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

March 23, 2023

Ms. Jennifer Lancaster
Calleguas Municipal Water District
2100 Olsen Road
Thousand Oaks, CA 91362
JLancaster@calleguas.com

Subject: Calleguas Regional Salinity Management Pipeline Phase 3 and 4, Notice of Preparation, SCH No. 2023020421; Cities of Camarillo, Moorpark, Simi Valley, and Thousand Oaks; Ventura County

Dear Ms. Lancaster:

The California Department of Fish and Wildlife (CDFW) has reviewed the Calleguas Municipal Water District's (District; Lead Agency) Notice of Preparation (NOP) for a subsequent Draft Environmental Impact Report (DEIR) for the Calleguas Regional Salinity Management Pipeline Phase 3 and 4 (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. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public 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). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, 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*.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, 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.

Project Description and Summary

Objective: The Project aims to address the high salinity of water within the Calleguas watershed by adding another branch to an existing effluent pipeline. The pipeline will be largely placed by traditional trenching methods except when crossing waterways where trenchless methods would be employed. The additional pipeline would transport additional recycled water and brine to the current ocean outfall off Port Hueneme. The proposed pipeline would be built in two phases, Phase 3 and Phase 4. Phase 3 of the Project will initiate at the eastern end of existing Calleguas River Salinity Management Pipeline (CRSMP) in the City of Camarillo, on the west side of Somis Road. Phase 3 would extend 5.1 miles, mostly along public Right of Way (ROW) and terminate along Santa Rosa Road in unincorporated Ventura County. Phase 3 is anticipated to take 16 months. Phase 4 will extend from the end of Phase 3 and follow several roadways into Moorpark and eventually into Simi Valley. Phase 4 is anticipated to take 30 months. Three potential dischargers are included within the Project and are currently existing, planned for development, or under consideration. These dischargers will be in close proximity to the pipeline alignment.

The alignment mostly follows roadways but a portion cuts across the width of the Tierra Rejada critical wildlife passage and the Santa Monica-Sierra Madre wildlife corridor. The pipeline would also pass designated critical habitat for several special status species. The pipeline would cross several waterways. Although the alignment largely follows ROWs, it was noted that mature trees are present along some of these roadways that may be impacted.

Location: Phase 3 of the alignment will begin at the existing CRSMP pipeline near the intersection of Las Posas Road and Upland Road and travel east on Santa Rosa Road into unincorporated Ventura County. The alignment will continue north onto Moorpark Road, east onto Read Road, and north onto Sunset Valley Road. The alignment will briefly travel north-east into Moorpark along Tierra Reijada Road and continue eastward into unincorporated Ventura County. The pipeline will terminate on Tierra Rejada Road within Simi Valley just before the intersection with Madera Road. Surrounding land uses include residential, agricultural, open spaces, and commercial.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the District in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources.

COMMENTS AND RECOMMENDATIONS

Specific Comments – Marine

1) Impacts to Marine Resources. The CRSMP has an existing National Pollutant Discharge Elimination System permit (NDPES CA0064521) for ocean outfall discharges via the Hueneme Outfall, located in the vicinity of Port Hueneme Beach, into the Pacific Ocean. The waters in this area support many resident and migratory fish, important marine plants such as eelgrass (*Zostera marina*), and special status wildlife such as seabirds, marine mammals, and sea turtles. Additionally, the waters also support commercially and recreationally important fish and invertebrate species such as California halibut (*Paralichthys californicus*),

California spiny lobster (*Panulirus interruptus*), and the important forage fish Northern anchovy (*Engraulis mordax*). Brine disposal through the outfall may increase salinity at and around the discharge point and could also release contaminants into the marine environment. CDFW recommends that the Biological Resources section of the DEIR include an assessment on the potential impacts to marine life as a result of the ocean outfall discharge. The DEIR should also discuss potential changes to the zone of initial dilution (ZID), salinity differences, potential changes to pollutant amounts, and other changes associated with the discharge.

