



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

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Governor's Office of Planning & Research

Aug 17 2022**STATE CLEARINGHOUSE**

August 17, 2022

Ms. Shanna Farley
City of Moorpark
799 Moorpark Avenue
Moorpark, CA 93021
SFarley@moorparkca.gov

**Subject: Pentair Warehouse Expansion Project, Mitigated Negative Declaration,
SCH No. 2022070289; City of Moorpark, Ventura County**

Dear Ms. Farley:

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

CDFW's Role

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

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

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Project Description and Summary

Objective: The proposed Project will expand on the Pentair pool supplies warehouse directly to the west of the Project site. The Project includes the following activities:

Structures and Amenities

The Project as proposed will include the construction of a 90,566 square foot industrial building. The site will also include 21 truck-loading spaces, 179 parking stalls, and an underground storm drain chamber. A secondary emergency exit access bridge will also be constructed along Los Angeles Avenue and span over the Gabbert Canyon Channel. The portion of the channel which is proposed for the driveway will be replaced by a concrete box culvert. The bridge will be 35 feet wide.

Exterior Lighting

Eight light poles will be placed throughout the parking lot and eighteen wall pack light poles will be placed adjacent to the building. Light-emitting diodes (LEDs) will be used for the project.

Grading and Construction

Project activities include site preparation, paving, grading, excavation, compaction and building construction. Approximately 11,307 cubic yards of cut and fill will be used for this Project, offsite fill will not be needed. All equipment will be staged within the Project site and construction vehicles and heavy equipment will be used on site. Construction activities of the Proposed Project will be scheduled in compliance with the City's Municipal Code Title 17.

Landscape Improvements

Landscaping is anticipated to comprise 16.9% of the total project area. Landscaping will include drought-tolerant plants, trees, shrubs, and groundcovers. Landscaped areas will be irrigated with an automatic irrigation system.

Location: The Project site is in the City of Moorpark directly to the east of the Pentair warehouse. The site is surrounded by industrial and agricultural land uses. The Gabbert Canyon channel is to the south of the site.

Comments and Recommendations

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 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.

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Specific Comments

Comment #1: Impacts to Aquatic and Riparian Resources, Lake and Streambed Alteration Agreement (LSA)

Issue: The Project may result in direct or indirect impacts to the Gabbert Canyon channel and Arroyo Simi creek. It is also unclear if the feature which cuts diagonally through the site provides a hydrologic function.

Specific Impacts: The Project has a stream along its southern border. The Gabbert Canyon channel, a concrete-lined channel which drains into Arroyo Simi creek abuts the project site. The proposed Project may diminish onsite and downstream water quality, alter the hydrologic and geomorphic processes, and impact specially listed downstream species.

Why impacts would occur: Within the MND it states, "A total of 0.02 acre of permanent impacts to waters of the State will occur as a result of the Project; thus, a State 401 certification and/or CDFW State Streambed Alteration Agreement may be required for Project authorization." CDFW concurs with the Project's statement to notify CDFW pursuant to Fish and Game Code, section 1600 *et seq.* Project implementation includes grading, excavating, material staging, grubbing, and vegetation clearing. 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, wildlife, or riparian habitat resulting from Project related activities may enter the stream.

Further, it is unclear whether stream delineation surveys have been conducted onsite, a feature which appears to have some hydrological function is present cutting diagonally through the Project site. When referenced on Google Earth the feature has been devoid of vegetation for years, suggesting water may flow along the surface sporadically. CDFW would like confirmation on whether this feature does or does not fall within State jurisdiction. Stream delineation surveys should evaluate all rivers and streams, including culverts, ditches, storm channels that may transport water, sediment, and pollutants and discharge into rivers and streams.

Evidence Impact Would Be Significant: 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. The Project may adversely affect the existing hydrology pattern of the Project site as well as downstream. This may occur through the alteration of flows to streams. In addition, impacts to biological resources offsite, may occur. The Project may substantially adversely affect the existing stormwater flows into streams through the alteration of drainages on site. It is unclear if these stormwater diversions would impact biological resources offsite because an investigation has not been made to determine so. Inadequate investigation may result in the Project continuing to have a substantial adverse direct 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.

