPCD in both of their comment letters and will rely on their expertise if and when future development is proposed throughout 2050.

2. Response to Comments

LETTER I1 – Dr. Mark Di Cecco (2 page[s])

General Plan draft

From: Mark Di Cecco <mark@diceccoarch.com>
Sent: Friday, February 03, 2023 3:28 PM
To: Douglas Spondello <DSpondello@MoorparkCA.gov>
Cc: Carlene Saxton <CSaxton@MoorparkCA.gov>; Jonathan Nettler <jnettlr@placeworks.com>
Subject: DEIR/GP comments

Thanks very much,

mark

Dr. Mark Di Cecco AIA
NCARB, LEED AP



I1-Intro

2. Response to Comments

General Plan draft	
DEIR comments	
Table ES-1	I1-1
<ul style="list-style-type: none"> Add existing General Plan numbers. Shouldn't "existing conditions" be the current General Plan, not currently as-built? 	
Table ES-2	
<ul style="list-style-type: none"> 5.2-1 Unique farmland loss? See comment below for figure 5.2-1 	I1-2
<ul style="list-style-type: none"> 5.2-2 wetlands/riparian loss? no map to back it up 	I1-3
<ul style="list-style-type: none"> 5.5-1 historic structures is defined as any structures over 45 years? 	I1-4
<ul style="list-style-type: none"> 5.9-5 the "no project alternative" would have the same impacts 	I1-5
<ul style="list-style-type: none"> 5.20-2 says 2030 should be 2050. the "no project alternative" would have the same impacts 	I1-6
Table 3-5	
<ul style="list-style-type: none"> Add existing General Plan numbers. Shouldn't "existing conditions" be the current General Plan, not currently as-built? 	I1-7
<ul style="list-style-type: none"> Figure 4.1: what does the lime green color signify? (its not on the legend) 	I1-8
<ul style="list-style-type: none"> Figure 4.3: should we eliminate the Census Tract boundary, or add the Census Tract boundary that includes the vulnerable communities outside of CT6111007611? 	I1-9
<ul style="list-style-type: none"> Figure 5.1-1 what does "SR23/Desoto Ave. near Browns Canyon" mean? 	I1-10
<ul style="list-style-type: none"> Figure 5.2-1: Much of the "farmland of local importance" is open space (designated as such per the individual projects they are located within), hillsides, riparian areas or drainage. Not "farmable" by definition. Similar comment for some of the grazing land. Cross reference with Figure 5.4-1. Doesn't mesh with General Plan Figure OS-2 or C-1, C-2B. 	I1-11
General Plan	
<ul style="list-style-type: none"> Figure SE-6 index doesn't match the figures in the plan (see SE-9 for reference) 	I1-12

2. Response to Comments

I1. Response to Comments from Dr. Mark Di Cecco, dated February 3, 2023.

- I1-Intro The comment serves as an opening remark. The comment does not address the adequacy of the Draft EIR, and no further response is required.
- I1-1 As described in Section 4.1, *Introduction*, pursuant to provisions of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines, a “description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, from both a local and a regional perspective.”
- I1-2 Section 5.2, *Agriculture and Forestry Resources*, Impact 5.2-1 identifies potential impacts to unique farmland loss (see pages 5.2-11 through 5.2-13). See response to comment I1-11 for comment on Figure 5.2-1, *Important Farmland*.
- I1-3 Section 5.4, *Biological Resources*, Impact 5.4-2 identifies potential impacts to wetland and riparian habitats (see pages 5.4-41 and 5.4-42). Additionally, see Figures 5.4-5, *Potential Aquatic Features (NWI)*, and 5.4-6, *Potential Aquatic Features (NHD)* for potential aquatic features that may include definable bed, bank, or channel; areas of rivers, streams, and lakes that support periodic or intermittent flows, perennial flows, or subsurface flows; areas that support fish or other aquatic life; and areas that support riparian or hydrophytic vegetation in association with a streambed.
- I1-4 As described in Section 5.5, *Cultural Resources*, historic resources are buildings, structures, objects, sites, and districts of significance in history, archaeology, architecture, and culture. These resources include intact structures of any type that are at least 50 years old. Mitigation Measure CUL-1 uses 45 years as a conservative estimate to determine if there is a historical resource.
- I1-5 Section 7.4, *No Project/Current General Plan Alternative*, of Chapter 7, *Alternatives*, details the impacts for each Appendix G topic (see pages 7-8 through 7-13).
- I1-6 Section 5.20, *Wildfire*, Impact 5.20-2 is revised to as noted by the commenter to reflect 2050 instead of 2030. See Section 7.4, *No Project/Current General Plan Alternative*, of Chapter 7, *Alternatives*, for the No Project Alternatives impacts to Wildfire (see page 7-12). Revisions to the Draft EIR are included in Chapter 3 of this Final EIR.
- I1-7 See response to comment I1-1.
- I1-8 Figure 4.1, *Neighborhoods and Districts*, has been revised to include the lime green in legend. Revisions to the figures in the Draft EIR are included in Appendix A of this Final EIR.
- I1-9 Chapter 4, *Environmental Setting*, under subheading, *Moorpark CalEnviroScreen Assessment*, identifies that Moorpark does not have any census tracts that would fall within three of the four definitions of a disadvantaged community. Though Moorpark does not have a disadvantaged community, it is noted that the older downtown has the greatest

2. Response to Comments

concentration of large households and minority and low-income residents and Figure 4-3, *Vulnerable Communities*, includes the census tract bounded on the south by Los Angeles Avenue and by Poindexter to the north (see page 4-14).

- I1-10 Figure 5.1-1, *Scenic Corridors*, has been revised to remove the mislabeled identified text. Revisions to the figures in the Draft EIR are included in Appendix A of this Final EIR.
- I1-11 As described in Section 5.2.1.1, *Regulatory Background*, of Section 5.2, *Agricultural and Forestry Resources*, the Department of Conservation manages the Farmland Mapping and Monitoring Program which classifies land into various classifications, including Farmland of Local Importance. As noted in Table 5.2-3, *Farmland in Moorpark at Buildout*, footnote 1, agricultural uses are assumed to continue on lands designated Agriculture (AG), Open Space (OS), and Floodway (FLDWY). Additionally, as discussed on page 5.2-3, not all the agricultural resources shown in Table 5.2-2 are currently in agricultural production.
- I1-12 This comment is on Figure SE-6 included in the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. Comments on the Moorpark General Plan 2050 have been forwarded to the decisionmakers for their review and consideration. Any changes to the Moorpark General Plan will be reflected in the Final Moorpark General Plan 2050.

2. Response to Comments

LETTER I2 – John W. Newton (5 page[s])

<p>John W. Newton & Associates, Inc. <i>Professional Consultants</i> 159 Moonsong Court Post Office Box 471 Moorpark, California 93021</p>	<p>Broker Lic. 00925471</p>	
<p>Telephone (805) 529-3494 newtoncnstl@msn.com</p>		
<p>February 6, 2023</p>		
<p>Doug Spondello Deputy Director Community Development Department 799 Moorpark Avenue Moorpark, CA 93021</p>	<p>Received FEB - 6 2023 City of Moorpark</p>	
<p>Re: 2050 Draft Environmental Impact Report DEIR, General Plan Update</p>		
<p>Dear Mr. Spondello:</p>		
<p>Please consider the below comments to specific, sequential sections of the above-referenced DEIR:</p>		
<p>1.4.1: The Circulation Element does not satisfy local and subregional mobility needs, nor does it provide adequate access and connectivity between various neighborhoods and districts, AS SUBSEQUENT COMMENTS WILL DEMONSTRATE.</p>	I2-1	
<p>1.4.1.1-7: The objective of providing for the safe and efficient movement of people..., goods and services into, out of, and through the City of Moorpark HAS NOT BEEN MET, AS SUBSEQUENT COMMENTS WILL DEMONSTRATE.</p>	I2-2	
<p>1.6: There are additional Mitigation Measures and Alternatives that, in a revised Circulation Element, would substantially lessen some of the significant impacts of the proposed project and achieve more of the basic project objectives.</p>	I2-3	
<p>2.3.1: Transportation should not be considered Less than Significant unless the Circulation Element is revised AS SUBSEQUENTLY PROPOSED.</p>	I2-4	
<p>3.4-7: Same comment as in Section 1.4.1.1-7.</p>	I2-5	
<p>3.5.1.1: Same comment as in Section 1.4.1.1-7.</p>	I2-6	
<p>LAND USE CONSULTING Engineering • Planning • Permits Subdivision • Zoning</p>	<p>MINERAL RESOURCE DEVELOPMENT Engineering • Planning • Permits Reclamation • SMARA Reports</p>	<p>REAL ESTATE BROKERAGE Commercial • Industrial • Land Residential • Property Management</p>

2. Response to Comments

Doug Spondello
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Page 2

5.11.3.1: Note that Policy CI-1.2 of the Circulation Element requires the City to design, plan, maintain, and operate streets using complete street principles...and encourages street connectivity that aims to create a comprehensive, integrated, connected network.... THE PROPOSED CIRCULATION ELEMENT DOES NOT.

12-7

Table 5.11-1, GOAL #3, 4 & 7: Policies CI-1.7, CI-1.8, CI-1.1 through CI-1.9 ARE NOT IMPLEMENTABLE DUE TO INADEQUACY OF THE PROPOSED CIRCULATION ELEMENT.

12-8

5.11.4: Same comments as in Table 5.11-1, Goal #3, 4 & 7.

12-9

5.17.3.2: The SR23 N/S extension from the 23/118 Freeway Interchange to SR23 Broadway Road AS DEPICTED ON THE EXISTING GENERAL PLAN CIRCULATION ELEMENT HIGHWAY NETWORK MAP (attached), IS MISSING FROM THE IMPACT ANALYSIS SECTION.

12-10

Also, the complete North Hills Parkway facility from the West City Limit (with Westerly future connection to SR118) to the SR 23/118 Freeway Interchange at Princeton Avenue, AS DEPICTED ON THE EXISTING GENERAL PLAN CIRCULATION ELEMENT HIGHWAY NETWORK MAP (attached), IS MISSING FROM THE IMPACT ANALYSIS SECTION. Note that the North Hills Parkway has replaced the SR118 re-route alignment by City Council actions since adoption of the existing Circulation Element in 1992.

12-11

5.17.3.2-RTP ID 5A0742: This North Hills Parkway project needs to show a future SR118 connection to SR118 West of the City Limits, and a connection to the SR23/118 Freeway Interchange at Princeton Avenue AS DEPICTED ON THE EXISTING GENERAL PLAN CIRCULATION ELEMENT. HIGHWAY NETWORK MAP (attached), AS THE PREVIOUSLY DESIGNATED SR118 RE-ROUTE.

12-12

SUMMARY: The DEIR Circulation Element Roadway Classification Map (attached) is inadequate in that it fails to provide for the SR23 N/S connection between SR23 Broadway and the SR23/118 Freeway Interchange, and the E/W connection to the North Hills Parkway (formerly the SR118 re-route) from the West City Limit to the SR23/118 Freeway Interchange at Princeton Avenue. The Westerly extension also needs to provide for a future connection to SR118 West of the UPRR just West of the City.

12-13

2. Response to Comments

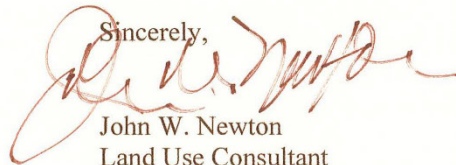
Doug Spondello
February 6, 2023
Page 3

As a result, transportation connectivity, into and out of, and through the City is not being achieved. Neighborhoods are not easily connected for safe and ease of travel, and alternatives to the heavily travelled commercial and through traffic state highways are not available to local residents. The opportunity to remove commercial truck and through traffic from Downtown and this high density residential area on the SR23 highway is a long term, critical objective of the City. Rights of way have been and continue to be acquired by the City specifically for completion of these important arterials. Opportunities for state and federal funding, in the case of the SR23 N/S facility can only be sought and realized if the future connections are mapped as they currently are on the existing General Plan Circulation Map; the proposed 2050 General Plan Circulation Plan Map needs to be revised. If this can reasonably be accomplished then the DEIR Objectives, Policies, Goals and Impact Analyses need to be revised accordingly.

I2-13
cont'd

Thank you for your consideration.

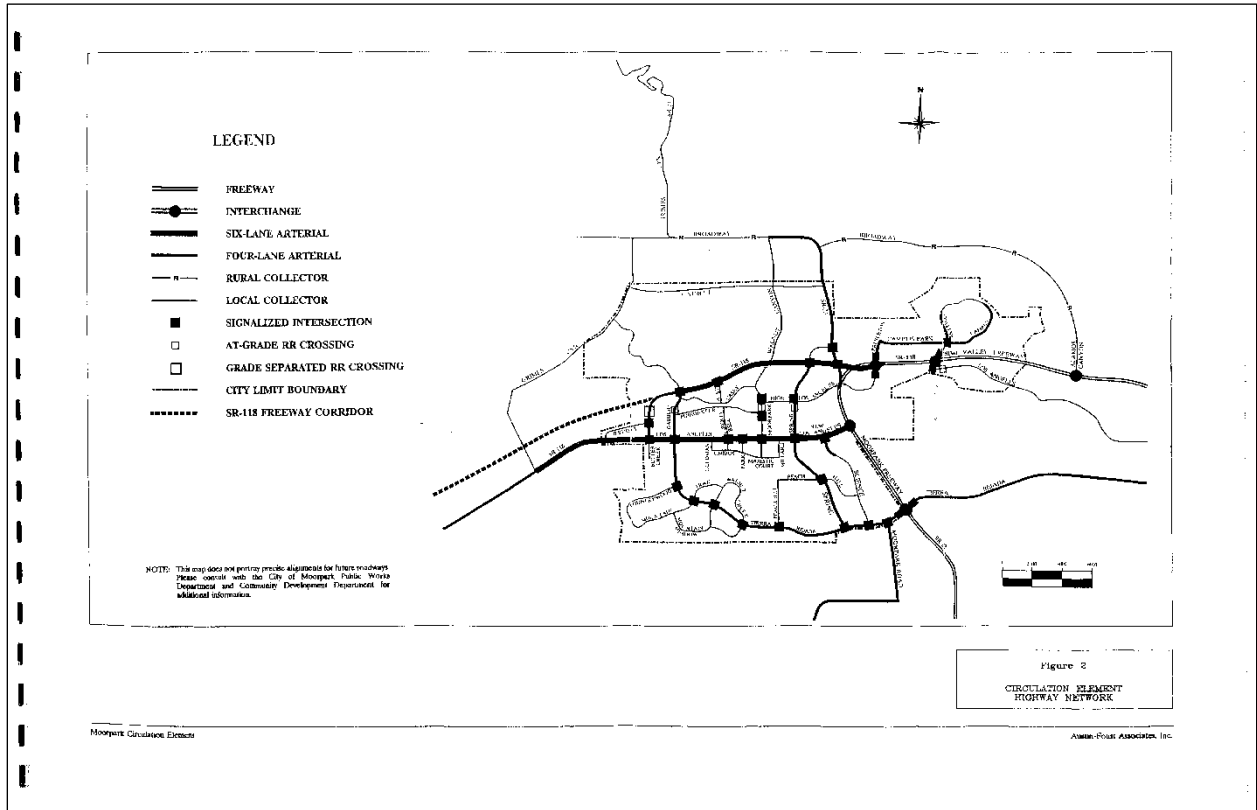
Sincerely,



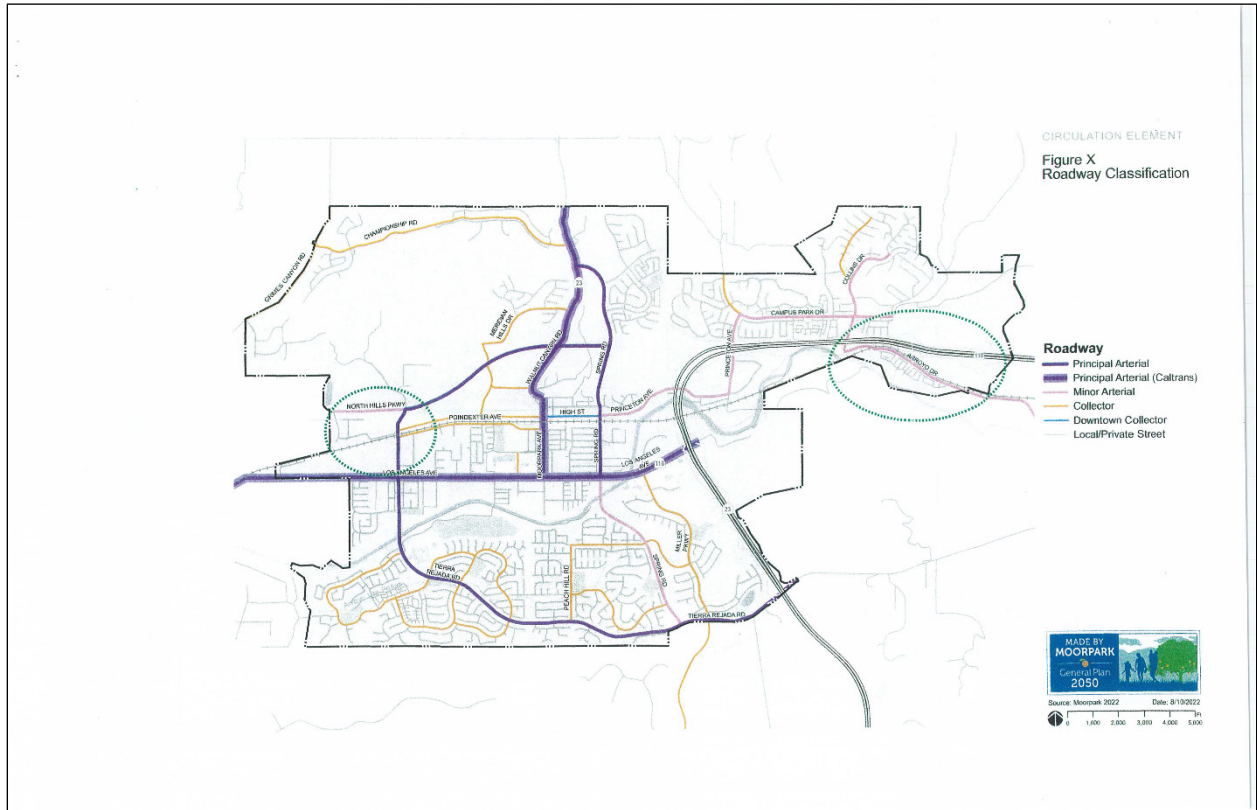
John W. Newton
Land Use Consultant

Attachments

2. Response to Comments



2. Response to Comments



2. Response to Comments

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2. Response to Comments

I2. Response to Comments from John W. Newton, dated February 6, 2023.

- I2-Intro The comment serves as an opening remark. The comment does not address the adequacy of the Draft EIR, and no further response is required. Responses to comments on the adequacy of the transportation and traffic in the Draft EIR can be found in response to Comment A2-1 through A2-12.
- I2-1 This comment is on the adequacy of the Circulation Element of the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. Comments on the Moorpark General Plan 2050 have been forwarded to the decisionmakers for their review and consideration.
- I2-2 This comment is on the adequacy of the Circulation Element of the Moorpark General Plan 2050 meeting the project objectives and not the adequacy of the Draft EIR. The Circulation Element includes new roadways and roadway extensions, as well as planned enhancements to the bicycle network. These potential enhancements to the circulation network, as well as corresponding implementation programs related to policies in the Circulation Element, are intended to meet the goal of providing safe and efficient movement of people. Comments on the Moorpark General Plan 2050 have been forwarded to the decisionmakers for their review and consideration.
- I2-3 The commenter requests additional mitigation language and alternatives incorporated into the EIR that would lessen some significant impacts of the proposed project. However, the commenter does not identify any proposed mitigation language or alternatives (see CEQA Guidelines Section 15088, responses to general comments may be general). The Draft EIR included all feasible mitigation measures for an impact found to be potentially significant. The Draft EIR also determined project alternatives based on their ability to reduce potentially significant impacts of the proposed project and their potential to attain most of the project's basic objectives.
- I2-4 The Moorpark General Plan 2050 impact on Transportation is considered less than significant based on the City's CEQA guidelines, which utilize Vehicle Miles Traveled (VMT) as the analysis metric. This determination was reached using the Ventura County Transportation Model (VCTM), which is a regional travel-demand model. Comments on the Moorpark General Plan 2050 have been forwarded to the decisionmakers for their review and consideration.
- I2-5 See response Comment I2-2. This comment is on the adequacy of the Circulation Element of the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. Comments on the Moorpark General Plan 2050 have been forwarded to the decisionmakers for their review and consideration.
- I2-6 See response Comment I2-2. This comment is on the adequacy of the Circulation Element of the Moorpark General Plan 2050 and not the adequacy of the Draft EIR.

2. Response to Comments

Comments on the Moorpark General Plan 2050 have been forwarded to the decisionmakers for their review and consideration.

- I2-7 The commenter states that Policy CI-1.2 of the Circulation Element is not consistent with the current General Plan Circulation Element. This comment is on the adequacy of the Circulation Element of the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. The Circulation Element includes the new North Hills Parkway facility, as well as extensions to Meridian Hills Drive, Casey Road, High Street, and Gabbert Road. In addition, the bicycle network is planned for modifications which include new Class I, II, and III facilities. These potential enhancements to the circulation network are intended to result in a more comprehensive, balanced, connected network. Comments on the Moorpark General Plan 2050 have been forwarded to the decisionmakers for their review and consideration.
- I2-8 This comment is on the Goals and Policies of the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. Comments on the Moorpark General Plan 2050 have been forwarded to the decisionmakers for their review and consideration.
- I2-9 See response Comment I2-8. This comment is on Goals 3, 4, and 7 of the Moorpark General Plan 2050 and not the adequacy of the Draft EIR. Comments on the Moorpark General Plan 2050 have been forwarded to the decisionmakers for their review and consideration.
- I2-10 The Moorpark General Plan 2050 Circulation Element does not include the extension of State Route (SR)-23 or SR-118 North Hills Parkway bypass (see Figure 5.17-1, *Moorpark Roadway Network*). See also Implementation Actions CI-I4 and CI-I14:
- **CI-I4 Agency Coordination.** Provide Staff-Level Coordination with Ventura County, Ventura County Transportation Commission, California Highway Patrol and Caltrans to achieve consistency between regional and local transportation improvements and the General Plan and accomplish the city's future transportation goals. Coordinate with SCAG to update the SCS/RTP to reflect the North Hills Parkway project as an arterial roadway without the direct connection to the SR-118 Freeway.
 - **CI-I14 Study SR-23 Bypass or Alternative Use.** Evaluate whether a bypass of SR-23 from the vicinity of the future North Hills Parkway east of Spring Road north to Broadway Road should be pursued by the city or whether an alternative use or uses would be appropriate for lands previously dedicated to that use.
- I2-11 See response to Comment I2-10, the proposed project does not include the extension of the SR-23 or SR-118 (see Figure 5.17-1, *Moorpark Roadway Network*, and Implementation Actions CI-I4 and CI-I14).