Specific Comments – Terrestrial

1) Impacts on Wildlife Corridors and Habitat Connectivity. According to the Ventura County's GIS viewer, the following roads along the Project alignment are within the Santa Monica-Sierra Madre wildlife corridor: Read Road, Sunset Valley Road, and Tierra Rejada Road. Tierra Rejada Road is also within the Tierra Rejada critical wildlife passage and permeable essential connectivity areas (Ventura County 2023; CDFW 2023a; CDFW 2023b). Likewise, several wildlife crossing areas are present along these roadways (Ventura County 2023). Although the Project will follow established roads and be done incrementally, increased noise, vibration, light, and human activity may impede wildlife movement in areas of Project implementation. Increased activity may lead wildlife, including special status species, to less permeable areas and increase the likelihood of vehicle strikes.

    a. Analysis and Disclosure. CDFW recommends the Applicant analyze whether the Project would impact wildlife corridors and essential connectivity blocks within the entirety of the Project area. 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. Further, the DEIR should analyze the cumulative impacts of the Project within these important movement areas as part of their analysis. The Applicant should consider current, planned, and future Projects when analyzing Project impacts.

    b. Avoidance. To more effectively avoid and mitigate within passage areas the Applicant should at a minimum consider the following datasets on the Biographic Information and Observations System (BIOS): Essential Connectivity Areas (ds620) and Habitat Connectivity Ventura County (ds565) (CDFW 2023b & CDFW 2023a). Based on these datasets, the Applicant should identify areas of possible impact. Project implementation should not exacerbate existing barriers to wildlife movement. Project activities should be avoided during dusk and dawn when wildlife movement and foraging is more likely. Proper setbacks in corridors, passage areas, crossings, and essential connectivity areas should be established.

    c. Mitigation. CDFW recommends the Project avoid developing and encroaching onto wildlife corridors, essential connectivity blocks, critical wildlife passage areas, or potential linkage areas. If avoidance is not feasible, CDFW recommends the DEIR provide measures to minimize and mitigate for the Project's significant impacts on wildlife corridors (see General Comments 7 & 8). If impacts are anticipated to occur within movement areas, the Applicant should be required to construct a crossing or passage with wildlife fencing to maintain safe wildlife movement in the impacted area as

part of the Project. The DEIR should provide the dimensions and locations of potential crossings. If temporary or permanent impacts occur to habitat or sensitive natural communities within these movement areas, the Applicant may also consider acquiring contiguous adjacent land parcels to be protected in perpetuity from encroachment and development.

2) Sensitive Habitats and Open Space. The Project alignment passes by several sensitive habitat areas (critical habitat for coastal California gnatcatcher (*Polioptila californica californica*), Riverside fairy shrimp (*Streptocephalus woottoni)*, and Lyon's pentachaeta (*Lyon's pentachaeta*)) and open space areas. These areas offer nesting, breeding, and foraging habitat for species. Project activities abutting the sensitive habitats and open space could impact sensitive species due to increased noise, light, dust, vibrations, and human activity.

   a. Analysis and Disclosure. CDFW recommends the Applicant analyze and discuss the Project's direct and indirect impacts on sensitive habitats/open space within the Project area. Analysis should include but not be limited to:

      1. Direct impacts that could result in loss of sensitive habitats/open space due to development, grading, excavation, and fuel modifications.
      2. Indirect impacts that could result in habitat loss due to edge effects and introduction of non-native/invasive plants.
      3. The DEIR should disclose the acreage of sensitive habitats and open space that would be impacted/lost as a result of both direct and indirect impacts from the proposed Project.

   b. Avoidance. CDFW recommends the Project avoid developing and encroaching onto sensitive habitats/open space. Encroachment onto sensitive habitats/open space creates an abrupt transition between two different land uses. Encroachment onto sensitive habitats/open space could affect environmental and biological conditions and increase the magnitude of edge effects on biological resources. CDFW recommends the DEIR provide alternatives to the Project that would not result in the development of areas within close proximity of sensitive habitat or open space. CDFW also recommends the DEIR provide alternatives that would not encroach onto sensitive habitats/open space. Pursuant to CEQA Guidelines section 15126.6, a DEIR "shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasible attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives." Furthermore, a DEIR "shall include sufficient information about alternatives to allow meaningful evaluation, analysis, and comparison with the proposed project" (CEQA Guidelines, § 15126.6) (see General Comment 9).