Mitigation Measure #1: The Project applicant (or "entity") should provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification

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and other information, CDFW shall determine whether a 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>.

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

Comment #2: Timing of Surveys

Issue: It is unclear if the project will impact sensitive plants and/or sensitive plant communities. Focused botanical surveys were not conducted, and reconnaissance level surveys were done outside of regular bloom times.

Specific impact: Due to the lack of protocol surveys it is unclear if special-status plants and/or communities will be impacted by Project activities. Without protocol surveys the Project may result in a significant impact to special-status plants/communities. Development of the area and thinning of vegetation for fuel modification will result in the loss of resources.

Why impact would occur: A reconnaissance level survey was done within the Project footprint in 2021, but was conducted in the month of December, outside of regular bloom times for plants in the geographical area. Further, only the project footprint was surveyed. CDFW recommends the Applicant survey the entirety of the lot to avoid direct and indirect impacts to specially listed plants and sensitive vegetation communities in the surrounding area. Absence was determined based only on literature and a review of the California Natural Diversity Database (CNDDDB). Presence/absence determinations of rare plants in the Project area, specifically areas that would be impacted due to Project implementation, should be determined based on recent surveys.

Evidence impact would be significant: Impacts to special-status plant species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to these sensitive plant species will result in a Project(s) continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS).

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Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends surveying the project footprint and the remaining acreage of the lot to produce a plant communities map. Vegetation surveys should be conducted following systematic field techniques outlined by CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018). The amount of time and level of effort for a given should be determined based on the vegetation and its overall diversity and structural complexity (CDFW 2018). For example, one person-hour per eight acres per survey date is needed for a comprehensive field survey in grassland with medium diversity and moderate terrain, with additional time allocated for species identification (CDFW 2018). Additionally, considerations should be made regarding timing of these field surveys to ensure accuracy in determining what plants exist on site.

To determine the rarity ranking of vegetation communities on a specific Project site(s), CDFW utilizes vegetation descriptions found in the *Manual of California Vegetation* (MCV). The MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system (found online at <http://vegetation.cnps.org/>). CDFW recommends the environmental document provide measures to fully mitigate the loss of individual Endangered Species Act (ESA)- and CESA-listed plants and habitat.

1. The MND should provide a 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).
2. The MND should provide species-specific measures for on-site mitigation. Each species-specific mitigation plan should adopt an ecosystem-based approach and be of sufficient detail and resolution to describe the following at a minimum: 1) identify the impact and level of impact (e.g., acres or individual plants/habitat impacted); 2) location of on-site mitigation and adequacy of the location(s) to serve as mitigation; 3) assessment of appropriate reference sites; 4) scientific [genus and species (subspecies/variety if applicable)] of plants being used for restoration; 5) location(s) of propagule source; 6) species-specific planting methods (i.e., container or seed); 7) measurable goals and success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover); 8) long-term monitoring, and; 9) adaptive management techniques.

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

Mitigation Measure #3: If rare or sensitive plants/communities are impacted on or near the footprint of the Project, CDFW recommends the MND provide measures to fully mitigate the loss

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of individual ESA- and CESA-listed plants and habitat. The Project proponent should mitigate at a ratio sufficient to achieve a no-net loss for impacts to special status plant species and their associated habitat. This should be for the number of plants replaced to number impacted, including acres of habitat created to acres of habitat impacted.

Comment #3: Impacts to Non-Game Mammals and Wildlife

Issue: Wildlife may still move through the Project site during the daytime or nighttime. CDFW is concerned that any wildlife potentially moving through or seeking temporary refuge on the Project site may be directly impacted during Project activities and construction. Any final fence, or other design features, design should allow for wildlife movement.

Specific impacts: Project activities and construction equipment may directly impact wildlife and birds moving through or seeking temporary refuge on site. This could result in wildlife and bird mortality. Furthermore, depending on the final fencing design, the Project may cumulatively restrict wildlife movement opportunity.

Why impacts would occur: Direct impacts to wildlife may occur from: ground disturbing activities (e.g., staging, access, excavation, grading); wildlife being trapped or entangled in construction materials and erection of restrictive fencing; and wildlife could be trampled by heavy equipment operating in the Project site.