2. Response to Comments

- I2-12 See response to Comment I2-10, the proposed project does not include the extension of the SR-23 or SR-118 (see Figure 5.17-1, *Moorpark Roadway Network*, and Implementation Actions CI-I4 and CI-I14). Development of these transportation corridors is speculative.
- I2-13 The comment serves as a summary of the previous comments. The comment does not address the adequacy of the Draft EIR, and no further response is required. Responses to comments on the adequacy of the transportation and traffic in the Draft EIR can be found in response to Comment A2-1 through A2-12.

2. Response to Comments

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2. Response to Comments

LETTER I3 – Dr. Roseann Mikos (2 page[s])

From: [Douglas Spondello](#)
To: [Emma Haines](#); [Nicole Vermilion](#); [Jonathan Nettler](#)
Subject: FW: Partial Comments of DEIR for the Moorpark General Plan 2050 Draft Update
Date: Monday, February 6, 2023 4:00:38 PM
Attachments: [image001.png](#)

Comments below

Doug Spondello, AICP
Deputy Community Development Director
Community Development Department
City of Moorpark | 799 Moorpark Ave. | Moorpark, CA 93021
(805) 517-6251 | dspondello@moorparkca.gov
moorparkca.gov
discovermoorpark.com



I3-Intro

From: Roseann Mikos <r.mikos@sbcglobal.net>
Sent: Monday, February 06, 2023 3:59 PM
To: Douglas Spondello <DSpondello@MoorparkCA.gov>
Subject: Partial Comments of DEIR for the Moorpark General Plan 2050 Draft Update

To: City of Moorpark

From: Dr. Roseann Mikos

Date: February 6, 2023

RE: Partial Comments of DEIR for the Moorpark General Plan 2050 Draft Update

The following comments are offered regarding the above referenced DEIR and I reserve the right to provide additional comments in the future.

With respect to the Impact 5.4-4 regarding the impact to adversely impact wildlife movement in the Santa Monica-Sierra Madre Connect Corridor, I would submit that the background and supporting documentation is weak and incomplete as figure 5.4-4 CLEARLY shows the named corridor on the map wrapping around NOT just the Moorpark Highlands Specific Plan (as was discussed) but also the Carlsberg Specific Plan (covering almost half of the Serenata Development), not much discussed. This is next to the Tierra Rejada Critical Wildlife Passage Area (CWPA)--YET there is little of no meaningful discussion about this and how important it is to the wildlife corridor connection to the Santa Monica Mountains through the Tierra Rejada Valley,

I3-1

2. Response to Comments

& through the Ensign Bickford property to Tierra Rejada and on to Thousand Oaks.

I believe this has been discussed incompletely and needs to be more fleshed out to explain how much MORE important this is through Moorpark than appears in the document.

I do not have enough time to try to explain more, other than to say that I think the wildlife corridor information needs to be further explained and re-evaluated so as not to minimize the importance and significance that it has.

I will try to provide additional information in the future.

Sincerely,

Roseann Mikos, Ph.D.

Roseann Mikos, Ph.D.
Moorpark, CA 93021
805-878-3300 (M)
805-529-4828 (H)

I3-1
cont'd

2. Response to Comments

I3. Response to Comments from Dr. Roseann Mikos, dated February 6, 2023.

I3-Intro The comment serves as an opening remark. The comment does not address the adequacy of the Draft EIR, and no further response is required. Responses to comments on the adequacy of biological resources and wildlife movement in the Draft EIR can be found in response to Comment I3-2.

I3-2 Section 5.4, *Biological Resources*, Impact 5.4-4 identifies potential impacts associated with wildlife movement. The Draft EIR (and technical Appendix E) included a map of the Regional Wildlife Corridors in the city, including the Santa Monica – Sierra Madre Connection and the Tierra Rejada Critical Wildlife Passage Area (CWPA). Figure 5.4-4, *Regional Wildlife Corridor*, is accurate and based on the latest information available from the County and California Department of Fish and Wildlife (CDFW). As identified on page 5.4-28 through 5.4-32, under “Wildlife Movement Corridors and Linkages” wildlife movement through the Santa Monica-Sierra Madre connection is restricted by the existing Moorpark College and residential developments. The western branch is also fragmented by existing industrial development and residential development, including the Highland Specific Plan.

The EIR includes mitigation measures, such as Mitigation Measure BIO-8 for habitat connectivity/wildlife corridor protection to avoid critical linkages, provide buffers, follow shielding lighting requirements, and other features that would need to be integrated into the design of projects in the city to minimize and avoid impacts. Mitigation Measure BIO-8 specifies measures to be taken, to minimize impacts on wildlife movement and preserve viable linkages in place to ensure less than significant impacts.

Additionally, new development would be reviewed under the Moorpark General Plan 2050 goals, policies, and actions, which include goals and policies to minimize impacts associated with noise, light, and vibration, including:

- **Policy COS-1.18 Wildlife corridors.** Adopt land use regulations that consider, complement and support state, regional, and county-adopted wildlife corridors, including the Ventura County Wildlife Corridor Overlay Zone and evaluate the appropriateness of designating additional corridors.
- **Policy COS-1.20 Open space acquisition.** Explore acquisition of new open space areas, including privately owned parcels located adjacent to or within recognized critical habitats and wildlife corridors.

2. Response to Comments

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3. Revisions to the Draft EIR

3.1 INTRODUCTION

This section contains revisions to the Draft EIR based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of Draft EIR publication; and/or (3) typographical errors. This section also includes additional mitigation measures to fully respond to commenter concerns as well as provide additional clarification to mitigation requirements included in the Draft EIR.

None of the revisions to the Draft EIR require recirculation of the document. Recirculation is only required when significant new information is added. Information is not significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect or a feasible way to mitigate or avoid such an effect. Recirculation is not required where the new information merely clarifies, amplifies, or makes insignificant modifications. (CEQA Guidelines Section 15088.5.) As explained below, none of the changes adds any new significant information and recirculation is not required.

Changes made to the Draft EIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

3.2 DEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the Draft EIR.

Page xiv, Abbreviations and Acronyms has been revised in response to Comments from the VCFD (see Comment Letter A5) to include CFC.

CFC California Fire Code

Page xvii, Abbreviations and Acronyms has been revised in response to Comments from the VCFD (see Comment Letter A5) to include VCFC.

VCFC Ventura County Fire Code VCFC

3. Revisions to the Draft EIR

Page 5.3-12, Section 5.3, *Air Quality*, has been revised in response to Comments from the VCAPCD (see Comment Letter A6) to reflect the management of the South Central Coast Air Basin (SCCAB).

Regional

The State is divided into air districts called air pollution control districts or air quality management districts. These agencies are county or regional governing authorities that have primary responsibility for controlling air pollution from stationary sources. CARB and local air districts are also responsible for developing clean air plans to demonstrate how and when California will attain AAQS established under both the federal and California Clean Air Acts. For the areas in California that have not attained air quality standards, CARB works with air districts to develop and implement state and local attainment plans. In general, attainment plans contain a discussion of ambient air quality data and trends; a baseline emissions inventory; future year projections of emissions that account for growth projections and already adopted control measures; a comprehensive control strategy of additional measures needed to reach attainment; an attainment demonstration, which generally involves complex modeling; and contingency measures. Plans may also include interim milestones for progress toward attainment. The SCCAB is managed by the Ventura County APCD, Santa Barbara Air Pollution Control District, and the San Luis Obispo County Air Pollution Control District.

Page 5.3-12, Section 5.3, *Air Quality*, has been revised in response to Comments from the VCAPCD (see Comment Letter A6) to reflect the recent adoption of the Air Quality Management Plan.

2022 AQMP

Ventura County APCD ~~plans to update~~ adopted the ~~2016~~ 2022 Ventura County Air Quality Management Plan (AQMP) on December 13, 2022, ~~which would present Ventura County's strategy~~ to attain the 2015 federal 8-hour ozone standard of 70 parts per billion (ppb) as required by the federal CAA Amendments of 1990 and applicable EPA clean air regulations. This is the only federal clean air standard Ventura County would not meet by the compliance deadline of August 3, 2027. Photochemical air quality modeling indicates that Ventura County will attain the 2015 federal 8-hour ozone standard by 2026 using local, state, and federal clean air programs. Additionally, the EPA determined that Ventura County had attained the 2008 federal 8-hour ozone standard by the 2016 AQMP's attainment date. Overall, the ~~draft~~ 2022 AQMP ~~will~~ provides an update emissions inventory, local and state air pollutant control measures, new emission forecasts and projections, a new federal conformity budget for transportation projects, and demonstration that Ventura County will attain the federal 8-hour ozone standard (Ventura County APCD 2022).

Page 5.3-31, Section 5.3, *Air Quality*, has been revised in response to Comments from the VCAPCD (see Comment Letter A6) to reflect the recent adoption of the Air Quality Management Plan.

The Ventura County APCD is directly responsible for reducing emissions from area, stationary, and mobile sources in the SCCAB to achieve the National and California AAQS and has responded to this requirement by preparing an AQMP. The Ventura County APCD Governing Board adopted ~~the 2016 Ventura County AQMP~~

3. Revisions to the Draft EIR

~~and plans to adopt~~ the ~~proposed~~ 2022 Ventura County AQMP ~~in~~ on December 13, 2022 as a regional and multiagency effort (South Coast AQMD, CARB, SCAG, and EPA).

Mitigation Measure AQ-1, Section 5.3, *Air Quality*, has been revised in response to Comments from the VCAPCD (see Comment Letter A6).

AQ-1

Construction Phase Air Quality Technical Analysis. Prior to discretionary approval by the City of Moorpark for development projects subject to review under the California Environmental Quality Act (CEQA) (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City of Moorpark Community Development Department for review and approval. The evaluation shall be prepared in conformance with Ventura County Air Pollution Control District (APCD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the Ventura County APCD-adopted thresholds of significance, the City of Moorpark shall require feasible mitigation measures to reduce air quality emissions. Potential measures shall be incorporated as conditions of approval for a project and may include, but are not limited to:

- Require fugitive dust control measures that exceed Ventura County APCD's Regulation IV, Rule 55, Fugitive Dust, such as:
 - Requiring use of nontoxic soil stabilizers to reduce wind erosion.
 - Applying water every four hours to active soil disturbing activities, using reclaimed water, if available.
 - Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
 - Adding a 15 MPH speed limit sign to construction site.
 - Street sweeping when necessary (presence of track-out) using a PM-10 certified street sweeper or in conformance with South Coast Air Quality Management District Rule 1186.
 - Placing rumble strips on points of truck or construction vehicle exits.
- Use construction equipment rated by the United States Environmental Protection Agency as having exhaust emission limits of Tier 4 interim or higher.
- Ensure construction equipment is properly serviced and maintained to the manufacturers' standards.
- Limit nonessential idling of construction equipment to no more than five consecutive minutes.
- Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible.

3. Revisions to the Draft EIR

These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Community Development Department.

Mitigation Measure AQ-2, Section 5.3, *Air Quality*, has been revised in response to Comments from the VCAPCD (see Comment Letter A6).

AQ 2

Long-Term Air Quality Technical Analysis. Prior to discretionary approval by the City of Moorpark for development projects subject to review under the California Environmental Quality Act (CEQA) (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation-related air quality impacts to the City of Moorpark Community Development Department for review and approval. The evaluation shall be prepared in conformance with Ventura County Air Pollution Control District (APCD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the Ventura County APCD-adopted thresholds of significance, the City of Moorpark shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as conditions of approval. Possible mitigation measures to reduce long-term emissions could include but are not limited to:

- For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks to plug in the anticipated number of refrigerated trailers and reduce idling time and emissions.
- Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use or provide justification for not incorporating into the design plan.
- Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 sec. 2485).
- Provide changing/shower facilities as specified in the Nonresidential Voluntary Measures of CALGreen.
- Provide bicycle parking facilities per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen.
- Provide preferential parking spaces for low-emitting, fuel-efficient, and carpool/van vehicles per the Nonresidential Voluntary Measures of CALGreen.

3. Revisions to the Draft EIR

- Provide ~~facilities to support~~ electric charging stations per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen.
- Applicant-provided appliances shall be Energy Star-certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star-certified or equivalent appliances shall be verified by the City during plan check.

Page 5.4-5, Section 5.4, *Biological Resources*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to reflect the latest applicable Fire Codes.

Ventura County Fire Code Protection District Ordinance Number 31

The Ventura County Fire Department is responsible for the protection of lives and property in the county. Its area of jurisdiction includes all unincorporated areas of Ventura County as well as the cities of Camarillo, Moorpark, Ojai, Port Hueneme, Simi Valley, Thousand Oaks, and Santa Paula. Per Ventura County Fire Code (VCFC) California Fire Code Section 304.1.2 (Vegetation) clearance requirements in wildland-urban interface fire areas, hazardous fire areas and any other parcels declared a public nuisance by the fire code official shall be in accordance with the VCFC Chapter 49, Appendix W of the California Fire Code. ~~In addition, properties within said areas would be subject to guidelines provided in Appendix V (Fire Safety Provisions for Hazardous Fire Areas):~~

Page 5.4-7, Section 5.4, *Biological Resources*, has been revised in response to Comments from the CDFW (see Comment Letter A3).

Vegetation Communities and Other Land Cover Types

A review of the County's GIS database of vegetation cover was conducted to determine general vegetation communities that occur within the city limits. The county layer combines numerous vegetation/land cover maps that have been created for parts of Ventura County, at different scales, using different classification schemes to create one GIS vegetation/land cover database and map. The county mapping layer uses the currently accepted vegetation classification system (the National Vegetation Classification Standard [NVCS]). ~~Vegetation communities mapped within the city limits were overlaid on recent aerial imagery, boundaries were adjusted or changed to a different cover type, and communities were generalized.~~ A field verification survey of vegetation communities and land cover types was not conducted.

3. Revisions to the Draft EIR

Table 5.4-1, *Vegetation Communities and Other Land Cover Types Mapped in Moorpark*, Section 5.4, *Biological Resources*, has been revised in response to Comments from the CDFW and to reflect the correct mapped acreages in Figure 5.4-1 (see Comment Letter A3).

Table 5.4-1 Vegetation Communities and Other Land Cover Types Mapped in Moorpark

Vegetation Community/Land Cover		CA Rank	Amount (acres)
Scientific Name	Common Name		
Agriculture			281.7
			86.0
–	Agriculture		
Alluvial Scrub			14.9
<i>Lepidospartum squamatum</i>	Scale broom scrub	S3	
–	Streambed		
Channel			6.4
–	Developed	–	
–	Urban/Disturbed or Built-Up		
Chaparral			12.0
<i>Adenostoma fasciculatum</i>	Chamise chaparral	S5	
<i>Adenostoma fasciculatum</i> – <i>Salvia mellifera</i>	Chamise – black sage chaparral	S4	
Developed			4436.6
			4,450.1
–	Developed	–	
–	Postfire or postclearing regeneration unidentifiable shrubs	–	
–	Urban/disturbed or built-up	–	
Disturbed			345.4
			606.0
–	Cleared land	–	
–	Native and nonnative herbaceous Mapping Unit	–	
–	Urban – herbaceous/cleared	–	
Eucalyptus Woodland			1.5
<i>Eucalyptus spp.</i>	Eucalyptus groves	–	
Mixed Scrub			4894.9
			1,812.2
<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	

3. Revisions to the Draft EIR

Table 5.4-1 Vegetation Communities and Other Land Cover Types Mapped in Moorpark

Vegetation Community/Land Cover		CA Rank	Amount (acres)
Scientific Name	Common Name		
<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	
Native Bunchgrass Grassland			167.2
<i>Nassella pulchra</i>	Purple needlegrass grassland	-	
Oak Woodland			138.6
<i>Quercus agrifolia</i>	Coast live oak woodland and forest	S4	
<i>Quercus agrifolia</i> alliance	Coast live oak woodland and forest	S4	
Open Water			7.0
-	Water	-	
Nonnative Wetland			11.4
<i>Arundo donax</i>	Giant reed marsh	=	
Ornamental			168.7
-	Exotic trees undifferentiated	-	
<i>Schinus molle</i>	Peppertree groves	-	
Landscaped			279.2 280.7
-	Predominantly shrubs/herbaceous on artificial cuts/embankments	-	
-	Urban – shrub	-	
Riparian			237.1 228.7
<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	-	

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Table 5.4-1 Vegetation Communities and Other Land Cover Types Mapped in Moorpark

Vegetation Community/Land Cover		CA Rank	Amount (acres)
Scientific Name	Common Name		
Source: ECORP 2022.			
State Rank Designations:			
S1: Critically Imperiled – extreme rarity (often 5 or fewer populations) or because of factors, such as very steep declines, making it especially vulnerable to extirpation from California.			
S2: Imperiled – rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it vulnerable to extirpation California.			
S3: Vulnerable – restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation from the state.			
S4: Apparently Secure – uncommon, but not rare, in California			
S5: Secure – common, widespread, and abundant in California			

Page 5.4-10, Section 5.4, *Biological Resources*, has been revised in response to Comments from the CDFW to reflect that the nonnative giant reed (*Arundo donax*) is not a native riparian species (see Comment Letter A3).

- **Riparian.** Areas mapped as Riparian occur throughout Moorpark and are associated with creeks, streambeds, earthen-bottom channels, and certain other depressional features that are subjected to urban runoff. Riparian includes a variety of vegetation communities that include woodland, scrub, and thickets; ~~and emergent freshwater marsh~~. Representative riparian species included in this vegetation category include mulefat (*Baccharis salicifolia*), western sycamore (*Platanus racemosa*), and arroyo willow (*Salix lasiolepis*), ~~and nonnative giant reed (*Arundo donax*)~~.
- **Nonnative Wetland.** This group includes wetland communities that are dominated by nonnative species. Nonnative giant reed (*Arundo donax*) is mapped in several locations in the eastern portion of Moorpark, south of SR-118 and east of SR-23.

Mitigation Measure BIO-1b, Section 5.4, *Biological Resources*, has been revised in response to Comments from the CDFW (see Comment Letter A3).

- BIO-1b **Biological Reconnaissance-Level Survey.** The biological reconnaissance-level survey shall include, but not be limited to:
- An analysis of available literature and biological databases including but not limited to: California Department of Fish and Wildlife (CDFW); California Natural Diversity Database (CNDDDB); California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, National Wetland Inventory Database (NWI); USGS National Hydrographic Dataset (NHD); EcoAtlas; and database searches of the US Fish and Wildlife Service Critical Habitat, Environmental Conservation Online System (ECOS), and Information, Planning, and Conservation System (IPaC). Additionally, a review of Missing Linkages in California’s landscape California Natural Diversity Database (CNDDDB) layer (ds420), South Coast Missing Linkages (ds419), and Essential Connectivity Areas (ds620) is recommended and South Coast Missing Linkages projected

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“least cost” linkage designs for the South Coast Ecoregion (South Coast Wildlands 2008 & Penrod 2006), CDFW’s Priority Wildlife Movement Barrier locations report (CDFW 2020a), and National Park Service’s (NPS) collar data relating to mountain lion should be considered. The literature review shall be performed prior to the field survey to identify sensitive biological resources that were reported previously from the proposed development project vicinity and to help determine the type of sensitive biological resources that may be in the survey area.

- A review of current land use and land ownership within the proposed development project vicinity.
- A field assessment survey that includes mapping vegetation communities in the proposed development project (including but not limited to project footprint, proposed access roads, staging and laydown areas, fuel management zones, and a suitable buffer) following systematic field techniques outlined by CDFW’s Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. The Manual of California Vegetation (MCV) should also be used to inform this mapping as CDFW only tracks rare natural communities using this classification system utilizing the Manual of California Vegetation, 2nd edition (MCV) and the National Vegetation Classification System (NVCS) or the currently accepted standard for vegetation mapping and classification. An evaluation of each mapped vegetation community’s State and Global rarity ranks shall be determined using CDFW’s Vegetation Classification and Mapping Program (VegCAMP). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. An evaluation of the project’s potential to support special status plant and wildlife species. The environmental document shall provide measures to fully mitigate the loss of habitat.
- An evaluation of the proposed development project’s potential to support special status plant and wildlife species. Biological Resources Report shall consider impacts to species identified on Ventura County’s Locally Important Species List and impacts to other natural communities including but not limited to coastal sage scrub communities and oak woodland communities.
- An evaluation of nesting habitat for migratory and special status bird species.
- An evaluation of potential impacts to bats and roosts from ground-disturbing activities.
- A general assessment of potential jurisdictional areas, including wetlands and riparian habitats.
- An evaluation of potential local and regional wildlife movement corridors.

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Mitigation Measure BIO-1c, Section 5.4, *Biological Resources*, has been revised in response to Comments from the CDFW (see Comment Letter A3).

BIO-1c **Focused Species Surveys.** If one or more special status plant or animal species has the potential to occur within the proposed development project area (including but not limited to project footprint, proposed access roads, staging and laydown areas, and a suitable buffer), a qualified biologist shall conduct additional focused surveys for said species using the most recently updated protocols recommended by natural resource agencies or, if not available, standards accepted in the professional biological community to survey that taxonomic group, community, or species. CDFW currently recommends that 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. The Manual of California Vegetation (MCV) shall also be used to inform this mapping. If an established protocol is not available for a special status species, the qualified biologist will consult with the City and CDFW or USFWS to determine the appropriate survey protocol. The focused species survey(s) will be at a level to determine the presence/absence of these species and to adequately evaluate potential direct and/or indirect impacts to these species. Adjoining properties shall also be surveyed (as access permits) where direct or indirect project effects, such as those from fuel modification or herbicide application, could potentially extend off-site. To the extent possible, the focused species surveys should be conducted during nondrought years at the time of year when species are both evident and identifiable. The focused survey shall record the location and boundary of special status species by use of global positioning system (GPS). The number of individuals shall be counted (if population is small) or estimated (if population is large). If applicable, information about the percentage of individuals in each life stage should be provided (seedlings, reproductive individuals, adults, nestlings, juveniles, transients or migrant individuals, etc.). If feasible, images of the target species and representative habitats should be included to support information and descriptions. Results of focused species surveys shall be summarized in the proposed development project's Biological Resources Technical Report. The Report shall include a detailed map (1:24,000 or larger) showing which plants or populations will be impacted. The Report shall also include a table that documents the number of sensitive plants and acres of supporting habitat impacts, and plant 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). Identified rare plants shall also be plotted within the map.

Mitigation Measure BIO-2, Section 5.4, *Biological Resources*, has been revised in response to Comments from the CDFW (see Comment Letter A3).

BIO-2 **Special-Status Species, Sensitive Habitats, Wetlands, Other Non-wetland Waters, Native Wildlife Nursery Sites, and Wildlife Corridors.** If a sensitive biological resource is identified during field surveys (see BIO-1b and BIO-1c), the City shall require implementation

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of mitigation measures at the project level that fully account for the adversely affected resource. To the maximum extent feasible, mitigation measures should adhere to the following order of priority to reduce adverse impacts of a proposed project to the resource: avoid impacts, minimize impacts, and compensate for impacts. Mitigation measures shall be used on a project-level basis and be tailored to on-site conditions and sensitive biological resources present.