   c. Mitigation. If avoidance is not feasible, CDFW recommends the DEIR provide measures to mitigate for impacts to sensitive habitats/open space. There should be no net loss of sensitive habitats/open space. CDFW recommends the DEIR provide a measure where any future development facilitated by the Project establishes unobstructed vegetated buffers and setbacks. The DEIR should provide standards for an effective buffer and setback; however, the buffer and setback distance should be increased at a project-

level as needed. The DEIR should provide justifications for the effectiveness of all proposed mitigation measures. The DEIR should provide sufficient information and disclosure to facilitate meaningful public review, analysis, and comment on the adequacy of proposed mitigation measures to offset Project-related impacts on sensitive habitats/open space.

3) Least Bell's Vireo (*Vireo bellii pusillus*). The Project's alignment will pass through several areas documented with least Bell's vireo presence according to the CNDDB (CDFW 2023c). Project implementation during the least Bell's vireo nesting season could adversely affect breeding behavior of least Bell's vireo. Elevated noise and ground-disturbance could result in least Bell's vireo abandoning nesting territory. In addition, elevated noise could result in the incidental loss of nests, fertile eggs, or nestlings. Likewise, Project activities conducted outside of the nesting season may cause the abandonment of more favorable territory and increase the likelihood of mortality due to reduced habitat resources (see Specific Comment 10).

- Phase 3 of the alignment within Camarillo along Santa Rosa Road (34.23726, -118.96733) passes near Arroyo Conejo Creek. Populations of least Bell's vireo have been documented near this location according to the CNDDB. Populations were document just upstream of the confluence between Arroyo Conejo Creek and Arroyo Santa Rosa. The Camrosa discharger station will also be placed close to this section of the Creek.

a. Protection Status. Least Bell's vireo is a listed Endangered Species Act (ESA-) and CESA-listed species. ESA-listed species are considered endangered, rare, or threatened species under CEQA (CEQA Guidelines, § 15380). Take under the ESA is more broadly defined than CESA. Take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. CDFW considers impacts to CESA-listed species a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures.

b. Surveys and Analysis. CDFW recommends the DEIR analyze and discuss the Project's potential impacts on least Bell's vireo and their habitat. The DEIR should have a discussion regarding how the Project avoids and mitigates least Bell's vireo and their associated habitat. The DEIR should be conditioned to perform project-level surveys for least Bell's vireo in the Project alignment and within an appropriate buffer around areas of potential impact. Surveys should follow the USFWS Least Vireo Survey Guidelines (USFWS 2001a).

c. Avoidance. To more effectively avoid areas occupied by least Bell's vireo, the Project should review the CNDDB (ds45) BIOS datasets (CDFW 2023d). CDFW recommends the DEIR provide measures where Project activities avoid encroachment or fragmentation of least Bell's vireo habitat. The Project should avoid natural communities and alliances/associations associated with riparian vegetation. Ground disturbance and vegetation clearing should avoid the nesting bird season (see Specific Comment 10).

d. Mitigation. If avoidance is not feasible, the Applicant should protect or create habitat suitable for least Bell's vireo. Replacement habitat should be protected in perpetuity (see General Comments 7 & 8). CDFW recommends the DEIR be conditioned to provide replacement habitat to ensure no net loss to least Bell's vireo habitat. The DEIR should discuss why mitigation measures proposed would be adequate to avoid or offset impacts to least Bell's vireo and associated habitat. If presence is confirmed, the Applicant should consult with the USFWS and CDFW before ground disturbing activities.

e. CESA ITP. If impacts to least Bell's vireo are possible, appropriate authorization from CDFW under CESA may include an ITP or a Consistency Determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to the project and mitigation measures may be required to obtain an ITP. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP for the Project unless the Project's CEQA document addresses all the Project's impact on CESA endangered, threatened, and/or candidate species. The Project's CEQA document should also specify a mitigation monitoring and reporting program that will meet the requirements of an ITP. It is important that the take proposed to be authorized by CDFW's ITP be described in detail in the Project's CEQA document. Also, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP. However, it is worth noting that mitigation for the Project's impact on a CESA endangered, threatened, and/or candidate species proposed in the Project's CEQA document may not necessarily satisfy mitigation required to obtain an ITP.