Evidence impact would be significant: Mammals occurring naturally in California are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & Game Code, § 4150; Cal. Code of Regs, § 251.1).

Recommended Potentially Feasible Mitigation Measure(s): CDFW recommends the following four mitigation measures to avoid and minimize direct impacts to wildlife during Project construction and activities.

Mitigation Measure #1: If fencing is proposed for use during construction or during the life of the Project, fences should be constructed with materials that are not harmful to wildlife. Prohibited materials include, but are not limited to, spikes, glass, razor, or barbed wire. Fencing should also be minimized so as not to restrict free wildlife movement through habitat areas. CDFW recommends the City consider permeable fencing as part of its mitigation for Project-related impacts. Wildlife impermeable fencing is fencing that prevents or creates a barrier for the passage of wildlife from one side to the other. Los Angeles County's Significant Ecological Areas Ordinance Implementation Guide (<https://planning.lacounty.gov/site/sea/wp-content/uploads/2020/02/SEA-IG-2-6-20.pdf>) offers additional information on permeable fencing as well as design standards. CDFW recommends reviewing those design standards.

Mitigation Measure #2: To avoid direct mortality, a qualified biological monitor should be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. Salvaged wildlife of low mobility should be removed and placed onto adjacent and suitable (i.e., species appropriate) habitat out of harm's way.

It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Program impacts associated with habitat loss.

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Mitigation Measure #3: Grubbing and grading should be done to avoid islands of habitat where wildlife may take refuge and later be killed by heavy equipment. Grubbing and grading should be done from the center of the Project site, working outward towards adjacent habitat off site where wildlife may safely escape.

Additional Recommendations

Out of Harm's Way. CDFW recommends a qualified biologist is on site during all ground disturbing activities to salvage any reptiles or fossorial species.

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

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

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 & Game Code, § 711.4; Pub. Resources Code, § 21089).

Conclusion

We appreciate the opportunity to comment on the Project to assist the City in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City 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

Sincerely,

DocuSigned by:

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Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

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ec: CDFW
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References:

[CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available from: <https://nrm.dfg.ca.gov>
Hinshaw, J.M., Holmstead, G.L., Cypher, B.L., Anderson D.C. 1998. Effects of Simulated Field Disturbance and Topsoil Salvage on *Eriogonum Hooveri*. Accessed from: <http://www.jstor.org/stable/41425279>



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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.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-1-LSA	<p>The Project applicant (or “entity”) 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 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.</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>Prior to Project construction and activities</p>	<p>City of Moorpark/ Applicant</p>

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<p>MM-BIO-2-LSA</p>	<p>Any LSA Agreement issued for the Project 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.</p>	<p>Prior to/ During Project construction and activities</p>	<p>City of Moorpark/ Applicant</p>
<p>MM-BIO-3- Impacts to Special Status Plants and Communities</p>	<p>CDFW recommends surveying the project footprint and the remaining acreage of the lot to produce a plant communities map. Vegetation surveys should be conducted following systematic field techniques outlined by CDFW's <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities</i> (CDFW 2018). The amount of time and level of effort for a given should be determined based on the vegetation and its overall diversity and structural complexity (CDFW 2018). For example, one person-hour per eight acres per survey date is needed for a comprehensive field survey in grassland with medium diversity and moderate terrain, with additional time allocated for species identification (CDFW 2018). Additionally, considerations should be made regarding timing of these field surveys to ensure accuracy in determining what plants exist on site.</p> <p>To determine the rarity ranking of vegetation communities on a specific Project site(s), CDFW utilizes vegetation descriptions found in the <i>Manual of California Vegetation</i> (MCV). The MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system (found online at http://vegetation.cnps.org/). CDFW recommends the environmental document provide measures to fully mitigate the loss of individual ESA- and CESA-listed plants and habitat.</p>	<p>Prior to Project construction and activities</p>	<p>City of Moorpark/ Applicant</p>