- **Priority 1, Avoidance of Impacts.** Proposed development shall avoid impacts to the maximum extent feasible by not taking certain actions or parts of an action. Projects shall be sited to avoid direct or indirect impacts on the resource and include measures such as implementing no-disturbance buffers (e.g., nesting bird buffer areas during construction, siting staging areas outside buffer area) or implementing project-specific design features (e.g., wildlife-friendly fencing and lighting in a wildlife corridor), such that indirect adverse effects of project development are avoided. This shall include flagging all plants and/or perimeter of populations; stop-work buffers around plants and/or populations (e.g., flagged perimeter plus 50 feet); restrictions on ground-disturbing activities within protected areas; relocation of staging and other material piling areas away from protected areas; restrictions on herbicide use and/or type of herbicide and/or application method within 100 feet of sensitive plants; and worker education and training. This shall especially apply to the Santa Monica-Sierra Madre wildlife corridor and the Tierra Rejada Vernal Pool Preserve in the Carlsberg Specific Plan area and designated critical habitat for Lyon's pentachaeta and Riverside fairy shrimp (*Streptocephalus woottoni*) in the southeast corner of Moorpark. Projects should avoid sensitive natural communities, including locally important communities such as oak woodlands and alliances with a State Rank of S1-S3 that fall under the mixed scrub characterization, to the maximum extent practicable.

- **Priority 2, Minimize Impacts.** Proposed development shall be conditioned to minimize adverse impacts by limiting the degree or magnitude of the action and its implementation to less than significant to the maximum extent feasible. Other mitigation measures may include reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

Measures to mitigate the spread of invasive plant species and invasive wildlife species (e.g., New Zealand mudsnail) shall include but will not be limited to: cleaning of equipment, footwear, and clothing before entering a construction site and the identification and treatment of significant infestations of invasive plant species within a project site.

- **Priority 3, Offset Impacts.** Offsetting impacts can be done by replacing or providing substitute resources or by rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

Offset mitigation ratios for protected sensitive resources will be established based on the rarity of the resource, quality of affected habitat associated with the resource, temporary and permanent losses to habitat function, the type of mitigation proposed (restoration,

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enhancement, preservation, establishment), and other requirements associated with state or federal permits. Mitigation ratios will be determined at the project level in consultation with the city, the qualified biologist, and, where applicable, federal or state agencies with jurisdiction over the resource (e.g., CDFW, USACE, USFWS).

If impacts on a protected sensitive biological resource are unavoidable, then the project proponent shall mitigate for the type of resource as follows:

- **Endangered, Rare, Threatened, or Candidate Species.** The applicant shall obtain incidental take authorization from USFWS (16 US Code Section 1531 et seq.) or CDFW (California Fish and Game Code Sections 2050–2115.5) prior to commencing development of the project site; apply minimization measures or other conditions required under the incidental take authorization; and provide equivalent compensation for the unavoidable losses of these resources, generally at a minimum ratio of 1:1. Compensation may include purchasing credits from a USFWS- or CDFW-approved mitigation bank or restoring or enhancing habitat within the project site or outside of the project site.
- **Special Status Species (not listed).** The applicant shall provide equivalent compensation for impacts on special status species by restoring or significantly enhancing existing habitat where the species occurs or by acquiring or protecting land that provides habitat function for affected species and is at least equivalent to the habitat function removed or degraded as a result of project implementation.

If impacts on sensitive habitats, wetlands, other nonwetland waters, riparian habitats, native wildlife nursery sites, and wildlife corridors cannot be avoided, the project applicant shall:

- **Federal- or State-Protected Sensitive Habitats.** Obtain the required regulatory authorization (e.g., Section 404 permits for impacts on waters of the United States, 401 water quality certification from the Regional Water Quality Control Board, a Streambed Alteration Agreement for impacts on aquatic or riparian habitats within CDFW jurisdiction under Fish and Game Code Section 1600), and provide equivalent compensation for the unavoidable losses of the above-mentioned resources such that there is no net loss.
- **Other Protected Sensitive Habitats (includes sensitive natural communities, habitat connectivity and wildlife corridors, native wildlife nursery or overwintering sites).** Provide compensation for other protected sensitive habitats, which may include the restoration, enhancement, or preservation of the aforementioned habitats within or outside of the project site, or the purchasing of credits at an existing mitigation bank or in-lieu fee program deemed acceptable by the Moorpark Community Development Director.

All compensatory mitigation sites shall be protected in perpetuity through a conservation easement (if off-site), or deed restriction (or other comparable legal instrument) if on-site.

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If impacts to oak woodland or the understory vegetation cannot be avoided, the project applicant shall comply existing Historic Trees, Native Trees, and Mature Trees Ordinance.

For projects that remove vegetation that could host pest species, the applicant shall 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, polyphagous shot hole borer, and goldspotted oak borer. If invasive pests and/or diseases are detected, the applicant, in coordination with the project arborist, shall provide an infectious tree disease management plan. 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.

Mitigation Measure BIO-7, Section 5.4, *Biological Resources*, has been revised in response to Comments from the CDFW (see Comment Letter A3).

BIO-7 Aquatic Resources Delineation and Regulatory Permitting. The City of Moorpark shall require applicants of development projects that have the potential to affect jurisdictional resources to contract with a qualified biologist to conduct a jurisdictional delineation to map the extent of wetlands and nonwetland waters; determine jurisdiction; consider changes in upstream and downstream drainage patterns, runoff, and sedimentation; and assess potential impacts (including an evaluation of potential changes in upstream and downstream drainage patterns, runoff, and sedimentation). The delineation shall be conducted pursuant to the U.S. Fish and Wildlife Service wetland definition adopted by the California Department of Fish and Wildlife. The results of the delineation shall be presented in a wetland delineation report and shall be incorporated into the CEQA document(s) required for approval and permitting of the proposed development project.

Projects shall prioritize avoidance of impacts to streams, wetlands and associated natural communities. Applicants of development projects that have the potential to impact jurisdictional features, as identified in the wetland delineation letter report, shall obtain permits and authorizations from the US Army Corps of Engineers for a Section 404 Clean Water Act (CWA) Permit, to the California Department of Fish and Wildlife (CDFW) for a Section 1600 Lake or Streambed Alteration Agreement (SAA), and/or to the Regional Water Quality Control Board (RWQCB) for a Section 401 Water Quality Certification. The regulatory agency authorization(s) shall include impact avoidance and minimization measures as well as mitigation measures for unavoidable impacts. Specific avoidance, minimization, and mitigation measures for impacts to jurisdictional resources shall be determined through discussions with the regulatory agencies during the proposed development project permitting process and may include avoidance of resources, on-site or off-site creation, enhancement or restoration, and/or protection and management of mitigation lands in perpetuity ~~monetary contributions to a mitigation bank or habitat creation, restoration, or enhancement.~~

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Page 5.4-54, Section 5.4, *Biological Resources*, has been revised to reflect that Mitigation Measures BIO-1(a-d) and BIO-2 also are applicable to Impact 5.4-4.

Impact 5.4-4

Mitigation Measures BIO-1(a-d) and BIO-2 are also applicable to Impact 5.4-4.

Mitigation Measure BIO-8, Section 5.4, *Biological Resources*, has been revised in response to Comments from the CDFW (see Comment Letter A3).

BIO-8 **Habitat Connectivity/Wildlife Corridor Protection Measures.** The city of Moorpark shall require a habitat connectivity/wildlife corridor evaluation for future development projects that may impact existing connectivity areas and wildlife linkages identified in Figure 5.4-4, *Regional Wildlife Corridor*, of the Draft EIR, which includes the Santa Monica–Sierra Madre Connection corridor. The results of the evaluation shall be incorporated into the project’s biological report required under Mitigation Measure BIO-1d and classified as a Priority 1 project per Mitigation Measure BIO-2. The evaluation shall identify (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) a assessment on areas which would most benefit wildlife crossing and structures with consideration to past, present, and future projects. The evaluation shall also identify project design features that would reduce potential impacts and maintain habitat and wildlife movement. These projects shall avoid, to the extent possible, further encroaching into the Santa Monica-Sierra Madre wildlife corridor. A cumulative assessment on areas which would most benefit wildlife crossing and structures with consideration to past, present, and future projects shall be included in the evaluation. The city shall continue to work in partnership with the County of Ventura, wildlife agencies, organizations, and entities responsible for the protection, management, and enhancement of habitat connectivity and wildlife corridors. To this end, the city shall incorporate the following measures, ~~to the extent practicable,~~ for projects impacting the Santa Monica-Sierra Madre wildlife movement corridors:

- Adhere to the applicable zoning standards.
- Encourage clustering of development.
- Avoid known sensitive biological resources and protect critical linkage areas in place with a minimum 1/2-mile buffer around pinch points, to maximum extent practicable).
- Require new or modified road crossings over streams, wetlands and riparian habitats to include bridging design features with bridge columns located outside the riparian habitat areas, when feasible.

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- Avoid removal of native trees; large, dense-canopied nonnative trees; and understory vegetation. If impacts to trees cannot be avoided, trees should be replaced.
- Follow the existing shielded lighting requirements in the existing municipal code to provide reduced lighting adjacent to sensitive habitat areas.
- Encourage development plans that maximize wildlife movement.
- Provide buffers between development and wetland/riparian areas.
- Protect wetland/riparian areas through regulatory agency permitting process.
- Encourage wildlife-passable fence designs (e.g., 3-strand barbless wire fence) on property boundaries.
- Provide minimum criterion for design features, dimensions, and locations of potential crossings and associated fencing.
- Encourage preservation of native habitat on the undeveloped remainder of developed parcels.
- Minimize road/driveway development to help prevent loss of wildlife due to roadkill and habitat loss.
- Use native, drought-resistant plant species and trees in landscape design. Trees may include coast live oak (*Quercus agrifolia*) and California sycamore (*Platanus racemosa*) and other plants identified by the Audubon Society's Plants for Birds.
- Encourage participation in local/regional recreational trail design efforts.

Page 5.9-13, Section 5.9, *Hazards and Hazardous Materials*, has been revised in response to Comments from the County of Ventura Resources Management Agency (see Comment Letter A4) to include additional relevant policies.

Safety Element

- **Policy SE-1.1 Multi-jurisdictional cooperation.** Continue the development of local preparedness plans, ~~and~~ multi-jurisdictional cooperation and training, and communication for emergency situations.
- **Policy SE-1.3 Emergency coordination.** Coordinate with Ventura County, neighboring cities, and non-governmental partners to provide regular training and outreach to effectively prepare for and respond to hazards and natural disasters.
- **Policy SE-1.6 Community Emergency Response Team.** Expand the capabilities of the Community Emergency Response Team to provide more community members with the tools to respond to disasters.

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Pages 5.9-18 and 5.9-19, Section 5.9, *Hazards and Hazardous Materials*, has been revised in response to Comments on the Moorpark General Plan 2050 policies from the VCFD (see Comment Letter A5).

- **Policy SE-1.1 Multi-jurisdictional cooperation.** Continue the development of local preparedness plans, ~~and~~ multi-jurisdictional cooperation and training, and communication for emergency situations.
- **Policy SE-1.3 Emergency coordination.** Coordinate with Ventura County, neighboring cities, and non-governmental partners to provide regular training and outreach to effectively prepare for and respond to hazards and natural disasters.
- **Policy SE-1.6 Community Emergency Response Team.** Expand the capabilities of the Community Emergency Response Team to provide more community members with the tools to respond to disasters.
- **Policy SE-1.11 Secondary ingress and egress.** Explore secondary means of ingress and egress in areas with existing evacuation constraints, as shown in Figure 11b, for ~~new~~ subdivisions or developments of 10 units or more.
- **Policy SE-1.15 Hazard mapping.** Update hazard mapping with each update to the Safety Element, or earlier, if new information becomes available, to ensure the City relies on best available hazard mapping to inform decisions.
- **Policy SE-1.16 Agency coordination.** Coordinate with Ventura County Fire Department, Ventura County Sheriff's Office, and Ventura County Office of Emergency Services to ensure effective preparation, response, and recovery services are available throughout the community before, during, and after ~~a~~ seismic and wildfire events.
- **Policy SE-1.19 Livestock and large animal evacuation.** Work with Ventura County Animal Services and Ventura County Office of Emergency Services to ensure that owners of livestock and large ~~animal~~ animals are prepared for and have the ability to evacuate during an emergency.

Page 5.9-21, Section 5.9, *Hazards and Hazardous Materials*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to reflect the latest applicable Fire Codes.

All potential future development in Moorpark would be required to comply with the California Building Standards Code; "very high" fire hazard severity zone Fire Safe Regulations; ~~and~~ Moorpark Municipal Code Hillside Management and grading requirements, which include standards to minimize the ignition and spread of wildfire due to slopes; VCFD; and Ventura County Fire Apparatus Access Code. As described in Section 5.20.1.1, *Regulatory Framework*, the Ventura County MHMP and Community Wildfire Protection Plan contain several vegetation management, fuel reduction, and fuel break projects to reduce the uncontrolled spread of wildfire due to vegetation. All potential future development in wildfire-prone areas would also be required to comply with California Government Code 51182~~Public Resources Code Section 4291~~, the California Fire Code,

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VCFC, Ventura County Fire Apparatus Access Code, and the Moorpark Municipal Code. These regulations have specific requirements for new and existing development to create defensible space and extensive fuel reduction within 100 feet of a structure, an ember-resistant zone within 5 feet of a structure, and the overall maintenance of properties to reduce the risk of uncontrolled fires or the spread of fires to other properties.

Furthermore, the Moorpark General Plan 2050 contains policies for existing and new projects that integrate with the MHMP, Ventura County Fire Department Strategic Fire Plan, and other State and regional regulations to reduce wildfire risks associated with vegetation.

Page 5.9-21, Section 5.9, *Hazards and Hazardous Materials*, has been revised in response to Comments on the Moorpark General Plan 2050 policies from the VCFD (see Comment Letter A5).

- **Policy SE-4.1 Fire hazard reduction.** Continue to work with the Ventura County Fire Department and the Ventura Regional Fire Safe Council to implement fire hazard reduction policies and projects, to the extent they are relevant to Moorpark, in the Ventura County Multi-Jurisdictional Hazard Mitigation Plan, the Ventura County Community Wildfire Protection Plan, the General Plan, and the Capital Improvement Program.
- **Policy SE-4.2 California Building Standards Code and Fire Code.** Coordinate with Ventura County Fire Department to ~~Continue to~~ adopt and enforce the most recent version of the California Building Standards Code and Fire Code, as well as California Fire Safe ~~Standards~~ Regulations for new and existing development.
- **Policy SE-4.3 Sufficient water supplies for fire-fighting.** Work with Ventura County Fire Department to ~~Ensure~~ that existing and future development in the city has sufficient water supplies, including adequate flow rates and back-up power supplies nearby for fire-fighting purposes.
- **Policy SE-4.4 Fire ~~safety plans~~ protection plans.** New development within Very High Fire Hazard Severity Zones or the Wildland Urban Interface must prepare a fire ~~safety~~ protection plan for review and approval by the Ventura County Fire Department prior to issuance of building permit.
- **Policy SE-4.5 Ventura County Strategic Fire Plan.** The current version of the Ventura County Fire Department Strategic Fire Plan is hereby incorporated into this Safety Element, by reference, to ensure existing non-conforming development reduces fire hazards by implementing ~~Fire s~~ Safe standards Regulations for roads and vegetation.

Pages 5.9-23 through 5.9-26, Section 5.9, *Hazards and Hazardous Materials*, has been revised in response to Comments on the Moorpark General Plan 2050 policies from the VCFD (see Comment Letter A5).

- **Policy SE-1.1 Multi-jurisdictional cooperation.** Continue the development of local preparedness plans, ~~and~~ multi-jurisdictional cooperation and training, and communication for emergency situations.

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- **Policy SE-1.3 Emergency coordination.** Coordinate with Ventura County, neighboring cities, and non-governmental partners to provide regular training and outreach to effectively prepare for and respond to hazards and natural disasters.
- **Policy SE-1.6 Community Emergency Response Team.** Expand the capabilities of the Community Emergency Response Team to provide more community members with the tools to respond to disasters.
- **Policy SE-1.11 Secondary ingress and egress.** Explore secondary means of ingress and egress in areas with existing evacuation constraints, as shown in Figure 11b, for ~~new~~ subdivisions or developments of 10 units or more.
- **Policy SE-1.15 Hazard mapping.** Update hazard mapping with each update to the Safety Element, or earlier, if new information becomes available, to ensure the City relies on best available hazard mapping to inform decisions.
- **Policy SE-1.16 Agency coordination.** Coordinate with Ventura County Fire Department, Ventura County Sheriff's Office, and Ventura County Office of Emergency Services to ensure effective preparation, response, and recovery services are available throughout the community before, during, and after ~~a~~ seismic and wildfire events.
- **Policy SE-1.19 Livestock and large animal evacuation.** Work with Ventura County Animal Services and Ventura County Office of Emergency Services to ensure that owners of livestock and large ~~animal~~ animals are prepared for and have the ability to evacuate during an emergency.
- **Policy SE-4.1 Fire hazard reduction.** Continue to work with the Ventura County Fire Department and the Ventura Regional Fire Safe Council to implement fire hazard reduction policies and projects, to the extent they are relevant to Moorpark, in the Ventura County Multi-Jurisdictional Hazard Mitigation Plan, the Ventura County Community Wildfire Protection Plan, the General Plan, and the Capital Improvement Program.
- **Policy SE-4.2 California Building Standards Code and Fire Code.** Coordinate with Ventura County Fire Department to ~~Continue to~~ adopt and enforce the most recent version of the California Building Standards Code and Fire Code, as well as California Fire Safe ~~Standards~~ Regulations for new and existing development.
- **Policy SE-4.3 Sufficient water supplies for fire-fighting.** Work with Ventura County Fire Department to ~~Ensure~~ that existing and future development in the city has sufficient water supplies, including adequate flow rates and back-up power supplies ~~nearby~~ for fire-fighting purposes.
- **Policy SE-4.4 Fire ~~safety~~ protection plans.** New development within Very High Fire Hazard Severity Zones or the Wildland Urban Interface must prepare a fire ~~safety~~ protection plan for review and approval by the Ventura County Fire Department prior to issuance of building permit.

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- **Policy SE-4.5 Ventura County Strategic Fire Plan.** The current version of the Ventura County Fire Department Strategic Fire Plan is hereby incorporated into this Safety Element, by reference, to ensure existing non-conforming development reduces fire hazards by implementing ~~Fire sSafe standards~~ Regulations for roads and vegetation.
- **Policy SE-4.7 Egress and ingress.** Require new development within a Very High Fire Hazard Severity Zone to have at least two egress and ingress options, visible street signs that identify evacuation routes, visible street addresses, and adequate water supply for structural suppression in accordance with the California Fire Safe Regulations.
- **Policy SE-7.1 Hazardous materials education.** Work with the Ventura County Public Works Agency to continue educating the community regarding the proper storage, handling, use, and disposal of hazardous household materials.
- **Policy SE-7.2 Hazardous materials business plans.** Require business owners to incorporate into their business plans submitted to the Ventura County Environmental Health Department those measures necessary to minimize hazardous materials accidents due to intense ground shaking potential and flooding. Ensure that the plans are updated as necessary.
- **Policy SE-7.3 Hazardous waste.** Coordinate with the Ventura County Environmental Health Department to manage hazardous waste, including household hazardous waste.
- **Policy SE-9.3 Fair share extension.** Work with Ventura County Fire Department to develop a program for ~~Require~~ new development to fund a fair share extension of fire services to maintain service standards, including personnel and capital improvements costs.

Pages 5.12-1 and 5.12-2, Section 5.12, *Mineral Resources*, has been revised to reflect updated regulations.

The classification process involves the determination of Production-Consumption (P-C) Region boundaries, based on identification of active aggregate operations (Production) and the market area served (Consumption). The P-C regional boundaries are modified to include only the portions of the region that are urbanized or urbanizing and are classified for their aggregate content. An aggregate appraisal further evaluates the presence or absence of significant sand, gravel, or stone deposits that are suitable sources of aggregate. The classification of these mineral resources is a joint effort of the state and the local governments. It is based on geologic factors and requires that the State Geologist classify the mineral resources area as one of four Mineral Resource Zones (MRZ), ~~Scientific Resource Zone (SZ), or Identified Resource Area (IRA),~~ described below.

- **MRZ-1:** A Mineral Resource Zone where adequate information indicates that no significant mineral deposits are present or likely to be present.

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- **MRZ-2:** A Mineral Resource Zone where adequate information indicates that significant mineral deposits are present, or a likelihood of their presence and development should be controlled.
- **MRZ-3:** A Mineral Resource Zone where the significance of mineral deposits cannot be determined from the available data.
- **MRZ-4:** A Mineral Resource Zone where there is insufficient data to assign any other MRZ designation.
- ~~**SZ Areas:** Containing unique or rare occurrences of rocks, minerals, or fossils that are of outstanding scientific significance shall be classified in this zone.~~
- ~~**IRA Areas:** County or State Division of Mines and Geology Identified Areas where adequate production and information indicates that significant minerals are present.~~

Pages 5.15-1 and 5.15-2, Section 5.15, *Public Services*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to reflect the latest applicable Fire Codes.

Regulatory Background

International

International Fire Code

The International Fire Code (IFC) is a model code for regulating minimum fire-safety requirements for new and existing buildings, facilities, storage, and processes. The IFC includes general and specialized technical fire- and life-safety regulations, with topics addressing fire-department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, use and storage of hazardous materials, protection of emergency responders, industrial processes, and various other topics. The IFC is issued by the International Code Council, which is an international organization of building and fire officials. The IFC is not applicable or enforceable unless adopted by the local fire authority.

State

California Building Code

The State of California provides a minimum standard for building design through the California Building Code (CBC) (California Code of Regulations, Title 24, Part 2) which is automatically applicable to all jurisdictions within the state. The CBC is based on the International Building Code but has been modified for California conditions. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local city building officials for compliance with the CBC. Typical fire safety requirements of the CBC include provisions for building materials, types of construction, egress, fire resistance construction, and included provisions for buildings constructed in fire hazard severity zones and wildfire urban interface (WUI) areas such as: the installation of sprinklers in all high-rise buildings; and the establishment of fire resistance standards for fire doors, building materials, and

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particular types of construction. ~~and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.~~

California Fire Code

The California Fire Code is based on the ~~2021~~ IFC and includes amendments from the State of California fully integrated into the code (California Code of Regulations, Title 24, Part 9). The California Fire Code contains provisions for general fire safety, fire protection systems, hazardous materials and processes, building evacuation plans, fire drills, vegetation management and clearance. ~~fire safety-related building standards that are referenced in other parts of Title 24 of the California Code of Regulations.~~ The California Fire Code is updated once every three years, and the 2022 update will go into effect on January 1, 2023.

California Health and Safety Code

Sections 13000 et seq. of the California Health and Safety Code include fire regulations for building standards (also in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

Local

Ventura County Fire Code (VCFC)

The VCFD adopts the Ventura County Fire Code (VCFC), which includes provisions of the California Fire Code and IFC, along with amendments, additions and deletions thereto.