4) Rare Plants. The Project's alignment passes several areas where rare and protected plants could exist. Impacts could occur during construction, staging (trampling, crushing, loss of seed bank), and throughout the life of the Project with the establishment of invasive plant species.

- Phase 4 alignment located west of SR 23 and to the north of Tierra Rejada Road will pass critical habitat for Lyon's pentachaeta (*Lyon's pentachaeta*) (CDFW 2023e). Lyon's Pentachaeta is only found in the Conejo Valley and may be present in or around the Project area. California Orcutt grass (*Orcuttia californica*) is also present in this same area (CDFW 2023f).

a. Protection Status. Lyon's pentachaeta is CESA- and ESA- listed species. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9) under CESA. As to CEQA, potential impacts on rare plants should be analyzed, disclosed, and mitigated in the Project's DEIR. CDFW considers adverse impacts to a species protected by CESA and ESA to be significant without mitigation under CEQA.

California Orcutt grass has California Rare Plant Ranking (CRPR) of 1B.1. Plants that have a California Native Plant Society (CNPS) CRPR of 1A, 1B, 2A, and 2B are rare throughout their range, endemic to California, and are seriously or moderately threatened in California. All plants constituting CRPR 1A, 1B, 2A, and 2B meet

the definitions of CESA and are eligible for State listing. Impacts to these species or their habitat must be analyzed during preparation of environmental documents relating to CEQA, as they meet the definition of rare or endangered (CEQA Guidelines, § 15380). Please see CNPS Rare Plant Ranks page for additional rank definitions (CNPS 2023).

b. Survey and Analysis. CDFW recommends the Applicant retain a qualified biologist to perform focused botanical surveys for rare plants with potential to occur. Surveys should identify all individual rare and protected plants and populations, as well as the plant communities supporting those rare plants which may be impacted. Surveys should be conducted within the Project site and in all areas subject to ground-disturbing activities (e.g., staging, mobilization, vegetation clearing). Surveys should be performed at the times of the year when plants will be both evident and identifiable. Botanical surveys should be spaced out throughout the growing season (CDFW 2018g).

c. Disclosure. The DEIR should fully disclose any impacts related to rare plants. At minimum the Applicant should disclose where impacts would occur, number of individual plants impacted, population size and density, and acres of habitat/plant communities impacted.

d. Avoidance. If rare plants are present and anticipated to be impacted, CDFW recommends the DEIR provide measures to fully avoid impacts on rare plants and their habitat.

e. Mitigation. If take or adverse impacts to rare plants cannot be avoided, the DEIR should provide measures to mitigate for those impacts. Appropriate mitigation may include obtaining appropriate take authorization under CESA prior to implementing the Project (pursuant to Fish & Game Code, § 2080 et seq.). Appropriate authorization may include an ITP or Consistency Determination, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Additionally, CDFW recommends the Applicant provide compensatory mitigation for loss of rare plants and habitat.

5) Coastal California Gnatcatcher (*Polioptila californica californica*). Project implementation will occur next to habitat utilized by ESA-listed and Species of Special Concern (SSC) coastal California gnatcatcher (CDFW 2023h). Project activities occurring during the breeding and nesting season could result in the incidental loss of fertile eggs or nestlings. Project implementation surrounding occupied habitat may result in permanent impacts to coastal California gnatcatcher through alteration, fragmentation, and/or loss of suitable nesting and foraging habitat (see Specific Comment 10). Use of heavy machinery, increased light, dust, vibrations, and human activity may disrupt or alter behaviors necessary for species survival and lead to nest abandonment. Outside of the breeding season the species could be forced from their territory into adjacent habitat that may be less suitable where they would be at risk of predation, starvation, or other injury. Coastal California gnatcatcher are non-migratory, territorial, and have been found not to disperse far from their natal nests (Bailey 1998; Vandergast 2019). Thus, the preservation of sensitive natural communities where they have been documented to utilize is of conservational importance.