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	<ol style="list-style-type: none"> 1. The MND 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). 2. The MND should provide species-specific measures for on-site mitigation. Each species-specific mitigation plan should adopt an ecosystem-based approach and be of sufficient detail and resolution to describe the following at a minimum: 1) identify the impact and level of impact (e.g., acres or individual plants/habitat impacted); 2) location of on-site mitigation and adequacy of the location(s) to serve as mitigation; 3) assessment of appropriate reference sites; 4) scientific [genus and species (subspecies/variety if applicable)] of plants being used for restoration; 5) location(s) of propagule source; 6) species-specific planting methods (i.e., container or seed); 7) measurable goals and success criteria for establishing self-sustaining populations (e.g., percent survival rate, absolute cover); 8) long-term monitoring, and; 9) adaptive management techniques. 		
<p>MM-BIO-4- Impacts to Special Status Plants and Communities</p>	<p>If rare or sensitive plants are found on or near the footprint of the Project, the MND should provide species-specific measures to fully avoid impacts to all ESA- and CESA-listed plants. This may include flagging all plants and/or perimeter of populations; no work buffers around plants and/or populations (e.g., flagged perimeter plus 50 feet); restrictions on ground disturbing activities within protected areas; relocation of staging and other material</p>	<p>Prior to Project construction and activities</p>	<p>City of Moorpark/ Applicant</p>

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	piling areas away from protected areas; restrictions on herbicide use and/or type of herbicide and/or application method within 100 feet of sensitive plants; and worker education and training.		
MM-BIO-5- Impacts to Special Status Plants and Communities	If rare or sensitive plants/communities are impacted on or near the footprint of the Project, CDFW recommends the MND provide measures to fully mitigate the loss of individual ESA- and CESA-listed plants and habitat. The Project proponent should mitigate at a ratio sufficient to achieve a no-net loss for impacts to special status plant species and their associated habitat. This should be for the number of plants replaced to number impacted, including acres of habitat created to acres of habitat impacted.	Prior to Project construction and activities	City of Moorpark/ Applicant
MM-BIO-6- Impacts to Non-Game Mammals and Wildlife	If fencing is proposed for use during construction or during the life of the Project, fences should be constructed with materials that are not harmful to wildlife. Prohibited materials include, but are not limited to, spikes, glass, razor, or barbed wire. Fencing should also be minimized so as not to restrict free wildlife movement through habitat areas. Los Angeles County's Significant Ecological Areas Ordinance Implementation Guide (https://planning.lacounty.gov/site/sea/wp-content/uploads/2020/02/SEA-IG-2-6-20.pdf) offers additional information on permeable fencing as well as design standards. CDFW recommends reviewing those design standards.	Prior to/During Project construction and activities	City of Moorpark/ Applicant
MM-BIO-7- Impacts to Non-Game Mammals and Wildlife	To avoid direct mortality, a qualified biological monitor should be on site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project-related construction activities. Salvaged wildlife of low mobility should be removed and placed onto adjacent and suitable (i.e., species appropriate) habitat out of harm's way. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Program impacts associated with habitat loss.	During Project construction and activities	City of Moorpark/ Applicant

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MM-BIO-8- Impacts to Non- Game Mammals and Wildlife	Grubbing and grading should be done to avoid islands of habitat where wildlife may take refuge and later be killed by heavy equipment. Grubbing and grading should be done from the center of the Project site, working outward towards adjacent habitat off site where wildlife may safely escape.	During Project construction and activities	City of Moorpark/ Applicant
REC-1- Out of Harm's Way	CDFW recommends a qualified biologist is on site during all ground disturbing activities to salvage any reptiles or fossorial species.	Prior to/ During construction and activities	City of Moorpark/ Applicant
REC-2- Fuel Modification	If the Project includes fuel modification, CDFW recommends that the final environmental include avoidance and mitigation measures for any fuel modification activities conducted within and adjacent to the Project area. A weed management plan should be developed for all areas adjacent to open space that will be subject to fuel modification disturbance. CDFW also recommends that any irrigation proposed in fuel modification zones drain back into the development and not onto natural habitat land as perennial sources of water allow for the introduction of invasive Argentine ants.	Prior to/ During construction and activities	City of Moorpark/ Applicant
REC-3- MMRP	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.	Prior to Project construction and activities	City of Moorpark/ Applicant