Ventura County Fire Apparatus Access Code

The purpose of the Ventura County Fire Apparatus Access Code is to establish the minimum and cumulative design and maintenance standards for emergency fire access roads within the jurisdictional boundaries of the Ventura County Fire Protection District.

Moorpark Municipal Code

Fire Protection Facilities Fee

Chapter 3.36.020, Fire Protection Facilities Fee, of the municipal code focuses on fire protection and emergency services impacts associated with new development projects. The Fire Protection Facilities Fee is set and required under VCFD Ordinance. It requires any building permit for new construction in Moorpark to include a fee for fire protection facilities. The chapter sets the methods for calculating fees for residential and nonresidential construction and sets how the fire department can use the revenue from the fees. Table 5.15-1, *Fire Protection Facilities Development Impact Fees*, shows the development impact fees by development type in the city.

3. Revisions to the Draft EIR

Table 5.15-2, *Existing Staffing and Equipment*, Section 5.15, *Public Services*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to reflect revised staffing data.

Table 5.15-2 Existing Staffing and Equipment

Type	Staffing	Equipment
Station 40 4185 Cedar Springs St Moorpark, CA 93021	1 Captain 3 Personnel 1 Engineer 1 Firefighter Paramedic	2 Fire Engines 1 Reserve Engine 1 Utility Truck 1 USAR Apparatus
Station 42 295 E. High St. Moorpark, CA 93021	1 Captain 3 Personnel 1 Engineer 1 Firefighter Paramedic	1 Fire Engine 1 Reserve Engine 1 Brush Engine

Source: Cook 2022.

Page 5.15-10, Section 5.15, *Public Services*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to reflect the applicable fire service funding.

Fire vehicles, equipment, and expansion of existing facilities is funded partially through Development Impact Fees (DIF) from new development (Section 3.36.020 of the Moorpark Municipal Code) and well as contractual funding from the State of California Department of Forestry and Fire protection as contract county for services (Cook 2022). ~~However, the majority of the funds for facilities, equipment, and service personnel come from the City's General Fund.~~ Funding from property taxes, as a result of population growth, would be expected to grow roughly proportional to any increase in residential units, businesses, and/or industrial/manufacturing in Moorpark. The additional demand for fire services and protection generated within the city would be satisfied through DIF and property tax ~~the General Fund~~.

Development in the city would also be reviewed by VCFD for compliance with applicable provisions of the California fire and residential codes. Additionally, any future new construction projects in the city would be required to pay DIF ~~that contribute to the City's funding~~ to acquire, construct, and furnish new fire protection and emergency services facilities and to purchase new equipment. This would ensure that future development would benefit from the most current fire prevention and safety standards, which is expected to help keep service demands within projected year-over-year increases.

Furthermore, policies in the Safety Element of the Moorpark General Plan 2050 would ensure adequate protection of public health and safety as they relate to fire and emergency services, such as Policies SE-1.16 and Policies SE-9.1 through SE-9.3. Funding for additional staff, equipment, and facilities to serve the growing population would come from property tax ~~the City's General Funds~~ and DIF. Therefore, impacts to fire protection and emergency services and facilities would be less than significant.

3. Revisions to the Draft EIR

Pages 5.15-10 and 5.15-11, Section 5.15, *Public Services*, has been revised in response to Comments on the Moorpark General Plan 2050 policies from the VCFD (see Comment Letter A5).

- **Policy SE-1.16 Agency coordination.** Coordinate with Ventura County Fire Department, Ventura County Sheriff's Office, and Ventura County Office of Emergency Services to ensure effective preparation, response, and recovery services are available throughout the community before, during, and after ~~a~~ seismic and wildfire events.
- **Policy SE-4.2 California Building Standards Code and Fire Code.** ~~Coordinate with Ventura County Fire Department to~~ Continue to adopt and enforce the most recent version of the California Building Standards Code and Fire Code, as well as California Fire Safe Standards Regulations for new and existing development.
- **Policy SE-4.4 Fire safety protection plans.** New development within Very High Fire Hazard Severity Zones or the Wildland Urban Interface must prepare a ~~fire safety protection~~ fire safety protection plan for review and approval by the Ventura County Fire Department prior to issuance of building permit.
- **Policy SE-4.7 Egress and ingress.** Require new development within a Very High Fire Hazard Severity Zone to have at least two egress and ingress options, visible street signs that identify evacuation routes, visible street addresses, and adequate water supply for structural suppression in accordance with the California Fire Safe Regulations.
- **Policy SE-7.2 Hazardous materials business plans.** Require business owners to incorporate into their business plans submitted to the Ventura County ~~Fire Department~~ Environmental Health Department those measures necessary to minimize hazardous materials accidents due to intense ground shaking potential and flooding. Ensure that the plans are updated as necessary.
- **Policy SE-9.3 Fair share extension.** Work with Ventura County Fire Department to develop a program for ~~Require~~ new development to fund a fair share extension of fire services to maintain service standards, including personnel and capital improvements costs.

Page 5.15-16, Section 5.15, *Public Services*, has been revised in response to Comments on the Moorpark General Plan 2050 policies from the VCFD (see Comment Letter A5).

- **Policy SE-1.16 Agency coordination.** Coordinate with Ventura County Fire Department, Ventura County Sheriff's Office, and Ventura County Office of Emergency Services to ensure effective preparation, response, and recovery services are available throughout the community before, during, and after ~~a~~ seismic and wildfire events.

3. Revisions to the Draft EIR

Page 5.19-31, Section 5.19, *Utilities and Service Systems*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to include fire protection water use.

The VCWD No. 1's 2020 UWMP forecasts that water demands for single-family residential, multifamily residential, and nonresidential uses would increase to 7,755 afy by 2045. Table 5.19-10 shows that potable water demand for Moorpark would be offset by an increase in nonpotable water in areas of new development. Recycled water capacity is increasing by approximately 1,182 afy. Therefore, total water demands for the Moorpark General Plan 2050 are estimated to be 6,479 afy, which is within the 2045 projected demand of 7,755 afy for single-family residential, multifamily residential, and nonresidential uses accounted for in the 2020 UWMP. Additionally, fire protection water (fire flow) for buildings consists of three components: available supply, duration, and flow rate (minimum 20 pressure-state-impact-response (psir) for the required duration). Fire flow is a requirement of both the California Fire Code and the Ventura County Fire Code.

Pages 5.20-2 and 5.20-3, Section 5.20, *Wildfire*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to reflect the latest applicable Fire Hazards Severity Zones.

Fire Hazard Severity Zones and Responsibility Areas

~~CAL FIRE~~ The State Fire Marshal designates fire hazard severity zones as authorized under California Government Code Sections 51175 et seq. Fire Hazards Severity Zones (FHSZ) may be designated very high, high, or moderate. ~~CAL FIRE~~ The State Fire Marshal considers many factors when designating fire severity zones, including fire history, existing and potential vegetation fuel, flame length, blowing embers, terrain, and weather patterns for the area. ~~CAL FIRE~~ The State Fire Marshal designates fire hazard severity zones ~~(FHSZ)~~ in three types of areas depending on which level of government is financially responsible for fire protection:

- **LRA: Local Responsibility Area.** Incorporated communities are financially responsible for wildfire protection. ~~There is one severity zone in the LRA, the very high FHSZ.~~
- **SRA: State Responsibility Area.** ~~CAL FIRE and contracted counties are~~ is financially responsible for wildfire protection. ~~There are three FHSZs — moderate, high, and very high.~~
- **FRA: Federal Responsibility Area.** Federal agencies such as the United States Forest Service, National Park Service, Bureau of Land Management, United States Department of Defense, United States Fish and Wildlife Service, and Department of the Interior are responsible for wildfire protection.

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Pages 5.20-3 through 5.20-5, Section 5.20, *Wildfire*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to reflect the latest regulations.

State Responsibility Area and Very High Fire Hazard Severity Zone Fire Safe Regulations

California Code of Regulations Title 14, Division 1.5, Chapter 7, Subchapter 2, SRA/VHFHSZ Fire Safe Regulations, establishes minimum wildfire protection standards for construction and development in the SRA and very high FHSZ in the LRA, and requires ~~CAL FIRE~~ VCFD to review development proposals and enact recommendations that serve as conditions of approval in these zones. These standards include basic emergency access and perimeter wildfire protection measures; signing and building numbering; private water supply resources for emergency fire use; and vegetation modification. These regulations apply to all residential, commercial, and industrial buildings in the SRA and the LRA very high FHSZ, the siting of new mobile homes, all tentative and parcel maps, and applications for building permits ~~approved before 1991 where these standards were not proposed~~. Fire Safe Regulations also include a minimum setback of 30 feet for all buildings from property lines and/or the center of a road. ~~Section 1273.08, Dead End Roads, of these standards provide regulations for the maximum lengths of single access roadways requiring the following:~~

- ~~Parcels zoned for less than one acre: 800 feet~~
- ~~Parcels zoned for 1 acre to 4.99 acres: 1,320 feet~~
- ~~Parcels zoned for 5 acres to 19.99 acres: 2,640 feet~~
- ~~Parcels zoned for 20 acres or larger: 5,280 feet~~

~~Fire Safe Regulations, Section 1299.03, Fire Hazard Reduction Around Buildings and Structure Requirements, provides defensible space requirements for areas within 30 feet of a structure (Zone 1) and between 30 and 100 feet from a structure (Zone 2). In Zone 1, all dead and dying plants must be removed, as must any flammable vegetation that could catch fire. In Zone 2, horizontal and vertical spacing among shrubs and trees must be created and maintained.~~

California Government Code Section 51182

Government Code Section 51182, Mountainous, Forest-, Brush- and Grass-Covered Lands, is intended for any person who owns, lease, controls, operates, or maintains a building or structure in a mountainous area, forest-covered lands, shrub-covered lands, grass-covered lands, or land that is covered with flammable material, located in a LRA very high FHSZ. This section requires defensible space to be maintained within 100 feet from each side of a structure. An ember-resistant zone is also required within 5 feet of a structure and more intense fuel reduction between 5 and 30 feet of a structure.

~~Public Resources Code Section 4291~~

~~Public Resources Code Section 4291, Mountainous, Forest-, Brush- and Grass-Covered Lands, is intended for any person who owns, lease, controls, operates, or maintains a building or structure in a mountainous area, forest-covered lands, shrub-covered lands, grass-covered lands, or land that is covered with flammable material, regardless of whether the property is in an SRA or very high FHSZ. This section requires defensible space to~~

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~~be maintained within 100 feet from each side of a structure. An ember resistant zone is also required within 5 feet of a structure and more intense fuel reduction between 5 and 30 feet of a structure.~~

California Building Standards Code

The California Buildings Standards Code (California Code of Regulations Title 24) provides 12 different codes for construction and buildings in California. This code is updated every three years, with the most recent version effective January 1, 2020, and the next version going into effect January 1, 2023. ~~VCFD Moorpark~~ regularly adopts the most recent version of the California Building Standards Code, with modifications, into the Moorpark Municipal Code, Title 15, Building and Construction.

Building Design Standards

The California Building Code (CBC), Part 2 of 24 California Code of Regulations, identifies building design standards, including those for fire safety. It is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions under specific amendment rules prescribed by the State Building Standards Commission. Residential buildings are plan checked by local city building officials for compliance with the CBC and any applicable local edits. Typical fire safety requirements of the CBC include the installation of sprinklers in buildings and other facilities; the establishment of fire-resistance standards for fire doors, building materials, and particular types of construction in ~~high~~ fire hazard severity zones; requirements for smoke-detection systems; exiting requirements; and the clearance of debris.

Materials and Methods for Exterior Wildfire Exposure

Chapter 7A of the CBC, Materials and Methods for Exterior Wildfire Exposure, prescribes building materials and construction methods for new buildings in a Fire Hazard Severity Zone or Wildland Interface Fire Area. Chapter 7A contains requirements for roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures. Other requirements include vegetation management compliance, as prescribed in California Fire Code Section 4906 and ~~California Government Code 51182~~~~Public Resources Code 4294~~.

California Fire Code

The California Fire Code incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. This is the official fire code for the State and all political subdivisions. It is found in California Code of Regulations Title 24, Part 9 and, like the CBC, the California Fire Code is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions. The California Fire Code is a model code that regulates minimum fire safety regulations for new and existing buildings; facilities; storage; processes, including emergency planning and preparedness; fire service features; fire protection systems; hazardous materials; fire flow requirements; and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

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Wildland-Urban Interface Areas

Chapter 49 of the California Fire Code, Requirements for Wildland Urban Interface Fire Areas, applies to any geographical area identified as a FHSZ by CAL FIRE. It defines FHSZs, connects to the SRA Fire Safe Regulation requirements for defensible space, and parallels requirements for wildfire protection buildings construction and hazardous vegetation fuel management in other sections of the California Code of Regulations and the Public Resources Code and Government Code. Chapter 49 of the 2022 California Fire Code, which goes into effect January 1, 2023, includes a definition for the Wildland-Urban Interface (WUI) and provides requirements for fire protection plans, ~~landslide~~ landscape plans, long-term vegetation management, and creation and maintenance of defensible space for all new development within the WUI. The VCFC adopted by the VCFD further amends CFC Chapter 49 with more restrictive regulations.

Page 5.20-6, Section 5.20, *Wildfire*, has been added in response to Comments from the VCFD (see Comment Letter A5) to reflect the latest applicable regulations.

Natural Hazards Disclosure Act (AB 38)

The Natural Hazards Disclosure Act requires that sellers of residential real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more state-mapped hazard areas, including Fire Hazard Severity Zones. California law (Civil Code 1102.6f and 1102.19) requires disclosure of building construction features based upon year built, and also the seller has a current Defensible Space Inspection compliance report issued by the local fire authority.

Page 5.20-7, Section 5.20, *Wildfire*, has been added in response to Comments from the VCFD (see Comment Letter A5) to reflect the latest applicable regulations.

Ventura County Community Wildfire Protection Plan

The Ventura County Community Wildfire Protection Plan identifies and prioritizes prefire and postfire management strategies and tactics meant to reduce the loss of values at risk throughout the county. The Ventura County Community Wildfire Plan has been developed upon the priority goals and objectives identified by ~~CAL FIRE~~, Ventura County, and local collaborators. The two primary components of fire prevention in this plan are vegetation management projects where wildfires threaten both human-made and natural systems, and wildfire safety education programs. Additional methods to reduce wildfire hazards in this plan include creating ignition-resistant structures through roofing materials, structure extension and openings, defensible space, and firefighting equipment access to structures. The strategies in this plan will be implemented in cooperation with the Ventura County Fire Department and the Ventura Regional Fire Safe Council. The Ventura County Community Wildfire Protection Plan is currently under revision by the Ventura Regional Fire Safe Council. Once adopted, it will apply through the county.

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Pages 5.20-7 and 5.20-8, Section 5.20, *Wildfire*, has been added in response to Comments from the VCFD (see Comment Letter A5) to reflect the latest applicable regulations.

The Moorpark Municipal Code includes various directives to minimize adverse impacts associated with wildfires in and surrounding Moorpark. Most provisions related to wildfire and evacuation are in the following chapters:

- **Chapter 12.20, Underground Utilities.** This chapter allows the Moorpark City Council to create underground utility districts, in consultation with local utilities and property owners, to incentivize the removal of overhead utility structures and underground installation of these structures. Once created, it is unlawful to construct poles, overhead wires, and associated overhead structures in the district.
- **Chapter 15.04, Administrative Provisions.** This chapter contains two sections relevant to wildfire hazards and evacuation: Section 15.04.050, Fire Prevention, and Section 15.04.100, Disaster Response. Section 15.04.050 adopts the provisions of the Ventura County Fire Code, which include the California Fire Code, for the construction and operation of structures in Moorpark. Section 15.04.100 enables the city manager to enter into mutual aid agreements for emergency building and safety services to ensure effective response to emergencies.
- **Chapter 15.08, Building Code.** This chapter adopts the California Building Code into the Moorpark Municipal Code. Additionally, Section 15.08.060, Fire Hazard Zone Requirements, defines a ~~high fire hazard zone~~ **hazardous fire area** as any area within 500 feet of uncultivated brush-, grass-, or forest-covered land. Buildings in this zone must comply with specific roofing, exterior wall, and underfloor area requirements.

Table 5.20-1, *Historic Wildfires in and Surrounding Moorpark*, Section 5.20, *Wildfire*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to reflect additional historic wildfires.

Table 5.20-1 Historic Wildfires in and Surrounding Moorpark

Year	Fire Name	Size (Acres)
1946	Wiley Canyon	21,266
1953	Shields Lease	11,775
1958	Calumet Canyon	17,213
<u>1970</u>	<u>Clampett</u>	<u>115,000+</u>
<u>1978</u>	<u>Happy Camp</u>	<u>463</u>
1984	Grimes Fire	11,304
1985	Peach Hill	1,991
2001	Walnut Incident	36
2003	Simi Fire	107,560

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Table 5.20-1 Historic Wildfires in and Surrounding Moorpark

Year	Fire Name	Size (Acres)
2005	<u>Campus</u>	<u>20+</u>
2006	Shekell	13,618
<u>2007</u>	<u>Nightsky</u>	<u>Unknown</u>
2009	Guiberson	11,775
2011	Collins	58
<u>2013</u>	<u>Happy Camp</u>	<u>44</u>
2015	Princeton	44
2018	Collins	6
2019	Easy Fire	1,806

Source: CAL FIRE 2020

Page 5.20-25, Section 5.20, *Wildfire*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to reflect the latest applicable Fire Code.

Buildout under the proposed project may result in substantial changes to the circulation patterns or emergency access routes in the Highlands, Championship, Gabbert, and Hitch Ranch portions of the city. However, any potential development under the proposed project would be required to integrate the Emergency Operations Plan as necessary into development to continue its facilitation in evacuation for the people in wildfire-prone areas, as well as the Ventura County Fire Code and the Ventura County Fire Apparatus Access Code. Additionally, future development in the WUI or very high FHSZs would be required to comply with the SRA and Very High Fire Hazard Severity Zone Fire Safe Regulations, the California Building Code, the California Fire Code, and the Moorpark Municipal Code, which have maximum requirements for lengths of single-access roads, minimum widths of roadways, and vegetation fuel management around roadways.

Pages 5.20-25 and 5.20-26, Section 5.20, *Wildfire*, has been revised in response to Comments on the Moorpark General Plan 2050 policies from the VCFD (see Comment Letter A5).

- **Policy SE-1.11 Secondary ingress and egress.** Explore secondary means of ingress and egress in areas with existing evacuation constraints, as shown in Figure 11b, for ~~new~~ subdivisions or developments of 10 units or more.
- **Policy SE-1.19 Livestock and large animal evacuation.** Work with Ventura County Animal Services and Ventura County Office of Emergency Services to ensure that owners of livestock and large ~~animal~~ animals are prepared for and have the ability to evacuate during an emergency.

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- **Policy SE-4.7 Egress and ingress.** Require new development within a Very High Fire Hazard Severity Zone to have at least two egress and ingress options, visible street signs that identify evacuation routes, visible street addresses, and adequate water supply for structural suppression in accordance with the California Fire Safe Regulations.

Page 5.20-26, Section 5.20, *Wildfire*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to reflect the latest applicable Fire Code.

A temporary impact to emergency operations and evacuation under the proposed Moorpark General Plan 2050 could occur from construction of potential future development projects if they were to result in temporary lane closures that would potentially alter evacuation routes. Potential future development in the city would also be required to comply with Very High Fire Hazard Severity Zones Fire Safe Regulations, the California Building Code, the California Fire Code, ~~and~~ the Moorpark Municipal Code, the Ventura County Fire Code, and the Ventura County Fire Apparatus Access Code. These would be limited to the duration of the construction period, and direct impacts of construction would be evaluated during the permit review process by Moorpark, Ventura County Fire Department, and/or CAL FIRE. Review and approval of temporary lane closures, if needed, for future development project in the city would ensure that that no inconsistencies with emergency evacuation plans would occur.

Page 5.20-27, Section 5.20, *Wildfire*, has been revised to address a typo.

Impact 5.20-2: Development associated with buildout of the Moorpark General Plan ~~2030~~2050, due to slope, prevailing winds, and other factors, could exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. [Threshold W-2]

Page 5.20-27, Section 5.20, *Wildfire*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to reflect the latest applicable Fire Code.

All potential future development in Moorpark would be required to comply with the California Building Standards Code, Very High Fire Hazard Severity Zone Fire Safe Regulations, Moorpark Municipal Code Hillside Management, and grading requirements, which include standards to minimize the ignition and spread of wildfire due to slopes, the Ventura County Fire Code, and the Ventura County Fire Apparatus Access Code. Additionally, the Moorpark General Plan 2050 includes Fire Hazard Policy SE-4.2, which requires new and existing development to be consistent with the California Building Standards Code, California Fire Code, and California Fire Safe Standards.

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Page 5.20-28, Section 5.20, *Wildfire*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to reflect the latest applicable Fire Code.

As described in Section 5.20.1.1, *Regulatory Framework*, the Ventura County MHMP and Community Wildfire Protection Plan contain several vegetation management, fuel reduction, and fuel break projects to reduce the uncontrolled spread of wildfire due to vegetation. Additionally, all potential future development in wildfire-prone areas in Moorpark would be required to comply with Very High Fire Hazard Severity Zone Fire Safe Regulations, Government Code 51182 ~~Public Resources Code Section 4294~~, the California Fire Code, and the Moorpark Municipal Code. These regulations have specific requirements for new and existing development to create defensible space and extensive fuel reduction within 100 feet of a structure, an ember-resistant zone within 5 feet of a structure, and the overall maintenance of properties to reduce the risk of uncontrolled fires or the spread of fires to other properties.

Pages 5.20-28, Section 5.20, *Wildfire*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to reflect revised policies.

- **Policy SE-4.1 Fire hazard reduction.** Continue to work with the Ventura County Fire Department and the Ventura Regional Fire Safe Council to implement fire hazard reduction policies and projects, to the extent they are relevant to Moorpark, in the Ventura County Multi-Jurisdictional Hazard Mitigation Plan, the Ventura County Community Wildfire Protection Plan, the General Plan, and the Capital Improvement Program.
- **Policy SE-4.2 California Building Standards Code and Fire Code.** Coordinate with Ventura County Fire Department to ~~Continue to~~ adopt and enforce the most recent version of the California Building Standards Code and Fire Code, as well as California Fire Safe ~~Standards~~ Regulations for new and existing development.
- **Policy SE-4.3 Sufficient water supplies for fire-fighting.** Work with Ventura County Fire Department to ~~Ensure~~ that existing and future development in the city has sufficient water supplies, including adequate flow rates and back-up power supplies nearby for fire-fighting purposes.
- **Policy SE-4.4 Fire ~~safety~~ protection plans.** New development within Very High Fire Hazard Severity Zones or the Wildland Urban Interface must prepare a fire ~~safety~~ protection plan for review and approval by the Ventura County Fire Department prior to issuance of building permit.
- **Policy SE-4.5 Ventura County Strategic Fire Plan.** The current version of the Ventura County Fire Department Strategic Fire Plan is hereby incorporated into this Safety Element, by reference, to ensure existing non-conforming development reduces fire hazards by implementing ~~Fire s~~ Safe standards Regulations for roads and vegetation.