- Phase 4 alignment would pass by designated final critical habitat for coastal California gnatcatcher located just east of State Route (SR 23) and north of Tierra Rejada Road (see Specific Comment 2).

- Phase 4 alignment would traverse past several areas documented by the California Natural Diversity Database (CNDDB) to house coastal California gnatcatcher. Observations of gnatcatcher have been made west of the SR 23 and north of Tierra Rejada Road in areas associated with Moorpark's Carlsberg Specific Plan residential tract. Populations are also documented in the open space area east of SR 23 and south of Tierra Rejada Road (34.2693, -118.8182).

a. Protection Status. Coastal California gnatcatcher is an ESA-listed species and a California SSC. ESA-listed species are considered endangered, rare, or threatened species under CEQA (CEQA Guidelines, § 15380). Take under the ESA is more broadly defined than CESA. Take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. CEQA provides protection not only for State and federally listed species, but for any species including, but not limited to SSC, which can be shown to meet the criteria for State listing. SSC's meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15065). Take of SSC's s could require a mandatory finding of significance (CEQA Guidelines, § 15065).

b. Survey and Analysis. CDFW recommends the DEIR analyze and discuss the Project's potential impacts on coastal California gnatcatcher and their habitat. The DEIR should have a discussion regarding how the project avoids and mitigates impacts to coastal California gnatcatcher and associated habitat. The DEIR should be conditioned to perform project-level surveys for coastal California gnatcatcher in the development footprint and within an appropriate buffer around areas of potential impact. Surveys should follow protocols outlined in the U.S. Fish and Wildlife Service's Coastal California Gnatcatcher Presence/Absence Survey Guidelines (USFWS 1993b).

c. Avoidance. To more effectively avoid areas occupied by costal California gnatcatcher, the Project should review the Coastal California Gnatcatcher Final Critical Habitat (ds404) and the CNDDB (ds45) BIOS datasets (CDFW 2023d). CDFW recommends the DEIR provide measures where Project activities avoid encroachment or fragmentation of coastal California gnatcatcher habitat and critical habitat. The Project should avoid natural communities and alliances/associations that fall under the coastal sage scrub umbrella. Ground disturbance and vegetation clearing should avoid the nesting bird season (see Specific Comment 10).

d. Mitigation. If avoidance is not feasible, the Applicant should protect or create habitat suitable for coastal California gnatcatcher. Replacement habitat should be protected in perpetuity (see General Comments 7 & 8). CDFW recommends the DEIR be conditioned to provide replacement habitat to ensure no net loss to gnatcatcher habitat. The DEIR should discuss why mitigation measures proposed would be adequate to avoid or offset impacts to gnatcatcher and associated habitat. If presence is confirmed, the Applicant should consult with USFWS and CDFW before ground disturbing activities.

6) Riverside Fairy Shrimp (*Streptocephalus woottoni).* Although the Project alignment follows established roads, Project activities such as dewatering may impact the adjacent vernal pool

housing Riverside fairy shrimp. Impacts due to increased dust and vibration may also negatively impact Riverside fairy shrimp.

