



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](http://www.wildlife.ca.gov)

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



Governor's Office of Planning & Research

July 25, 2022

**JUL 25 2022**

## STATE CLEARINGHOUSE

Mr. Jordan Switzer  
Casitas Municipal Water District  
1055 Ventura Avenue  
Oak View, CA 93022  
[JSwitzer@casitaswater.com](mailto:JSwitzer@casitaswater.com)

**Subject: Copper to Control Algae and Aquatic Animal Invasive Species in Lake Casitas, Mitigated Negative Declaration, SCH No. 2022060526; City of Oak View, Ventura County**

Dear Mr. Switzer:

The California Department of Fish and Wildlife (CDFW) has reviewed the Casitas Municipal Water District's (District) Mitigated Negative Declaration (MND) for the Use of Copper to Control Algae and Aquatic Animal Invasive Species (Project). The District, as Lead Agency, prepared a MND pursuant to the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 et. seq.) with the purpose of informing decision-makers and the public regarding potential environmental effects related to the Project. Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife or be subject to Fish and Game Code.

### CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust for the people of the state [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, [§ 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). CDFW is also directed to provide biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 et seq.). To the extent implementation of the Project as proposed may result in "take" of any species protected under the California Endangered Species Act (CESA; Fish & Game Code, § 2050 et seq.), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

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## Project Description and Summary

**Objective:** The District has proposed the use of algaecides (Cutrine Plus) and molluscicides (EarthTecQZ) within Lake Casitas. These compounds will be used on an as-needed basis and will not be used concurrently. Algaecide treatments will be applied at a 1mg/L and will not be applied again within 14 days of the initial treatment. Molluscicide treatments will be applied at 0.19 mg/L and will not be reapplied within 8 days of the initial treatment.

**Location:** Lake Casitas is a man-made freshwater reservoir located in an unincorporated portion of Ventura County. The reservoir is fed by Coyote Creek and water is also diverted from the Ventura River via the Robles Diversion (USBR 2022).

## Comments and Recommendations

CDFW offers the comments and recommendations below to assist the District in adequately identifying, avoiding, and/or mitigating significant, or potentially significant, direct and indirect impacts on fish and wildlife biological resources based on the planned activities of this proposed Project. CDFW recommends the measures below be included in a science-based monitoring program with adaptive management strategies as part of the Project's CEQA mitigation, monitoring, and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097). Additional comments or other suggestions may also be included to improve the document.

### Specific Comments

#### Comment #1: Impacts from molluscicides to non-target species

**Issue:** Molluscicides will eradicate non-target mollusk species within Lake Casitas.

**Specific Impact:** Non-target freshwater-mollusk species exist in Lake Casitas. These species may serve as an important resource to aquatic life and self-sustaining fish populations within the reservoir. Although, fish species present support angling and recreational activities at Lake Casitas. Reduction of resources could result in impacts to sport fishing opportunities.

**Why Impact Would Occur:** Lake Casitas is a freshwater reservoir which provides angling and boating recreational opportunities. Fish species within the lake include: largemouth bass (*Micropterus salmoides*), channel catfish (*Ictalurus punctatus*), bluegill (*Lepomis macrochirus*), redear sunfish (*Lepomis microlophus*), common carp (*Cyprinus carpio*), white crappie (*Pomoxis annularis*), and black crappie (*Pomoxis nigromaculatus*). CDFW also stocks the lake with hatchery rainbow trout on an annual to semi-annual basis (CDFW 2022). Several of these species such as redear sunfish and catfish utilize nonnative Asian clams (*Corbicula fluminea*) as a food resource. Use of molluscicides may result in the die-off of Asian clams, a non-target species (NPIC 2012). Loss of food resources will have a detrimental effect on self-sustaining fish species within Lake Casitas thereby impacting recreational fishery. Because Lake Casitas has an extremely strict invasive dreissenids program, CDFW considers preventative use of molluscicides unnecessary.

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**Evidence Impact Would Be Significant:** The Project may substantially adversely affect existing aquatic communities. Molluscicides could be hazardous or deleterious to aquatic life and non-target species and wildlife.

### **Recommended potentially feasible mitigation measure(s)**

**Mitigation Measure #1:** To circumvent any unnecessary impacts to aquatic systems and recreational fishery in Lake Casitas CDFW recommends avoiding the use of molluscicides as a preventative measure. CDFW recommends only using these compounds if presence of invasive dreissenids is confirmed.

**Mitigation Measure #2:** If avoidance is not possible CDFW recommends increased stocking of hatchery fish to alleviate recreational impacts in Lake Casitas.

### **Additional Recommendations**

Impacts to Birds. CDFW recommends the Applicant assess impacts to bird species due to ingestion and bioaccumulation. Several piscivorous species and birds of prey have potential to occur at Lake Casitas and may be impacted by the application algaecides and molluscicides.


### **Filing Fees**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the County and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

### **Conclusion**

We appreciate the opportunity to comment on the Project to assist the 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](mailto:Angela.Castanon@wildlife.ca.gov).

Sincerely,

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

Mr. Jordan Switzer  
Casitas Municipal Water District  
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ec: CDFW  
Steve Gibson, Los Alamitos – [Steve.Gibson@wildlife.ca.gov](mailto:Steve.Gibson@wildlife.ca.gov)  
Emily Galli, Fillmore – [Emily.Galli@wildlife.ca.gov](mailto:Emily.Galli@wildlife.ca.gov)  
Cindy Hailey, San Diego – [Cindy.Hailey@wildlife.ca.gov](mailto:Cindy.Hailey@wildlife.ca.gov)  
CEQA Program Coordinator, Sacramento – [CEQACommentLetters@wildlife.ca.gov](mailto:CEQACommentLetters@wildlife.ca.gov)

Office of Planning and Research  
State Clearinghouse, Sacramento – [State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

**References:**

[CDFW] California Department of Fish and Wildlife. 2022. Fish Planting Schedule. Available from: <https://nrm.dfg.ca.gov/FishPlants/Default.aspx?county=Ventura&time=All>

[NPIC] National Pesticide Information Center. 2012. Copper Sulfate Technical Fact Sheet. Available from: <http://npic.orst.edu/factsheets/archive/cuso4tech.html>

[USBR] U.S. Bureau of Reclamation. 2022. Casitas Dam. Available from: <https://www.usbr.gov/projects/index.php?id=276>



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### Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP should reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

<b>Biological Resources (BIO)</b>			
<b>Mitigation Measure (MM) or Recommendation (REC)</b>		<b>Timing</b>	<b>Responsible Party</b>
<b>MM-BIO-1- Molluscicides</b>	To circumvent any unnecessary impacts to aquatic systems and recreational fishery in Lake Casitas CDFW recommends avoiding the use of molluscicides as a preventative measure. CDFW recommends only using these compounds if presence of invasive dreissenids is confirmed.	Prior to Project activities	Casitas Municipal Water District/ Applicant
<b>MM-BIO-2- Molluscicides</b>	If avoidance is not possible CDFW recommends increased stocking of hatchery to alleviate recreational impacts in Lake Casitas.	Prior to/During/ After Project activities	Casitas Municipal Water District/ Applicant
<b>REC-1- Impacts to Birds</b>	CDFW recommends the Applicant assess impacts to bird species due to ingestion and bioaccumulation. Several piscivorous species and birds of prey have potential to occur at Lake Casitas.	Prior to construction and activities	Casitas Municipal Water District/ Applicant