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Page 5.20-30, Section 5.20, *Wildfire*, has been revised in response to Comments from the VCFD (see Comment Letter A5) to reflect the latest applicable Fire Code.

Development in the wildfire-prone areas of eastern Moorpark would also be required to comply with building and design standards in the California Building Code, ~~and California Fire Code,~~ the Ventura County Fire Code, and the Ventura County Fire Apparatus Access Code, which include provisions for fire-resistant building materials, the clearance of debris, and fire safety requirements during demolition and construction activities. Additionally, Government Code 51182 ~~Public Resources Code Section 4294~~ requires a defensible space within 100 feet of a structure and an ember-resistant zone within 5 feet of a structure. Furthermore, Very High Fire Hazard Severity Zone Fire Safe Regulations would ~~prevent~~ minimize structures from being within 30 feet of a roadway, reducing the potential for new roadways to exacerbate wildfire risks. Where not possible, the project applicant is required to provide additional defensible space measures pursuant to the VCFC. These measures, along with policies in the Moorpark General Plan 2050 Safety Element for undergrounding of power lines, creation and maintenance of vegetation, and ensuring adequate water supplies would minimize wildfire risks associated with the installation and maintenance of infrastructure.

Pages 5.20-33 through 5.20-36, Section 5.20, *Wildfire*, has been revised in response to Comments on the Moorpark General Plan 2050 policies from the VCFD (see Comment Letter A5).

- **Policy SE-1.3 Emergency coordination.** Coordinate with Ventura County, neighboring cities, and non-governmental partners to provide regular training and outreach to effectively prepare for and respond to hazards and natural disasters.
- **Policy SE-1.11 Secondary ingress and egress.** Explore secondary means of ingress and egress in areas with existing evacuation constraints, as shown in Figure 11b, for ~~new~~ subdivisions or developments of 10 units or more.
- **Policy SE-1.19 Livestock and large animal evacuation.** Work with Ventura County Animal Services and Ventura County Office of Emergency Services to ensure that owners of livestock and large ~~animal~~ animals are prepared for and have the ability to evacuate during an emergency.
- **Policy SE-4.1 Fire hazard reduction.** Continue to work with the Ventura County Fire Department and the Ventura Regional Fire Safe Council to implement fire hazard reduction policies and projects, to the extent they are relevant to Moorpark, in the Ventura County Multi-Jurisdictional Hazard Mitigation Plan, the Ventura County Community Wildfire Protection Plan, the General Plan, and the Capital Improvement Program.
- **Policy SE-4.2 California Building Standards Code ~~and Fire Code.~~** Coordinate with Ventura County Fire Department to ~~Continue to~~ adopt and enforce the most recent version of the California Building Standards Code and Fire Code, as well as California Fire Safe ~~Standards~~ Regulations for new and existing development.

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- **Policy SE-4.3 Sufficient water supplies for fire-fighting.** Work with Ventura County Fire Department to ~~Ensure~~ that existing and future development in the city has sufficient water supplies, including adequate flow rates and back-up power supplies nearby for fire-fighting purposes.
- **Policy SE-4.4 Fire ~~safety~~ protection plans.** New development within Very High Fire Hazard Severity Zones or the Wildland Urban Interface must prepare a fire ~~safety~~ protection plan for review and approval by the Ventura County Fire Department prior to issuance of building permit.
- **Policy SE-4.5 Ventura County Strategic Fire Plan.** The current version of the Ventura County Fire Department Strategic Fire Plan is hereby incorporated into this Safety Element, by reference, to ensure existing non-conforming development reduces fire hazards by implementing ~~Fire sSafe standards~~ Regulations for roads and vegetation.
- **Policy SE-4.7 Egress and ingress.** Require new development within a Very High Fire Hazard Severity Zone to have at least two egress and ingress options, visible street signs that identify evacuation routes, visible street addresses, and adequate water supply for structural suppression in accordance with the California Fire Safe Regulations.
- **Policy SE-9.3 Fair share extension.** Work with Ventura County Fire Department to develop a program for ~~Require~~ new development to fund a fair share extension of fire services to maintain service standards, including personnel and capital improvements costs.

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Table ES-2, *Summary of Environmental Impacts, Mitigation Measures and Level of Significance After Mitigation*, in Chapter 1, *Executive Summary*, has been revised in response to comment on mitigation measure language identified by the VCAPCD (Comment Letter A6):

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.3 AIR QUALITY			
<p>Impact 5.3-2: Construction activities associated with the proposed project could generate short-term emissions in exceedance of Ventura County APCD’s threshold criteria.</p>	<p>Potentially significant</p>	<p>AQ 1 Construction Phase Air Quality Technical Analysis. Prior to discretionary approval by the City of Moorpark for development projects subject to review under the California Environmental Quality Act (CEQA) (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City of Moorpark Community Development Department for review and approval. The evaluation shall be prepared in conformance with Ventura County Air Pollution Control District (APCD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the Ventura County APCD–adopted thresholds of significance, the City of Moorpark shall require feasible mitigation measures to reduce air quality emissions. Potential measures shall be incorporated as conditions of approval for a project and may include, <u>but are not limited to:</u></p> <ul style="list-style-type: none"> • Require fugitive dust control measures that exceed Ventura County APCD’s Regulation IV, Rule 55, Fugitive Dust, such as: <ul style="list-style-type: none"> ○ Requiring use of nontoxic soil stabilizers to reduce wind erosion. ○ Applying water every four hours to active soil disturbing activities, <u>using reclaimed water, if available.</u> ○ Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. ○ <u>Adding 15 MPH speed limit sign to construction site.</u> ○ <u>Street sweeping when necessary (presence of track-out) using PM-10 certified street sweeper or in conformance with South Coast Air Quality Management District Rule 1186.</u> ○ <u>Placing rumble strips on points of truck or construction vehicle exits.</u> • Use construction equipment rated by the United States Environmental Protection Agency as having exhaust emission limits of Tier 4 interim or higher. 	<p>Significant and Unavoidable</p>

3. Revisions to the Draft EIR

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • Ensure construction equipment is properly serviced and maintained to the manufacturers' standards. • Limit nonessential idling of construction equipment to no more than five consecutive minutes. • Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible. <p>These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Community Development Department.</p>	
<p>Impact 5.3-3: Implementation of the proposed project could additional, long-term emissions in exceedance of Ventura County APCD's threshold criteria and cumulatively contribute to the SCCAB's nonattainment designations.</p>	Potentially significant	<p>AQ 2 Long-Term Air Quality Technical Analysis Prior to discretionary approval by the City of Moorpark for development projects subject to review under the California Environmental Quality Act (CEQA) (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation-related air quality impacts to the City of Moorpark Community Development Department for review and approval. The evaluation shall be prepared in conformance with Ventura County Air Pollution Control District (APCD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the Ventura County APCD-adopted thresholds of significance, the City of Moorpark shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as conditions of approval. Possible mitigation measures to reduce long-term emissions could include but are not limited to:</p> <ul style="list-style-type: none"> • For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks to plug in the anticipated number of refrigerated trailers and reduce idling time and emissions. • Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use or provide justification for not incorporating into the design plan. 	Significant and Unavoidable

3. Revisions to the Draft EIR

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 sec. 2485). • Provide changing/shower facilities as specified in the Nonresidential Voluntary Measures of CALGreen. • Provide bicycle parking facilities per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen. • Provide preferential parking spaces for low-emitting, fuel-efficient, and carpool/van vehicles per the Nonresidential Voluntary Measures of CALGreen. • Provide facilities to support electric charging stations per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen. • Applicant-provided appliances shall be Energy Star–certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star–certified or equivalent appliances shall be verified by the City during plan check. 	

3. Revisions to the Draft EIR

Table ES-2, *Summary of Environmental Impacts, Mitigation Measures and Level of Significance After Mitigation*, in Chapter 1, *Executive Summary*, has been revised in response to comment on mitigation measure language identified by the CDFW (Comment Letter A3):

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.4 BIOLOGICAL RESOURCES			
<p>Impact 5.4-1: Buildout of the Moorpark General Plan 2050 could impact species plant and animal species known to occur in the city.</p>	Potentially significant	<p>BIO-1a Biological Resources Assessment. Applicants for future development projects with suitable natural habitat (except for infill redevelopment projects, subject to the discretion of the Community Development Director), shall conduct a biological resources assessment of the proposed project footprint (including proposed access roads, proposed staging and laydown areas, and a suitable buffer surrounding the project footprint). The biological resources assessment shall be conducted by a qualified biologist and summarized in a biological resources letter report or biological resources technical report that will be submitted to the Moorpark Community Development Department for review and approval prior to be granted a grading permit</p> <p>BIO-1b Biological Reconnaissance-Level Survey. The biological reconnaissance-level survey shall include, but not be limited to:</p> <ul style="list-style-type: none"> An analysis of available literature and biological databases including but not limited to: California Department of Fish and Wildlife (CDFW); California Natural Diversity Database (CNDDB); California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, National Wetland Inventory Database (NWI); USGS National Hydrographic Dataset (NHD); EcoAtlas; and database searches of the US Fish and Wildlife Service Critical Habitat, Environmental Conservation Online System (ECOS), and Information, Planning, and Conservation System (IPaC). <u>Additionally, a review of Missing Linkages in California’s landscape California Natural Diversity Database (CNDDB) layer (ds420), South Coast Missing Linkages (ds419), and Essential Connectivity Areas (ds620) is recommended and South Coast Missing Linkages projected “least cost” linkage designs for the South Coast Ecoregion (South Coast Wildlands 2008 & Penrod 2006), CDFW’s Priority Wildlife Movement Barrier locations report (CDFW 2020a), and National Park Service’s (NPS) collar data relating to mountain lion should be considered.</u> The literature review shall be performed prior to the field survey to identify sensitive biological 	Less than significant with mitigation incorporated

3. Revisions to the Draft EIR

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>resources that were reported previously from the proposed development project vicinity and to help determine the type of sensitive biological resources that may be in the survey area.</p> <ul style="list-style-type: none"> • A review of current land use and land ownership within the proposed development project vicinity. • A field assessment survey that includes mapping vegetation communities in the proposed development project (including but not limited to project footprint, proposed access roads, staging and laydown areas, <u>fuel management zones</u>, and a suitable buffer) <u>following systematic field techniques outlined by CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. The Manual of California Vegetation (MCV) should also be used to inform this mapping as CDFW only tracks rare natural communities using this classification system utilizing the Manual of California Vegetation, 2nd edition (MCV) and the National Vegetation Classification System (NVCS) or the currently accepted standard for vegetation mapping and classification.</u> An evaluation of each mapped vegetation community's State and Global rarity ranks shall be determined using CDFW's Vegetation Classification and Mapping Program (VegCAMP). <u>Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. An evaluation of the project's potential to support special status plant and wildlife species. The environmental document shall provide measures to fully mitigate the loss of habitat.</u> • An evaluation of the proposed development project's potential to support special status plant and wildlife species. <u>Biological Resources Report shall consider impacts to species identified on Ventura County's Locally Important Species List and impacts to other natural communities including but not limited to coastal sage scrub communities and oak woodland communities.</u> • An evaluation of nesting habitat for migratory and special status bird species. • An evaluation of potential impacts to bats and roosts from ground-disturbing activities. 	

3. Revisions to the Draft EIR

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • A general assessment of potential jurisdictional areas, including wetlands and riparian habitats. • An evaluation of potential local and regional wildlife movement corridors. <p>BIO-1c Focused Species Surveys. If one or more special status plant or animal species has the potential to occur within the proposed development project area (including but not limited to project footprint, proposed access roads, staging and laydown areas, and a suitable buffer), a qualified biologist shall conduct additional focused surveys for said species using the most recently updated protocols recommended by natural resource agencies or, if not available, standards accepted in the professional biological community to survey that taxonomic group, community, or species. <u>CDFW currently recommends that 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. The Manual of California Vegetation (MCV) shall also be used to inform this mapping.</u> If an established protocol is not available for a special status species, the qualified biologist will consult with the City and CDFW or USFWS to determine the appropriate survey protocol. The focused species survey(s) will be at a level to determine the presence/absence of these species and to adequately evaluate potential direct and/or indirect impacts to these species. Adjoining properties shall also be surveyed (as access permits) where direct or indirect project effects, such as those from fuel modification or herbicide application, could potentially extend off-site. To the extent possible, the focused species surveys should be conducted during nondrought years at the time of year when species are both evident and identifiable. The focused survey shall record the location and boundary of special status species by use of global positioning system (GPS). The number of individuals shall be counted (if population is small) or estimated (if population is large). If applicable, information about the percentage of individuals in each life stage should be provided (seedlings, reproductive individuals, adults, nestlings, juveniles, transients or migrant individuals, etc.). If feasible, images of the target species and representative habitats should be included to support information and descriptions. Results of focused species surveys shall be summarized in the proposed development project's Biological Resources Technical Report. <u>The Report shall include a detailed map</u></p>	

3. Revisions to the Draft EIR

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p><u>(1:24,000 or larger) showing which plants or populations will be impacts. The Report shall also include a table that documents the number of sensitive plants and acres of supporting habitat impacts, and plant 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). Identified rare plants shall also be plotted within the map.</u></p> <p>BIO-1d Biological Resources Report. The results of the biological survey for proposed development projects with no significant impacts may be presented in a biological survey letter report. For proposed development projects with significant impacts that require mitigation to reduce the impacts to below a level of significance, and/or agency consultation and permitting, the results of the biological survey shall be presented in a biological technical report. The impact analysis shall consider impacts from areas subject to fuel modification and grading to accommodate the development.</p> <p>BIO-2 Special-Status Species, Sensitive Habitats, Wetlands, Other Non-wetland Waters, Native Wildlife Nursery Sites, and Wildlife Corridors. If a sensitive biological resource is identified during field surveys (see BIO-1b and BIO-1c), the City shall require implementation of mitigation measures at the project level that fully account for the adversely affected resource. To the maximum extent feasible, mitigation measures should adhere to the following order of priority to reduce adverse impacts of a proposed project to the resource: avoid impacts, minimize impacts, and compensate for impacts. Mitigation measures shall be used on a project-level basis and be tailored to on-site conditions and sensitive biological resources present.</p> <ul style="list-style-type: none"> • Priority 1, Avoidance of Impacts. Proposed development shall avoid impacts to the maximum extent feasible by not taking certain actions or parts of an action. Projects shall be sited to avoid direct or indirect impacts on the resource and include measures such as implementing no-disturbance buffers (e.g., nesting bird buffer areas during construction, siting staging areas outside buffer area) or implementing project-specific design features (e.g., wildlife-friendly fencing and lighting in a wildlife corridor), such that indirect adverse effects of project development are avoided. This shall include flagging all plants and/or perimeter of populations; stop-work buffers around plants and/or populations (e.g., flagged perimeter plus 50 feet); restrictions on ground-disturbing activities 	

3. Revisions to the Draft EIR

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>within protected areas; relocation of staging and other material piling areas away from protected areas; restrictions on herbicide use and/or type of herbicide and/or application method within 100 feet of sensitive plants; and worker education and training. This shall especially apply to <u>the Santa Monica-Sierra Madre wildlife corridor and the Tierra Rejada Vernal Pool Preserve in the Carlsberg Specific Plan area and designated critical habitat for Lyon's pentachaeta and Riverside fairy shrimp (Streptocephalus woottoni) in the southeast corner of Moorpark. Projects should avoid sensitive natural communities, including locally important communities such as oak woodlands and alliances with a State Rank of S1-S3 that fall under the mixed scrub characterization, to the maximum extent practicable.</u></p> <ul style="list-style-type: none"> Priority 2, Minimize Impacts. Proposed development shall be conditioned to minimize adverse impacts by limiting the degree or magnitude of the action and its implementation to less than significant to the maximum extent feasible. Other mitigation measures may include reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action. Measures to mitigate the spread of invasive plant species and invasive wildlife species (e.g., New Zealand mudsnail) shall include but will not be limited to: cleaning of equipment, footwear, and clothing before entering a construction site and the identification and treatment of significant infestations of invasive plant species within a project site. Priority 3, Offset Impacts. Offsetting impacts can be done by replacing or providing substitute resources or by rectifying the impact by repairing, rehabilitating, or restoring the impacted environment. Offset mitigation ratios for protected sensitive resources will be established based on the rarity of the resource, quality of affected habitat associated with the resource, temporary and permanent losses to habitat function, the type of mitigation proposed (restoration, enhancement, preservation, establishment), and other requirements associated with state or federal permits. Mitigation ratios will be determined at the project level in consultation with the city, the qualified biologist, and, where applicable, federal or state agencies with jurisdiction over the resource (e.g., CDFW, USACE, USFWS). 	

3. Revisions to the Draft EIR

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>If impacts on a protected sensitive biological resource are unavoidable, then the project proponent shall mitigate for the type of resource as follows:</p> <ul style="list-style-type: none"> • Endangered, Rare, Threatened, or Candidate Species. The applicant shall obtain incidental take authorization from USFWS (16 US Code Section 1531 et seq.) or CDFW (California Fish and Game Code Sections 2050–2115.5) prior to commencing development of the project site; apply minimization measures or other conditions required under the incidental take authorization; and provide equivalent compensation for the unavoidable losses of these resources, generally at a minimum ratio of 1:1. Compensation may include purchasing credits from a USFWS- or CDFW-approved mitigation bank or restoring or enhancing habitat within the project site or outside of the project site. • Special Status Species (not listed). The applicant shall provide equivalent compensation for impacts on special status species by restoring or significantly enhancing existing habitat where the species occurs or by acquiring or protecting land that provides habitat function for affected species and is at least equivalent to the habitat function removed or degraded as a result of project implementation. <p>If impacts on sensitive habitats, wetlands, other nonwetland waters, riparian habitats, native wildlife nursery sites, and wildlife corridors cannot be avoided, the project applicant shall:</p> <ul style="list-style-type: none"> • Federal- or State-Protected Sensitive Habitats. Obtain the required regulatory authorization (e.g., Section 404 permits for impacts on waters of the United States, 401 water quality certification from the Regional Water Quality Control Board, a Streambed Alteration Agreement for impacts on aquatic or riparian habitats within CDFW jurisdiction under Fish and Game Code Section 1600), and provide equivalent compensation for the unavoidable losses of the above-mentioned resources such that there is no net loss. • Other Protected Sensitive Habitats (includes sensitive natural communities, habitat connectivity and wildlife corridors, native wildlife nursery or overwintering sites). Provide compensation for other protected sensitive habitats, which may include the restoration, enhancement, or preservation of the aforementioned habitats within or outside of the project site, or the purchasing of credits at an existing mitigation bank or in-lieu fee 	

3. Revisions to the Draft EIR

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>program deemed acceptable by the Moorpark Community Development Director.</p> <p>All compensatory mitigation sites shall be protected in perpetuity through a conservation easement (if off-site), or deed restriction (or other comparable legal instrument) if on-site.</p> <p><u>If impacts to oak woodland or the understory vegetation cannot be avoided, the project applicant shall comply existing Historic Trees, Native Trees, and Mature Trees Ordinance:</u></p> <p><u>The project applicant shall prepare Weed Management Plan, which shall:</u></p> <ul style="list-style-type: none"> • <u>Ensure that irrigation proposed in fuel modification zones do not allow for the introduction of invasive Argentine ants.</u> • <u>Prevent non-native weeds including noxious weeds (as listed by the California Invasive Plant Council) from becoming established to control the local spread of invasive plants, both during and after construction.</u> • <u>Include monitoring for a minimum of three years post development to identify and reduce the possible introduction of Argentine ants. The monitoring plan shall include monthly site visits (and weekly during the rainy season) to monitoring the spread of invasive weeds onsite and to adjacent lands.</u> • <u>Include annual threshold limits and eradication targets.</u> <p><u>For projects that remove vegetation that could host pest species, the applicant shall 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, polyphagous shot hole borer, and goldspotted oak borer. If invasive pests and/or diseases are detected, the applicant, in coordination with the project arborist, shall provide an infectious tree disease management plan. 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.</u></p>	

3. Revisions to the Draft EIR

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>BIO-3 Demarcate Work Area Boundary. The proposed development proponent shall prevent impacts to unprotected common and sensitive vegetation communities in areas adjacent to the project area. Prior to the initial vegetation clearing activities or ground disturbance in new areas, the approved project grading limits shall be marked with stakes or other highly visible materials that will be clearly visible to equipment operators and biological monitors during all vegetation clearing or ground disturbing activities. All equipment operators and project personnel shall be instructed about the restrictions the boundary markers represent and that vegetation removal or other disturbance outside of the boundary markers shall be avoided.</p> <p>BIO-4 Preconstruction Special Status Species Surveys. If sensitive biological resources are identified as having potential to occur within or immediately adjacent to the proposed development project area, a preconstruction special status species survey shall be conducted by a qualified biologist no more than 14 days prior to ground disturbing activities to ensure unsubstantiated impacts are avoided or minimized to the extent feasible. In addition, for species with potential to occur within or adjacent to the proposed development project area and having species-specific preconstruction or take avoidance survey guidelines (e.g. burrowing owl), surveys shall be conducted in accordance with the most recent survey guidelines by a qualified biologist for that species.</p> <p>BIO-5 Worker Environmental Awareness Education. If sensitive biological resources are known to occur within or adjacent to the proposed development project area, a project-specific contractor training program shall be developed and implemented to educate project contractors about the sensitive biological resources within and adjacent to the proposed development project area and the measures being implemented to avoid and/or minimize impacts to these species or their habitat. A qualified biologist shall develop and implement the contractor training program.</p> <p>BIO-6 Biological Monitoring. If sensitive biological resources are present within or adjacent to the proposed development project area and impacts may occur from implementation of construction activities, a qualified biological monitor may be required during a portion or all of the construction activities to ensure impacts to the sensitive biological resources are avoided or minimized to the extent feasible. The specific biological monitoring requirements shall be</p>	

3. Revisions to the Draft EIR

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		evaluated on a project-by-project basis. The qualified biological monitor shall be approved by the City on a project-by-project basis based on applicable experience with the sensitive biological resources that may be impacted.	
<p>Impact 5.4-2: Implementation of the proposed Moorpark General Plan 2050 could impact sensitive natural communities, including wetlands and riparian habitat.</p>	Potentially significant	<p>Mitigation Measures BIO-1 through BIO-6 are also applicable to Impact 5.4-2.</p> <p>BIO-7 Aquatic Resources Delineation and Regulatory Permitting. The City of Moorpark shall require applicants of development projects that have the potential to affect jurisdictional resources to contract with a qualified biologist to conduct a jurisdictional delineation to map the extent of wetlands and nonwetland waters; determine jurisdiction; consider changes in upstream and downstream drainage patterns, runoff, and sedimentation; and assess potential impacts (including an evaluation of potential changes in upstream and downstream drainage patterns, runoff, and sedimentation). The delineation shall be conducted pursuant to the U.S. Fish and Wildlife Service wetland definition adopted by the California Department of Fish and Wildlife. The results of the delineation shall be presented in a wetland delineation report and shall be incorporated into the CEQA document(s) required for approval and permitting of the proposed development project.</p> <p><u>Projects shall prioritize avoidance of impacts to streams, wetlands and associated natural communities.</u> Applicants of development projects that have the potential to impact jurisdictional features, as identified in the wetland delineation letter report, shall obtain permits and authorizations from the US Army Corps of Engineers for a Section 404 Clean Water Act (CWA) Permit, to the California Department of Fish and Wildlife (CDFW) for a Section 1600 Lake or Streambed Alteration Agreement (SAA), and/or to the Regional Water Quality Control Board (RWQCB) for a Section 401 Water Quality Certification. The regulatory agency authorization(s) shall include impact avoidance and minimization measures as well as mitigation measures for unavoidable impacts. Specific avoidance, minimization, and mitigation measures for impacts to jurisdictional resources shall be determined through discussions with the regulatory agencies during the proposed development project permitting process and may include <u>avoidance of resources, on-site or off-site creation, enhancement or restoration, and/or protection and management of</u></p>	Significant and Unavoidable (cumulative habitat loss)