- Phase 4 of the alignment follows Tierra Rejada Road including the section directly west of SR 23 (34.26595, -118.85550). This area is designated as critical habitat for the Riverside fairy shrimp (CDFW 2023i).

a. Protection Status. Riverside fairy shrimp is an ESA-listed species. ESA-listed species are considered endangered, rare, or threatened species under CEQA (CEQA Guidelines, § 15380). Take under the ESA is more broadly defined than CESA. Take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting.

b. Analysis and Surveys. CDFW recommends the analyze any potential impacts due to dewatering given the close proximity to the critical habitat area (see Specific Comment 2). Analysis on indirect impacts such as increased dust and vibrations should also be included. CDFW recommends the Project retain a qualified biologist familiar with Riverside fairy shrimp. The qualified biologist should use protocols outlined within the USFW's Survey Guidelines for the Listed Vernal Pool Branchiopods (USFWS 2017c).

c. Avoidance. To more effectively avoid areas occupied by Riverside fairy shrimp the Project should review the Riverside fairy shrimp Final Critical Habitat (ds149) and the CNDDB (ds45) BIOS datasets (CDFW 2023i & CDFW 2023d). The DEIR should provide measures to fully avoid impacts to Riverside fairy shrimp and their habitat.

d. Mitigation. The DEIR should include mitigation measures to reduce potential impacts from dewatering and increased vibration and dust. The Applicant should consult with USFWS to determine if an Incidental Take Permit (ITP) is necessary. If an ITP is necessary, the Project should adhere to any additional requirements set by the permit. CDFW recommends early consultation with USFWS to avoid potential impacts to Riverside fairy shrimp.

7) Reptiles of SSC. Project activities related to ground disturbance, such as grading, staging, and grubbing, may result in reptile habitat destruction and death or injury of adults, juveniles, eggs, or hatchlings. Moreover, the Project may remove essential foraging and breeding habitat for the species. A review of the CNDDB revealed several SSC reptiles along the Project's alignment.

- Along the Phase 3 alignment near the intersection of Upland Road and Santa Rosa Road, Project activities will occur close to Conejo Creek. A review of the CNDDB reveal western pond turtle (*Emys marmorata*) have potential to occur there and throughout Conejo Creek (CDFW 2023j).

- Along the Phase 4 alignment, California legless lizard (*Anniella spp*.) observations were recorded near the intersection of Santa Rosa Road and Moorpark Road (34.24697, -118.87002) (CDFW 2023k).

a. Surveys. CDFW recommends qualified biologists familiar with the reptile species behavior and life history conduct focused surveys to determine the presence/absence of

SSC prior to vegetation removal and/or grading. Surveys should be conducted during active season when the reptile species is most likely to be detected. Surveys for western pond turtle should be conducted in accordance to the U.S. Geological Surveys Draft USGS Visual Survey Protocol for the Southcoast Region (USGS 2006).

b. Mitigation. To further avoid direct mortality, CDFW recommends that a qualified biological monitor be on site during ground and habitat disturbing activities to move out of harm's way special status species that would be injured or killed by grubbing or Project-related grading activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss (see General Comment 6).

c. Scientific Collections Permit. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & Game Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's Scientific Collecting Permit webpage for information (CDFW 2022l). Pursuant to the California Code of Regulations, title 14, section 650, the qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities.

8) Lake and Streambed Alteration (LSA) Agreement. The Project alignment crosses several riparian areas as depicted by Figures 3-6 of the related Initial Study. Although trenchless methods would be utilized in these areas, impacts could still occur through frac-outs, or at trenchless implementation entrance and exit points.

a. Stream Delineation and Assessment. A preliminary delineation of the streams and their associated riparian habitats should be included in the environmental document. Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.

b. Avoidance and Setbacks. In Project areas which may support ephemeral or episodic streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of these resources and help maintain natural sedimentation processes. Therefore, CDFW recommends effective setbacks be established to maintain appropriately sized vegetated buffer areas adjoining ephemeral drainages. The environmental document should provide a justification for the effectiveness of the chosen distance for the setback.

c. Lake and Streambed Alteration Program. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream or use material from a streambed. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW

pursuant to Fish and Game Code Section 1600 *et seq.* CDFW's issuance of a 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 environmental document of the local jurisdiction (Lead Agency) for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the environmental document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. Please visit CDFW's Lake and Streambed Alteration Program webpage for information about LSA Notification (CDFW 2022m).

d. Hydrologic Evaluation. Project-related changes in upstream and downstream drainage patterns, runoff, and sedimentation should be included and evaluated in the environmental document.