3. Revisions to the Draft EIR

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<u>mitigation lands in perpetuity monetary contributions to a mitigation bank or habitat creation, restoration, or enhancement.</u>	
<p>Impact 5.4-3: Buildout of the Moorpark General Plan 2050 could impact undetermined amounts of wetlands and jurisdictional waters regulated by the US Army Corps of Engineers, California Department of Fish and Wildlife, and Los Angeles Regional Water Quality Control Board.</p>	Potentially significant	Mitigation Measure BIO-7 is also applicable to Impact 5.4-3.	Less than significant with mitigation incorporated
<p>Impact 5.4-4: Development pursuant to the Moorpark General Plan 2050 could adversely impact wildlife movement in the Santa Monica–Sierra Madre Connection Corridor.</p>	Potentially significant	<p>Mitigation Measures BIO-1(a-d) and BIO-2 are also applicable to Impact 5.4-4.</p> <p>BIO-8 Habitat Connectivity/Wildlife Corridor Protection Measures. The city of Moorpark shall require a habitat connectivity/wildlife corridor evaluation for future development projects that may impact existing connectivity areas and wildlife linkages identified in Figure 5.4-4, Regional Wildlife Corridor, of the Draft EIR, which includes the Santa Monica–Sierra Madre Connection corridor. The results of the evaluation shall be incorporated into the project’s biological report required under Mitigation Measure BIO-1d and <u>classified as a Priority 1 project per Mitigation Measure BIO-2. The evaluation shall identify (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) a assessment on areas which would most benefit wildlife crossing and structures with consideration to past, present, and future projects.</u> The evaluation shall also identify project design features that would reduce potential impacts and maintain habitat and wildlife movement. <u>These projects shall avoid, to the extent possible, further encroaching into the Santa Monica-Sierra Madre wildlife corridor. A cumulative assessment on areas which would most benefit wildlife crossing and structures with consideration to past, present, and future projects shall be included in the evaluation.</u> The city shall continue to work in partnership with the County of Ventura, wildlife agencies, organizations, and entities responsible for the protection, management, and enhancement of habitat</p>	Less than significant with mitigation incorporated

3. Revisions to the Draft EIR

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>connectivity and wildlife corridors. To this end, the city shall incorporate the following measures, to the extent practicable, for projects impacting the <u>Santa Monica-Sierra Madre wildlife movement corridors</u>:</p> <ul style="list-style-type: none"> • Adhere the applicable zoning standards. • Encourage clustering of development. • Avoid known sensitive biological resources and protect critical linkage areas in place with a minimum 1/2-mile buffer around pinch points, to maximum extent practicable). • Require new or modified road crossings over streams, wetlands and riparian habitats to include bridging design features with bridge columns located outside the riparian habitat areas, when feasible. • Avoid removal of native trees; large, dense-canopied nonnative trees; and understory vegetation. If impacts to trees cannot be avoided, trees should be replaced. • Follow the existing shielded lighting requirements in the existing municipal code to provide reduced lighting adjacent to sensitive habitat areas. • Encourage development plans that maximize wildlife movement. • Provide buffers between development and wetland/riparian areas. • Protect wetland/riparian areas through regulatory agency permitting process. • Encourage wildlife-passable fence designs (e.g., 3-strand barbless wire fence) on property boundaries. • <u>Provide minimum criterion for design features, dimensions, and locations of potential crossings and associated fencing.</u> • Encourage preservation of native habitat on the undeveloped remainder of developed parcels. • Minimize road/driveway development to help prevent loss of wildlife due to roadkill and habitat loss. • Use native, drought-resistant plant species and trees in landscape design. Trees may include coast live oak (<i>Quercus agrifolia</i>) and California sycamore (<i>Platanus racemosa</i>) and other plants identified by the Audubon Society's Plants for Birds. • Encourage participation in local/regional recreational trail design efforts. 	

3. Revisions to the Draft EIR

Table ES-2, *Summary of Environmental Impacts, Mitigation Measures and Level of Significance After Mitigation*, in Chapter 1, *Executive Summary*, has been revised to correct a typo:

Table ES-2 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.20-2: Development associated with buildout of the Moorpark General Plan 2030 2050, due to slope, prevailing winds, and other factors, could exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	Potentially significant	No feasible mitigation measures are available.	Significant and Unavoidable

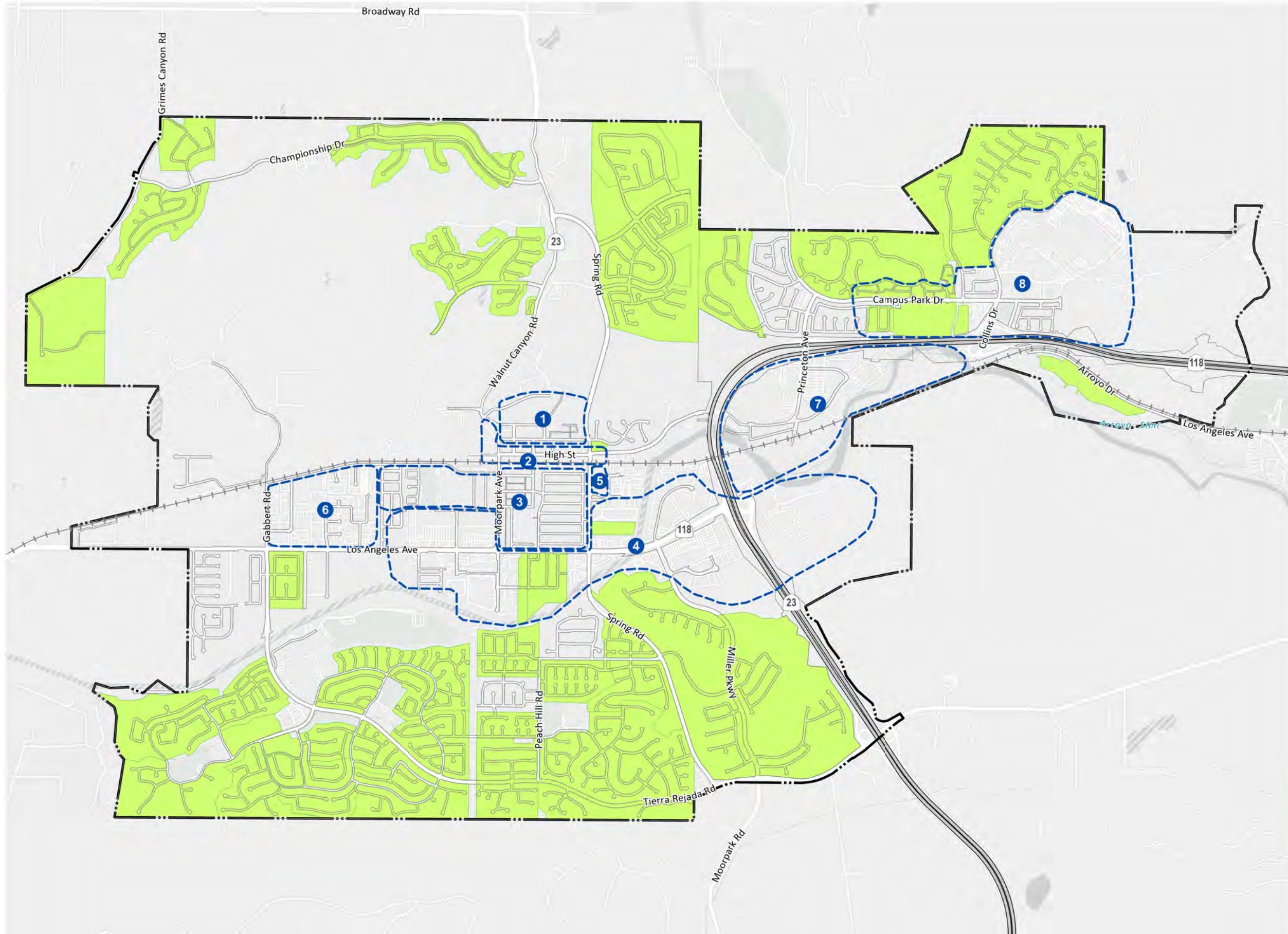
3. Revisions to the Draft EIR

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Appendix A Revised Draft EIR Figures

Appendix

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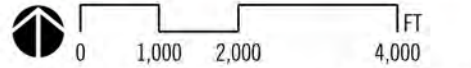
ENVIRONMENTAL SETTING

Figure 4.1
Neighborhoods and Districts

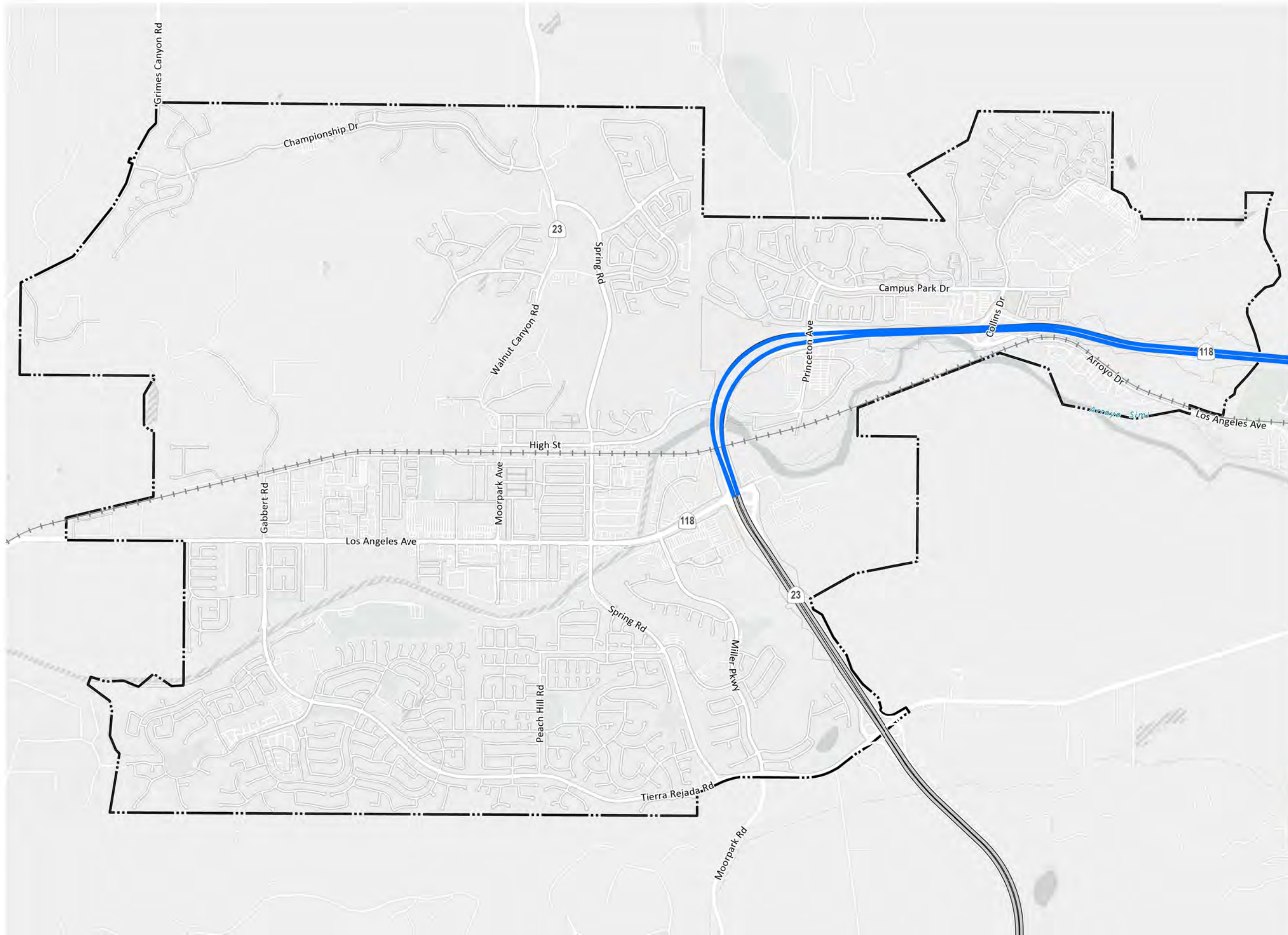
- City Boundary
 - Railroad
 - Neighborhood and District Areas
- District Name
- 1 - Charles Street Neighborhood
 - 2 - Downtown District
 - 3 - Traditional/Core Neighborhood
 - 4 - Los Angeles Avenue Corridor
 - 5 - Spring Street Corridor
 - 6 - Western Industrial Park
 - 7 - Princeton Industrial Area/Virginia Colony
 - 8 - College Neighborhood
- Residential Areas Governed by an Active Homeowners Associations



Draft Environmental Impact Report





Source: PlaceWorks, 2022 Date: 2/24/2023



Aesthetics

Figure 5.1-1
Scenic Corridors

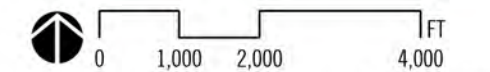
-  City Boundary
-  Railroad

CalTrans Scenic Highways

-  Eligible Routes



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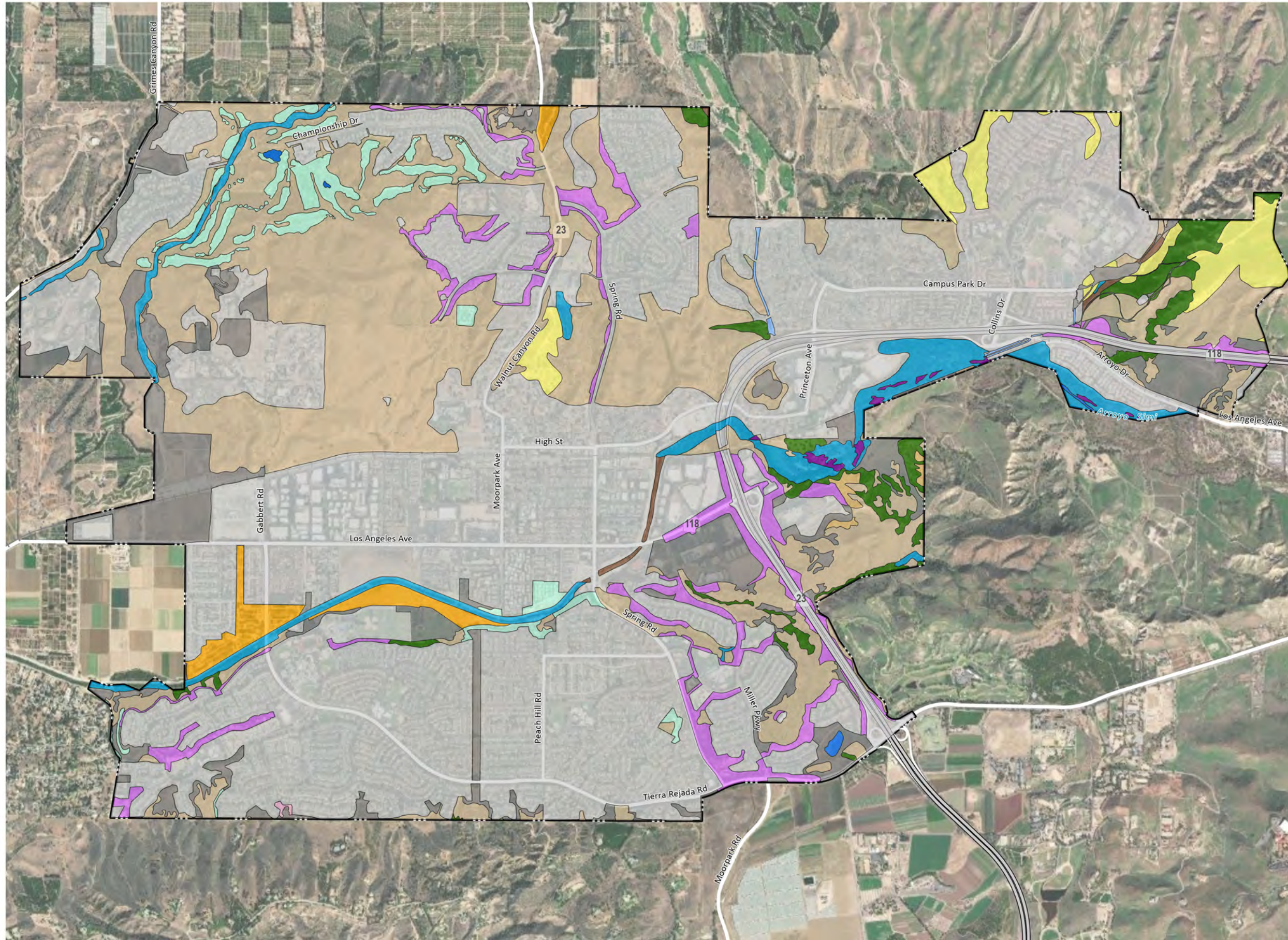


Source: CalTrans, 2014

Date: 2/24/2023

Biological Resources

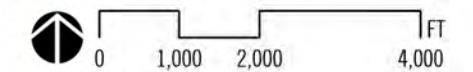
Figure 5.4-1
Vegetation Communities



- City Boundary
- Vegetation Communities**
- 1 - Agriculture
- 2 - Alluvial Scrub
- 3 - Channel
- 4 - Chaparral
- 5 - Developed
- 6 - Disturbed
- 7 - Eucalyptus Woodland
- 8 - Landscaped
- 9 - Mixed Scrub
- 10 - Native Bunchgrass Grassland
- 11 - Oak Woodland
- 12 - Open Water
- 13 - Ornamental
- 14 - Riparian
- 15 - Nonnative Wetland



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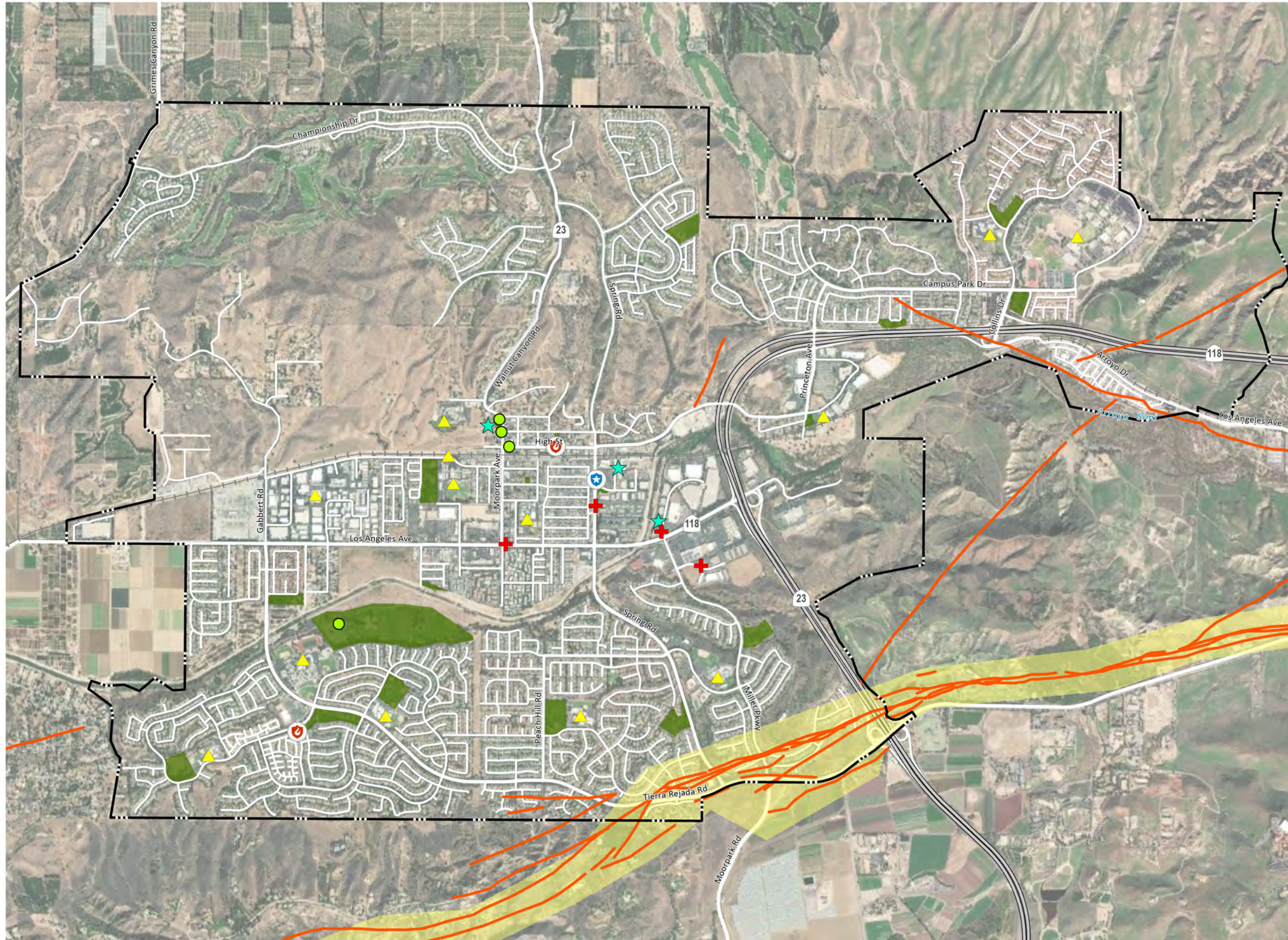


Source: PlaceWorks, 2022

Date: 2/27/2023

Geology & Soils

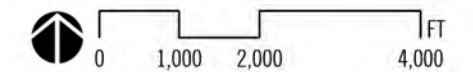
Figure 5.7-2
Earthquake Zones and Faults



- City Boundary
- Earthquake Faults
- Aquist-Priolo Earthquake Fault Zone
- Critical Facility
 - Police Services Center
 - Fire Station
 - Community Facility
 - Government Facility
 - Medical
 - School/College Campuses
 - Parks

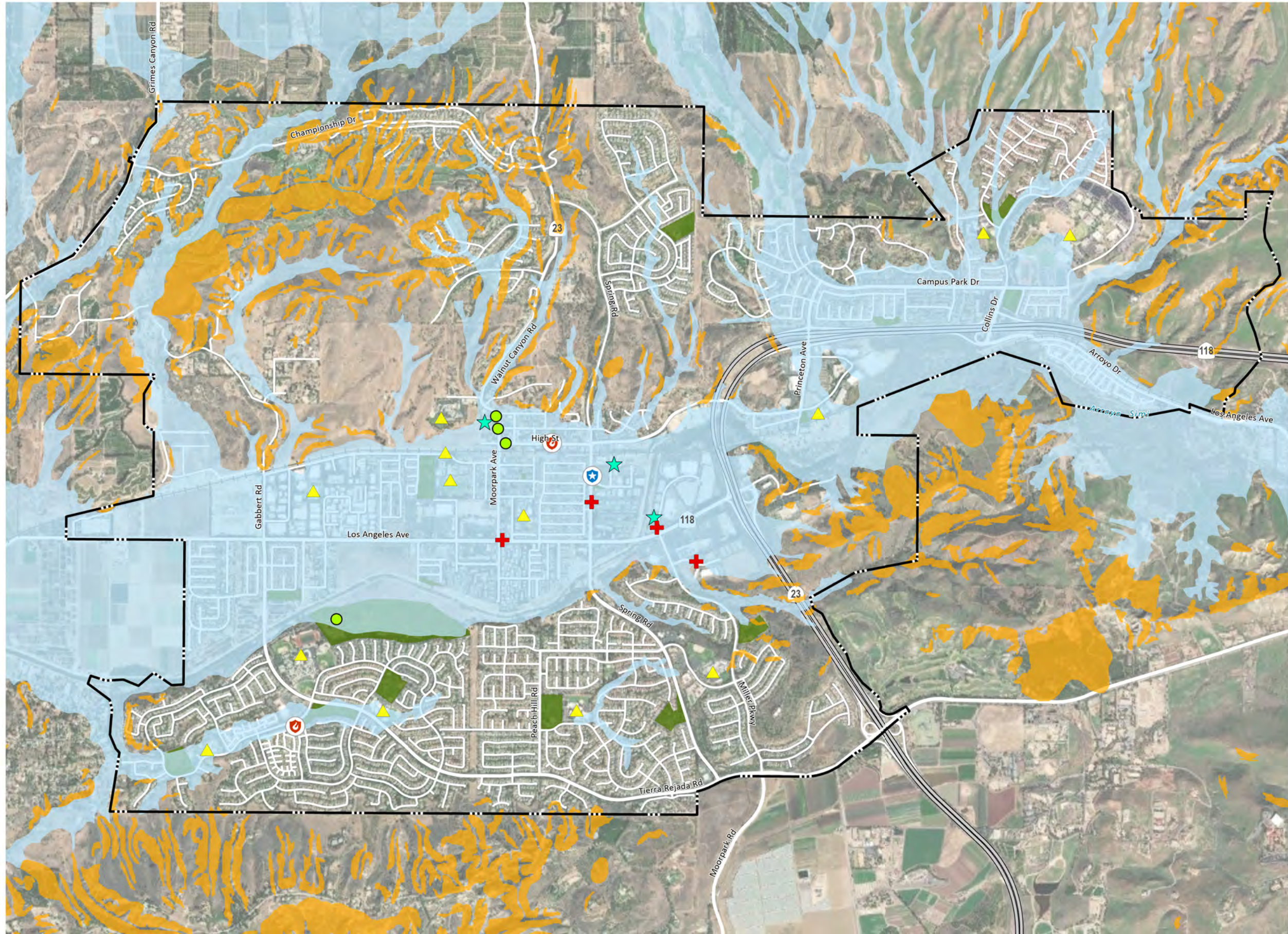


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Source: PlaceWorks, 2022

Date: 2/24/2023

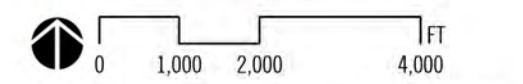


Geology & Soils
 Figure 5.7-3
 Seismic Hazard Zones

- City Boundary
- Earthquake-Induced Landslide Zones
- Liquefaction Zones
- Critical Facility**
- Police Services Center
- Fire Station
- Community Facility
- Government Facility
- Medical
- School/College Campuses
- Parks



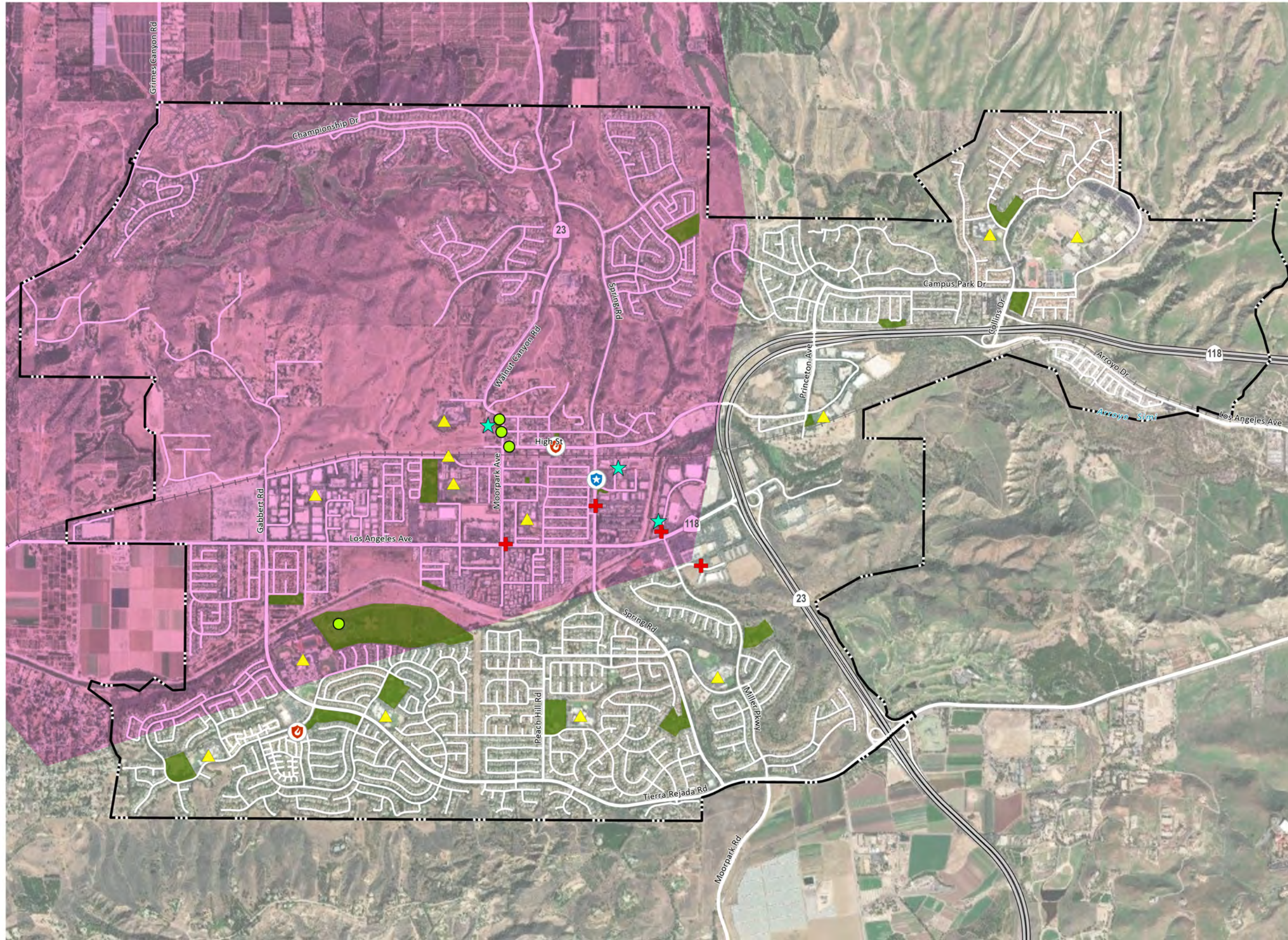
Draft Environmental Impact Report



Source: PlaceWorks, 2022 Date: 2/24/2023

Geology & Soils

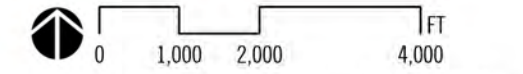
Figure 5.7-4
Subsidence Hazard Zones



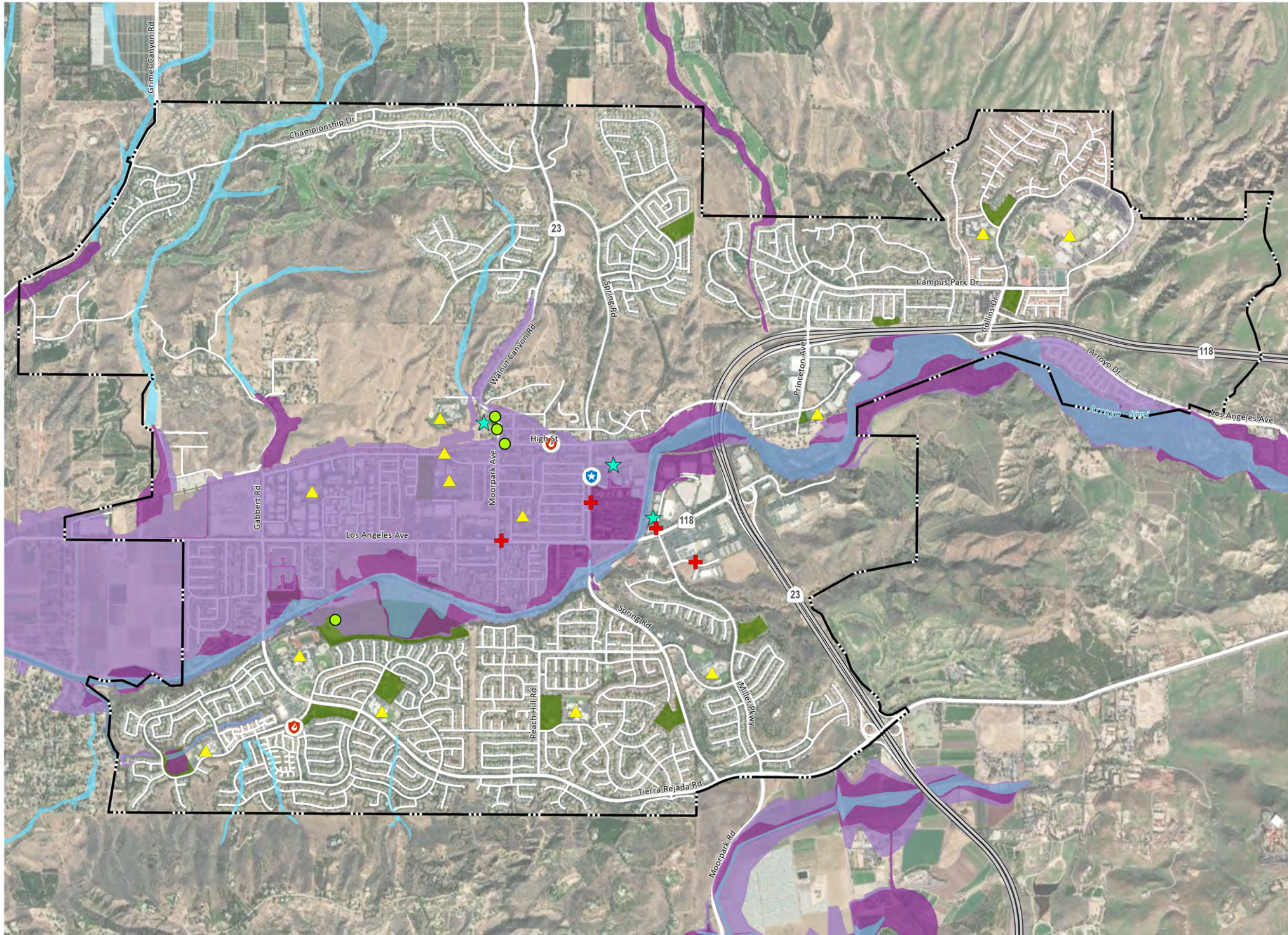
- City Boundary
- Subsidence Hazard Area
- Critical Facility
 - Police Services Center
 - Fire Station
 - Community Facility
 - Government Facility
 - Medical
 - School/College Campuses
 - Parks



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Source: PlaceWorks, 2022 Date: 2/24/2023



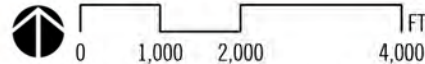
Hydrology

Figure 5.10-5
Flood Zones

- City Boundary
- Critical Facility**
- Police Services Center
- Fire Station
- Community Facility
- Government Facility
- Medical
- School/College Campuses
- Parks
- Flood Zones**
- 100 year Flood Zone
- 500 year Flood Zone
- Regulatory Floodway
- DWR Awareness 100 Year Flood Zone

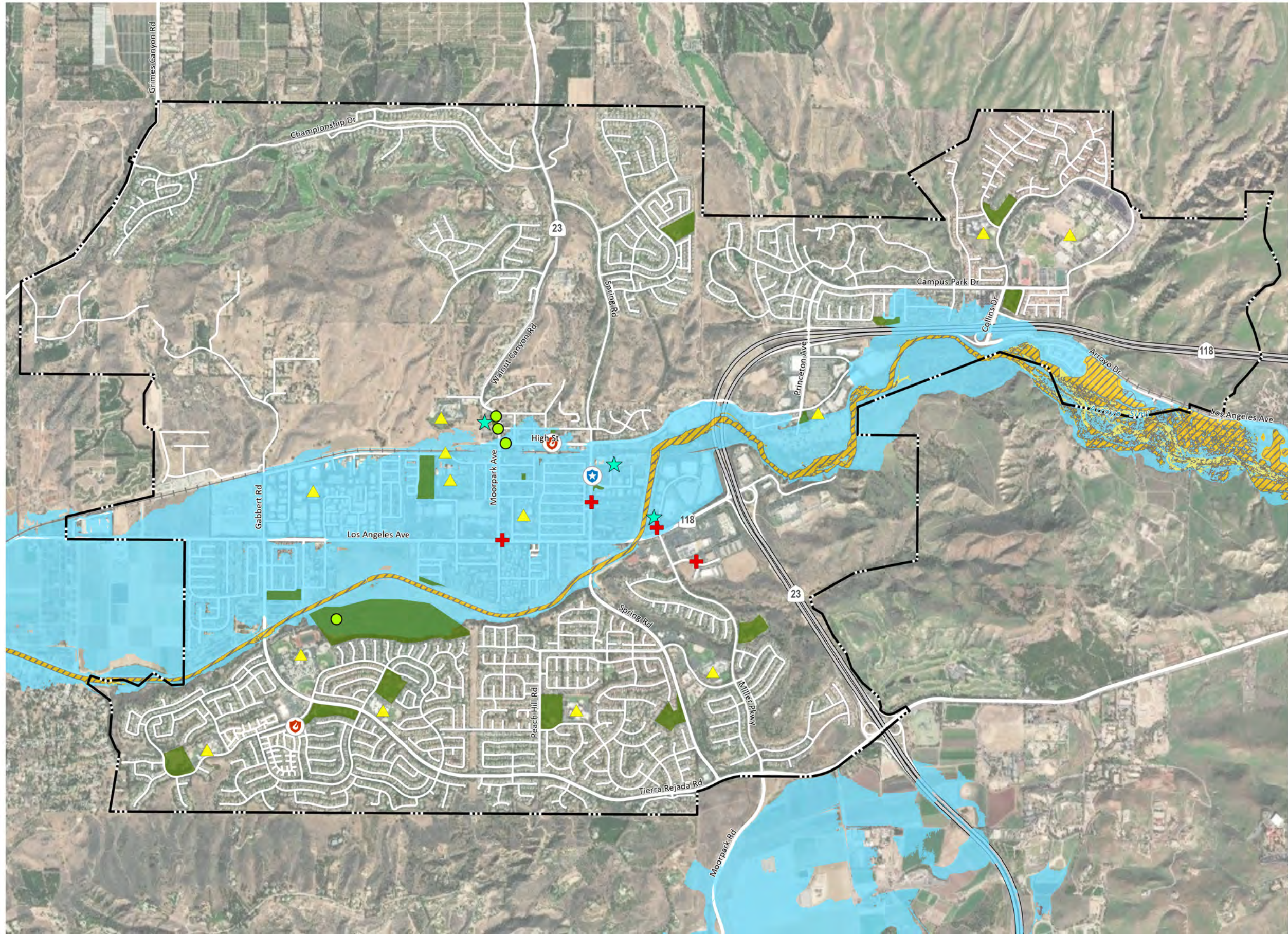


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Source: PlaceWorks, 2022;
FEMA, 2021; DWR, 2021

Date: 2/24/2023

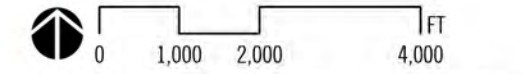


Hydrology
 Figure 5.10-6
 Dam Inundation Areas

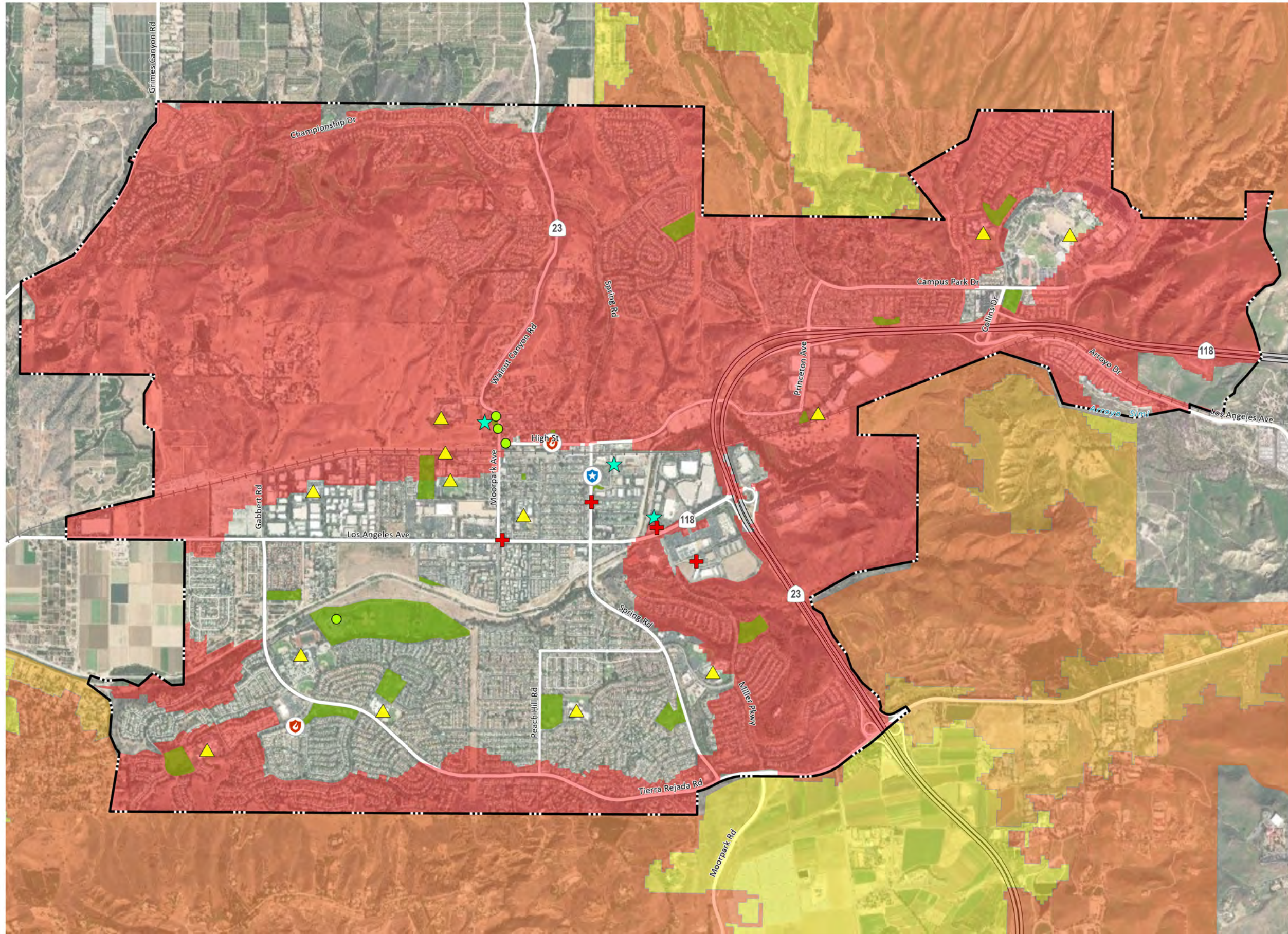
- City Boundary
- Critical Facility**
- Police Services Center
- Fire Station
- Community Facility
- Government Facility
- Medical
- School/College Campuses
- Parks
- Dam Inundation Area**
- Sycamore Canyon
- Las Lajas
- Sinaloa Lake
- Wood Ranch



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Source: PlaceWorks, 2022; DWR, 2021 Date: 2/24/2023



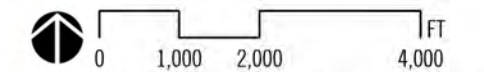
Wildfire

Figure 5.20-1
Very High Fire Hazard Severity Zones

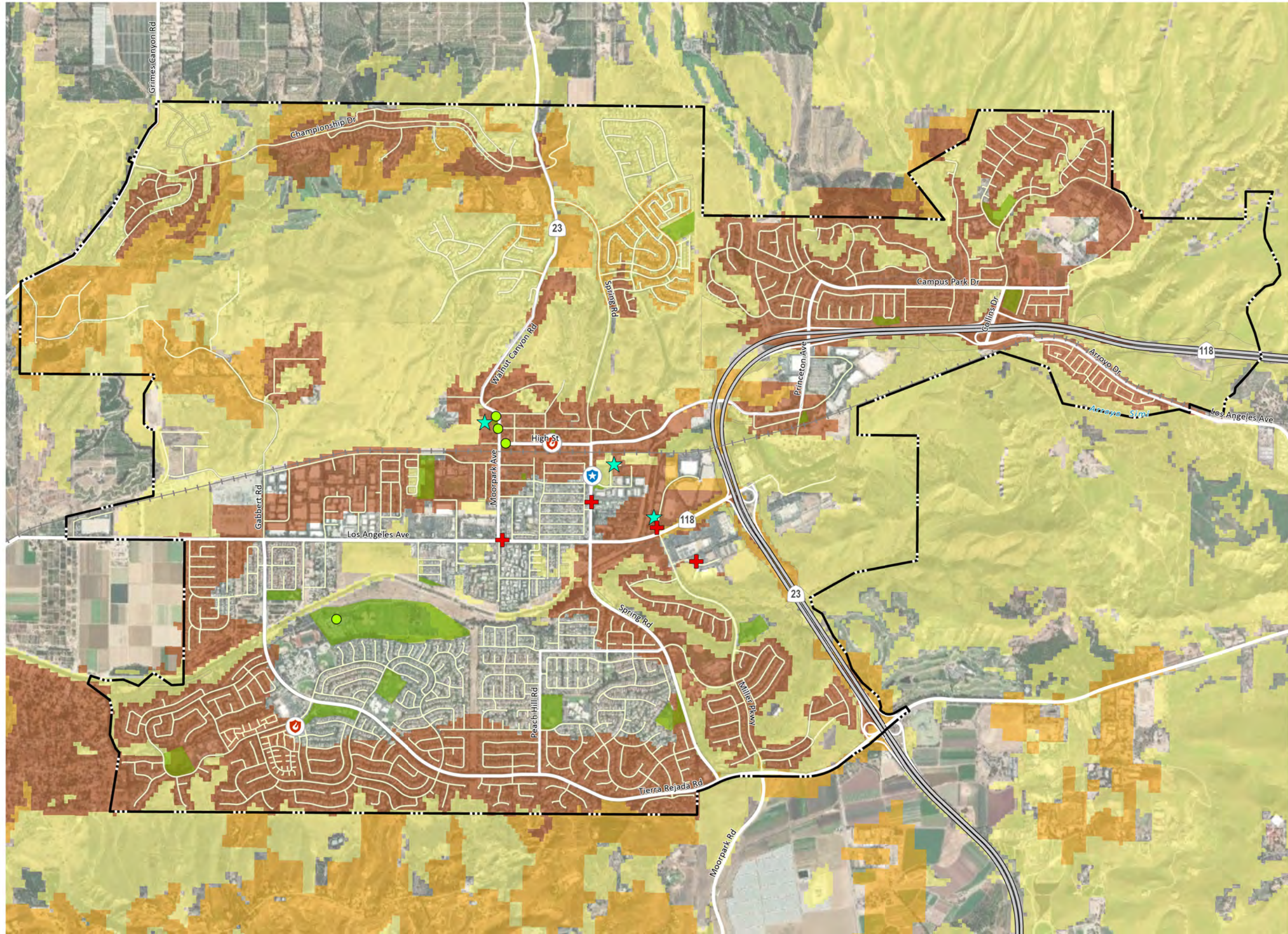
- City Boundary
- Very High Fire Hazard Severity Zone (LRA)
- Very High Fire Hazard Severity Zone (SRA)
- High Fire Hazard Severity Zone (SRA)
- Moderate Fire Hazard Severity Zone (SRA)
- Critical Facilities**
- Police Services Center
- Fire Station
- Community Facility
- Government Facility
- Medical
- School/College Campuses
- Parks