9) Oak Trees (*Quercus* genus) and Oak Woodlands (*Quercus* Woodland Alliance). The Initial Study states that the roadways that align with the Project are surrounded by mature trees. If these trees include any trees within the oak genus or comprise oak woodland, Project activities could result in loss and removal. Oak woodlands are locally important communities and serve various ecological functions. Oak woodlands also have higher levels of biodiversity than any other terrestrial ecosystem in California (Block et al. 1990). Oak trees provide nesting and perching habitat for approximately 170 species of birds (Griffin and Muick 1990). Moreover, 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 on-going loss of these resources.

a. Arborist Report. CDFW recommends the District retain a qualified arborist to survey all oak trees that could be impacted by the Project. The tree survey should provide information on the presence of pests and diseases, including (but not limited to): sudden oak death *(Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), Polyphagous shot hole borer (*Euwallacea spp.*), and goldspotted oak borer (*Agrilus auroguttatus*) (Phytosphere Research 2012; TCD 2021; UCANR 2018; UCIPM 2021). A tree report should be included in the DEIR.

b. Disclosure. Adequate disclosure includes providing the following information at a minimum: 1) location of each tree and area of oak woodland impacted; 2) scientific (Genus, species, subspecies, or variety) and common name of each tree and understory plant species impacted; 3) the size (diameter at breast height, inches) of each tree impacted; 4) a clear identifier to distinguish heritage trees; 5) acres of oak woodlands impacted; 6) mitigation ratio for individual trees and acres of oak woodlands; 7) total number of replacement trees and acres of oak woodlands; and, 8) total number of replacement trees and appropriate understory species to occur in suitable on- and/or offsite mitigation lands.

c. Avoidance. CDFW recommends the DEIR provide measures to avoid impacts to oak trees and oak woodlands during the Project. The DEIR should provide measures to fully protect the Critical Root Zone of all oak trees not targeted for removal. The DEIR should also provide measures to protect the outer edge of oak woodlands with appropriate setbacks. The DEIR should provide a justification as to why proposed setback

distance(s) would be effective to avoid impacts on oak trees and oak woodlands in perpetuity.

d. Mitigation. For unavoidable Project impacts, CDFW recommends creating or restoring on- or off-site oak woodland habitat or planting individual oaks. The number of replacement trees and oak woodland habitat acres should be higher if the Project would impact large oak trees; impact an oak woodland supporting rare, sensitive, or special status plants and wildlife; or impact an oak woodland with a State rarity ranking of S1, S2, or S3 (see General Comment 2a). CDFW recommends the DEIR discuss why mitigation proposed by the District would reduce impacts on oak woodlands to less than significant and would be effective to mitigate for the number of trees, size of trees (e.g., heritage trees), and acres of habitat impacted. CDFW recommends the DEIR provide an on- or off-site mitigation plan and discuss the suitability of selected location(s) for mitigating impacts to oak trees and oak woodlands. The DEIR should provide information about reference sites, with similar species and habitat as being mitigated and the suitability of selected reference site(s) to inform the Project's mitigation plan. Lastly, a mitigation plan should provide specific mitigation goals and actions to achieve those goals to establish self-sustaining oak trees and oak woodlands.

e. Pest Management. Project activities have the potential to spread tree pests and diseases throughout the Project site and into adjacent natural habitat not currently exposed to these stressors. This could result in expediting the loss of native trees and woodlands. As such, CDFW recommends the DEIR include an infectious tree disease management plan or provide mitigation measures, developed in consultation with an arborist, and describe how the plan or mitigation measures will avoid or reduce the spread of tree insect pests and diseases.