Draft Environmental Impact Report



Source: CalFire, 2020; PlaceWorks, 2022 Date: 2/24/2023



Wildfire
 Figure 5.20-2
 Wildland Urban Interface

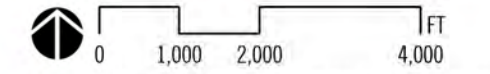
- City Boundary
- Police Services Center
- Fire Station
- Community Facility
- Government Facility
- Medical
- Parks

CalFire Wildland/Urban Interface

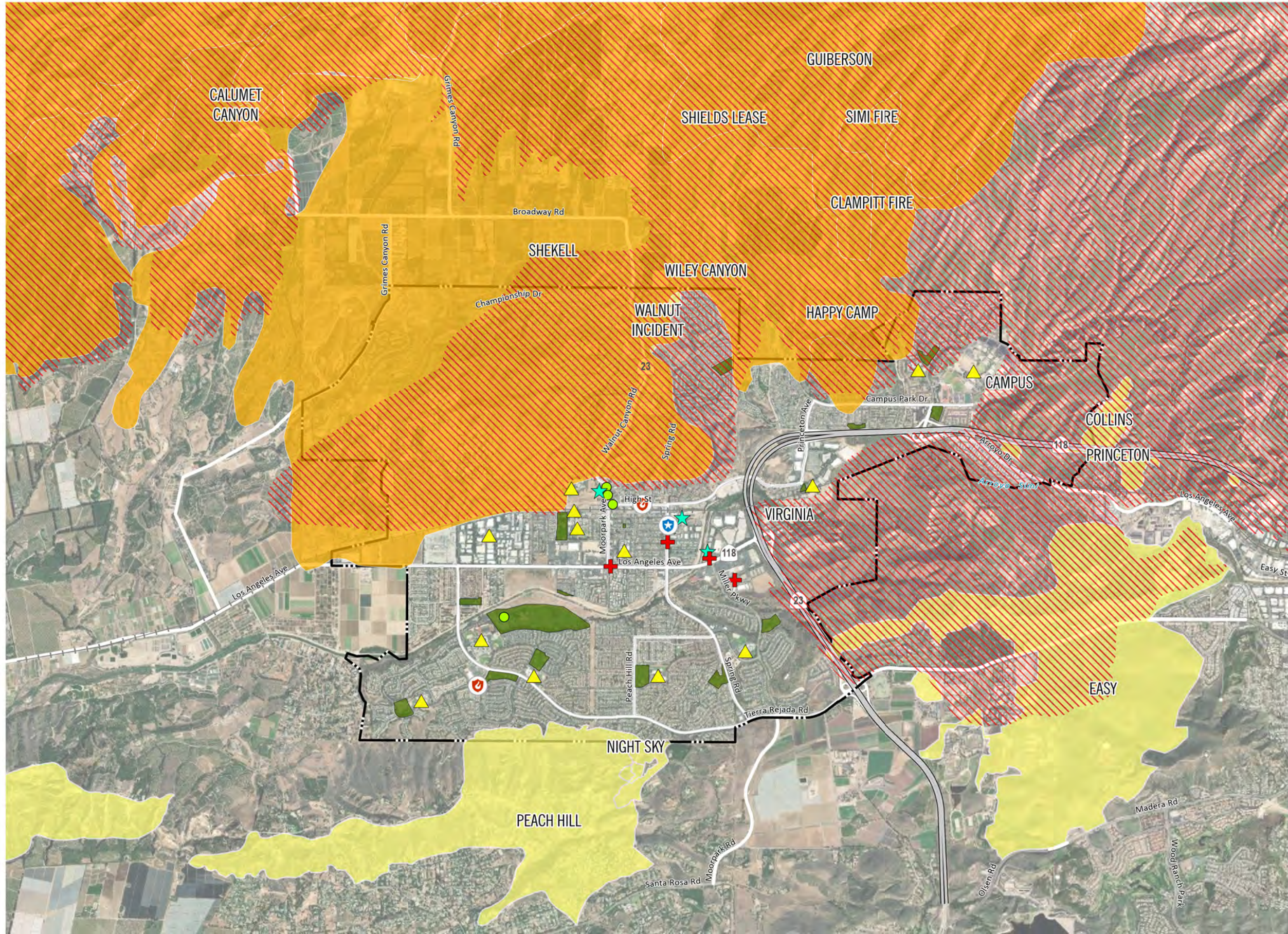
- Influence Zone: Wildfire-susceptible vegetation within 1.5 miles from the interface or intermix zones.
- Intermix Zone: Housing development or improved parcels interspersed in an area dominated by wildland vegetation subject to wildfire.
- Interface Zone: Dense housing next to vegetation, but not dominated by wildland vegetation, that can burn in a wildfire.



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Source: CalFire, 2020; PlaceWorks, 2022 Date: 2/24/2023

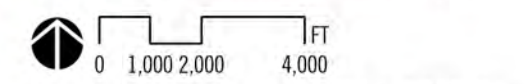


Wildfire
 Figure 5.20-3
 Historic Fires within or near
 Moorpark by Acres Burned

- City Boundary
- Historic Fire Perimeter
- Acres**
- < 10,000 Acres
- 10,000 - 20,000 Acres
- 20,000 + Acres
- Critical Facilities**
- Police Services Center
- Fire Station
- Community Facility
- Government Facility
- Medical
- School/College Campuses
- Parks



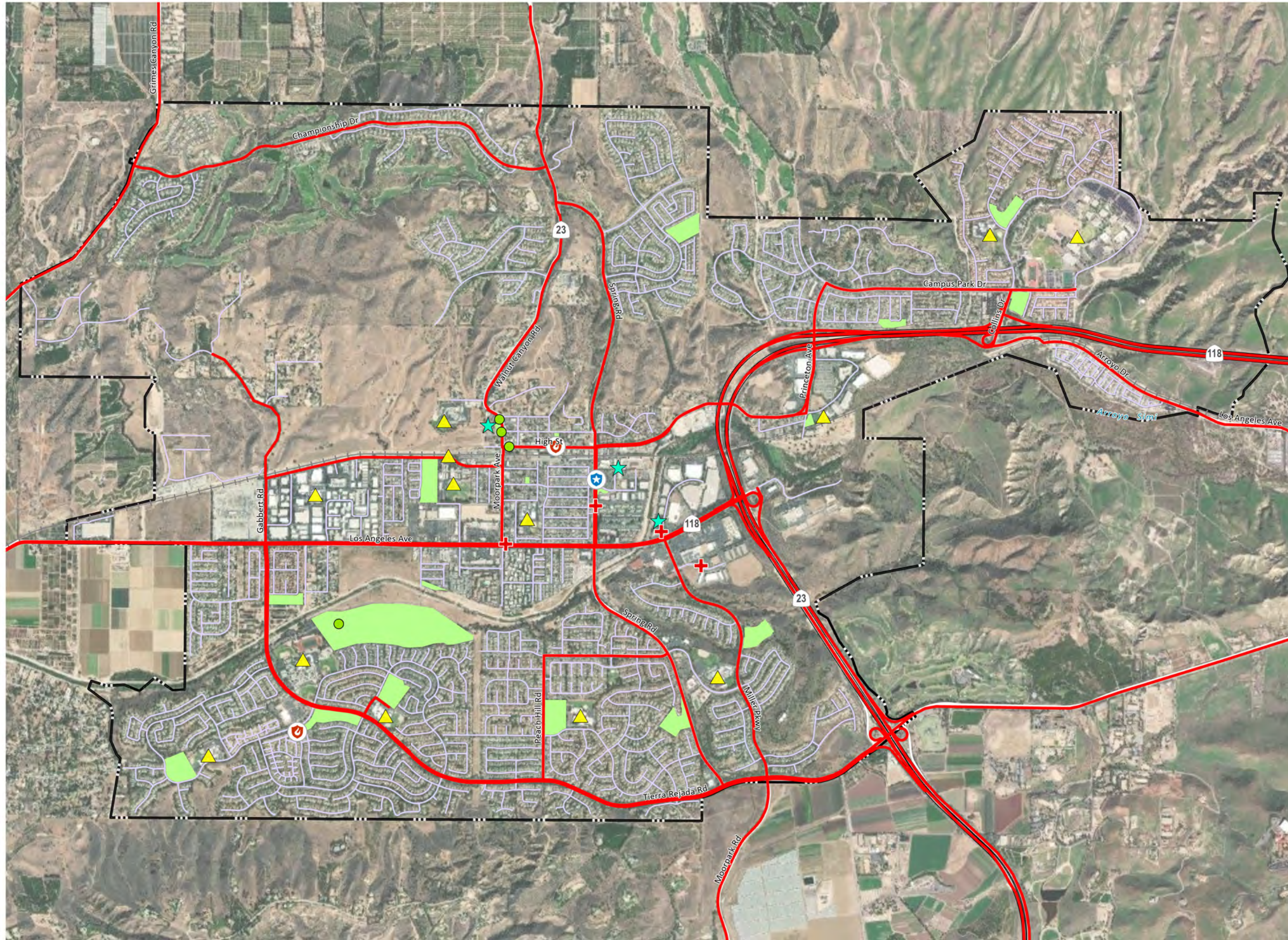
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










Source: CalFire, 2020; PlaceWorks, 2022 Date: 2/24/2023

Wildfire

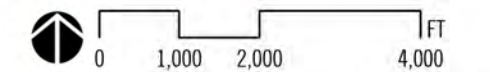
Figure 5.20-4
Evacuation Routes



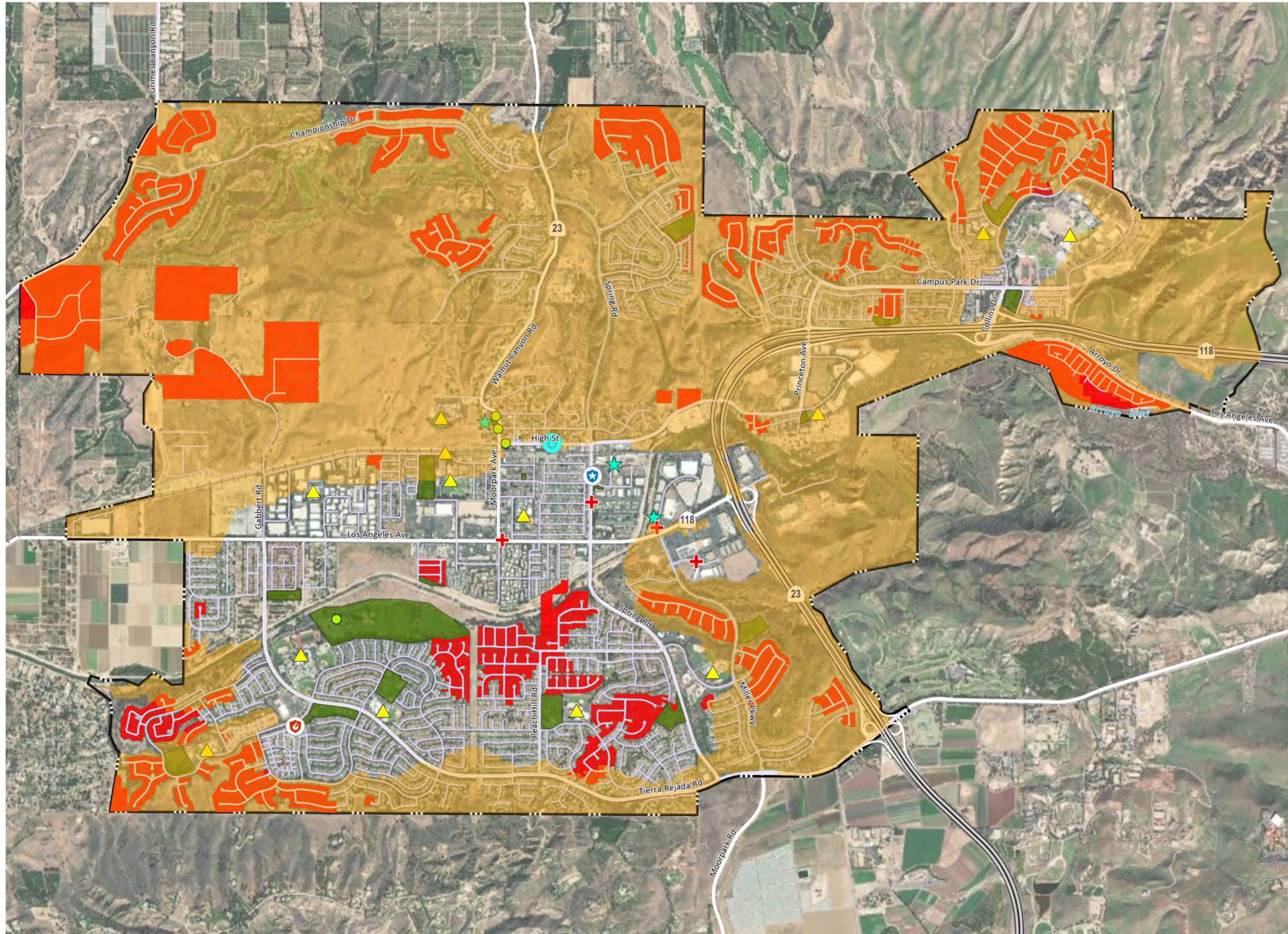
-  City Boundary
-  Evacuation Routes
-  Police Services Center
-  Fire Station
-  Community Facility
-  Government Facility
-  Medical
-  School/College Campuses
-  Parks



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









Source: City of Moorpark, 2022; PlaceWorks, 2022 Date: 2/27/2023



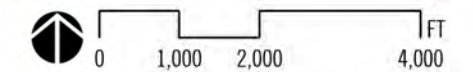
Wildfire

Figure 5.20-5
Evacuation Constrained
Residential Parcels

-  City Boundary
-  Very High Fire Hazard Severity Zone (LRA)
-  Residential Parcels with Evacuation Constraints
- Critical Facilities**
-  Police Services Center
-  Fire Station
-  Community Facility
-  Government Facility
-  Medical
-  School/College Campuses
-  Parks



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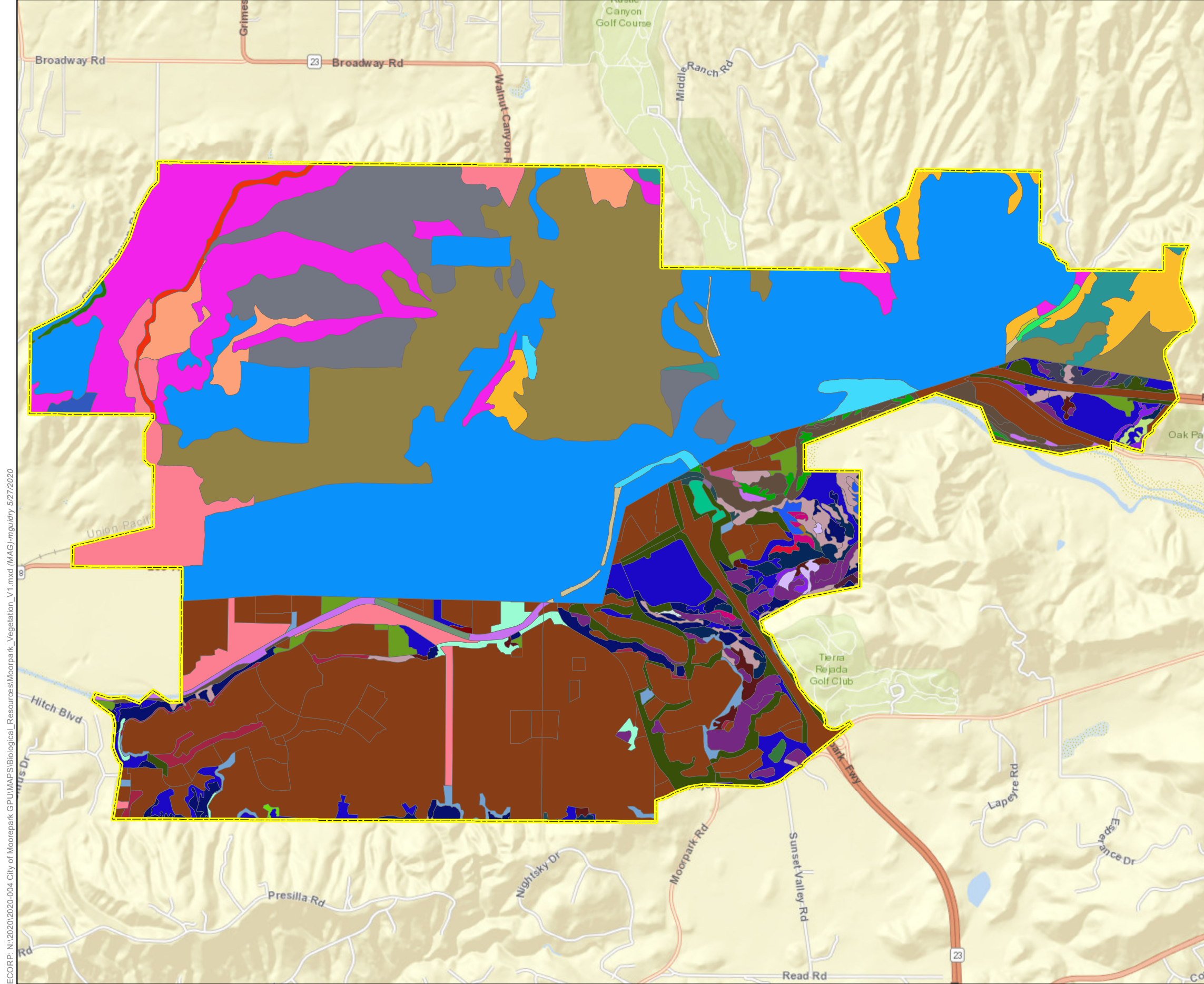


Source: City of Moorpark, 2022; PlaceWorks, 2022; ESRI, 2022 Date: 2/24/2023

Appendix B Vegetation Mapping Exhibit

Appendix

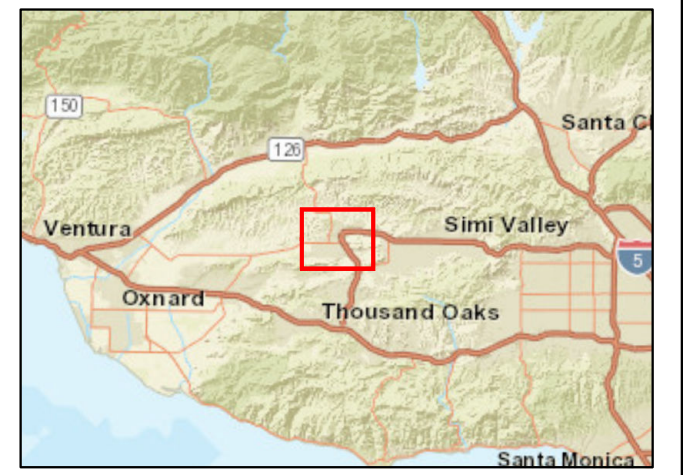
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Map Features

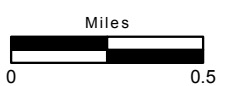
City Limits	Native and Non-Native Herbaceous Superalliance Mapping Unit
IVC_Allian	Opuntia littoralis Alliance
Adenostoma fasciculatum	Opuntia spp.
Adenostoma fasciculatum-Salvia mellifera	Platanus racemosa
Agriculture	Platanus racemosa Alliance
Artemisia californica	Post Fire or Post Clearing Regeneration Unidentifiable Shrubs
Artemisia californica-Eriogonum fasciculatum	Predominantly Shrubs/Herbaceous on Artificial Cuts/Embankments
Artemisia californica-Salvia leucophylla	Quercus agrifolia
Artemisia californica-Salvia mellifera	Quercus agrifolia Alliance
Arundo donax	Rhus integrifolia
Baccharis pilularis	Riverine, Lacustrine, and Tidal Mudflat Mapping Unit
Baccharis pilularis Alliance	Rock outcrop Mapping Unit
Baccharis salicifolia	Salix laevigata-Salix lasiolepis Superalliance Mapping Unit
Baccharis salicifolia Alliance	Salix lasiolepis Alliance
Cleared Land	Salvia leucophylla
Developed	Salvia leucophylla Alliance
Encelia californica	Salvia mellifera
Eriogonum fasciculatum	Salvia mellifera-Salvia leucophylla Alliance
Eucalyptus	Schinus molle (Pepper)
Exotic Trees Undifferentiated	Streambed
Lepidospartum squamatum Alliance	Unknown Riparian
Lotus scoparius	Urban - Herbaceous/Cleared
Malosma laurina	Urban - Shrub
Malosma laurina Alliance	Urban/Disturbed or Built-Up
Nassella pulchra Alliance	Water

Source: Ventura County, Esri



ECORP: N:\2020\2020-004_City of Moorepark GPU\MAPS\Biological_Resources\Moorpark_Vegetation_V1.mxd (MAG:mguidry 5/27/2020)

Map Date: 5/27/2020



DRAFT

Figure X. Vegetation Mapping

2020-004 City of Moorepark GPU