10) Special Status Bird Species. Mature trees and vegetation have been identified along the Project alignment. Project activities and vegetation removal that occur during the breeding season may result in incidental loss of fertile eggs, or nestlings, or nest abandonment in trees and shrubs directly adjacent to the Project. The Project could also lead to the loss of foraging habitat for sensitive bird species.

a. Protection Status. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the MBTA).

b. Avoidance. CDFW recommends that measures be taken, primarily, to avoid Project impacts to nesting birds. The DEIR should be conditioned with measures to avoid impacts on special status birds. Proposed Project activities including (but not limited to) staging and disturbances to native and nonnative vegetation, structures, and substrates should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs.

c. Mitigation. If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be

disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

11) Weed Management Plan. Weed management plans should be developed along the Project alignment 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 if 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.

General Comments

1) Disclosure. The DEIR should provide an adequate, complete, and detailed disclosure about the effect which a proposed Project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure 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 species (e.g., current range, distribution, population trends, and connectivity).

2) Biological Baseline Assessment. CDFW recommends providing a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area, with emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. The DEIR should include the following information:

   a. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities (CDFW 2022n) from Project-related impacts. Project implementation may result in impacts to rare or endangered plants or plant communities that have been recorded adjacent to the Project vicinity;

   b. A complete floristic assessment within and adjacent to the Project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. This should include a thorough, recent, floristic-based assessment of special status plants and natural communities;

   c. Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. The

Manual of California Vegetation (MCV), second edition, should also be used to inform this mapping and assessment (CNPS 2023). 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;

d. A complete, recent, assessment of the biological resources associated with each habitat type on-site and within adjacent areas that could also be affected by the Project. CDFW's CNDDB in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. CDFW recommends that CNDDB Field Survey Forms (CDFW 2022o) be completed and submitted to CNDDB to document survey results;

e. A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on-site and within the area of potential effect, including California SSC and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the USFWS; and,

f. A recent, wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to two years as long as there was not a prevailing drought during the time of the botanical survey. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases.

3) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting CNDDB Field Survey Forms (CDFW 2021o). The applicant should ensure data collected for the preparation of the DEIR be properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred.

4) Biological Direct, Indirect, and Cumulative Impacts. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR:

a. A discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish &

Game Code, § 2800 et. seq.). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;

b. A discussion of both short-term and long-term effects to species population distribution and concentration and alterations of the ecosystem supporting the species impacted [CEQA Guidelines, § 15126.2(a)];

c. A discussion of adverse impacts due to increased noise, sound, vibrations, and human activity during Project activities and daily operations;

d. 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 in the DEIR;

e. A discussion of Project-related changes on drainage patterns and downstream of the Project site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included; and,

f. 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. If the applicant determines that the Project would not have a cumulative impact, the DEIR should indicate why the cumulative impact is not significant. The Applicant's conclusion should be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].

5) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental impact report shall describe feasible measures which could mitigate for impacts below a significant level under CEQA.

a. Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, §§ 15126.4, 15041). A public agency shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures (Pub. Resources Code, § 21081.6). CDFW recommends that the District prepare mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented

successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). Adequate disclosure is necessary so CDFW may provide comments on the adequacy and feasibility of proposed mitigation measures.

b. Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the Project as proposed, the environmental document should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the environmental document should provide an adequate, complete, and detailed disclosure about a project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.

6) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from a project site and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.

7) Compensatory Mitigation. An environmental document should include mitigation measures for adverse Project related direct or indirect impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, 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.

8) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, an environmental document should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.

9) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:

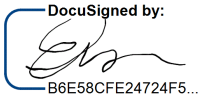
a. A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas; and,

b. A range of feasible alternatives to Project component location and design features to ensure that alternatives to the proposed Project are fully considered and evaluated. Potential impacts to wildlife movement areas should also be evaluated, avoided, or mitigated consistent with applicable requirements of the applicable City's General Plan.

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 or Leslie Hart, Environmental Scientist at Leslie.Hart@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW

Steve Gibson – Los Alamitos
Steve.Gibson@Wildlife.ca.gov

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

Susan Howell – San Diego
Susan.Howell@Wildlife.ca.gov

CEQA Program Coordinator – Sacramento
CEQACommentLetters@Wildlife.ca.gov

OPR

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

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