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December 20, 2023

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**SUBJECT: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE AMERICAN JEWISH UNIVERSITY – CAMP ALONIM PROJECT, SCH #2023110297**

Dear Michael Conger:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) from the Ventura County Resource Management Agency (County) for the American Jewish University – Camp Alonim Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

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 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 & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (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 fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for

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example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. 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 & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

## PROJECT DESCRIPTION SUMMARY

**Proponent:** American Jewish University

**Objective:** The Project proponent requests a major modification to Conditional Use Permit No. 1776 and a discretionary tree permit for the development of additional facilities at Camp Alonim. Proposed facilities include a welcome center, 13 camper cabins, 3 head counselor cabins, an arts pavilion, and a parking lot with 58 new parking spaces. Landscaping improvements would occur around the new structures. In addition to new development, seven existing structures would be demolished. The Project would require removal of 74 trees, including nine coast live oak (*Quercus agrifolia*) and one sycamore (*Plantanus* sp.) tree, and encroachment of the protected zone of several trees on site.

**Location:** The 2,588-acre Project is located at 1101 Peppertree Lane in the City of Simi Valley, Ventura County. The Project site is located near the base of the Santa Susana Mountains and is bordered by undeveloped open space. The Assessor Parcel Numbers associated with the Project include 685-0-051, -040, -050, -140, -190, and -210.

**Biological Setting:** A portion of the Project site is currently developed with the American Jewish University's Brandeis-Bardin Campus (campus), which includes Camp Alonim, the Brandeis Collegiate Institute, and other associated uses. The proposed facilities would be constructed near the existing campus within 328 acres of the 2,588-acre Project site. Beyond the immediate borders of the Project site lies Sage Ranch Park and Rocketdyne Santa Susana Field Lab to the south and residential communities to the north. A biological baseline assessment was not provided in the NOP to provide information related to the biological resources (i.e., flora, fauna, watercourses) within the Project site. Through aerial imagery, it appears that the areas within the 328 acres may support a woodland habitat and other natural communities.

Based on observations recorded through the California Natural Diversity Database (CNDDDB), the Project has potential to impact various sensitive species, including Crotch's bumble bee (*Bombus crotchii*; CESA candidate endangered), California legless lizard (*Anniella stebbinsi*; California Species of Special Concern (SSC)), coastal whiptail (*Aspidoscelis tigris stejnegeri*; SSC), California leaf-nosed bat (*Macrotus californicus*; SSC), pallid bat (*Antrozous pallidus*; SSC), and western mastiff bat (*Eumops perotis californicus*; SSC).

## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant,

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direct and indirect impacts on fish and wildlife (biological) resources. The EIR should provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, §21061; CEQA Guidelines, §§15003(i), 15151]. CDFW looks forward to commenting on the EIR when it is available.

- 1) Local Wildlife Movement. Although the Project site is not located within a designated wildlife corridor, there is undeveloped open space surrounding the proposed 328 acres, where development is anticipated to occur. CDFW recommends the EIR analyze whether the Project would impact local wildlife movement that occurs throughout the entire Project site. Impacts include, but are not limited to, habitat loss and fragmentation, narrowing of wildlife corridors, and introduction of barriers to wildlife movement. Technical detail such as data, maps, diagrams, and similar relevant information should be provided to allow full assessment of significant environmental impacts by reviewing agencies and members of the public (CEQA Guidelines, §15147). If avoidance of corridor encroachment is not feasible, the EIR should provide measures to mitigate the Project's significant impacts to local wildlife movement.
- 2) Crotch's Bumble Bee. Recently, the California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. CDFW considers adverse impacts to a species protected by CESA, for the purposes of CEQA, to be significant without mitigation. There is potential for Crotch's bumble bee to occur within the Project site. Crotch's bumble bees primarily nest in late February through late September underground in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, beneath brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al., 2014; Hatfield et al., 2018). Overwintering sites utilized by Crotch's bumble bee queens include soft, disturbed soil (Goulson, 2010), or under leaf litter or other debris (Williams et al., 2014).

The EIR should analyze the Project's impact on floral resources, nesting habitat, and overwintering habitat for Crotch's bumble bee. The EIR should also provide full disclosure of the presence of Crotch's bumble bee within the Project site. Additionally, CDFW recommends that a qualified entomologist familiar with the species' behavior and life history conduct surveys within one year prior to vegetation removal and/or ground disturbance to determine the presence/absence of Crotch's bumble bee. Surveys for Crotch's bumble bee should adhere to the [Survey Considerations for California Endangered Species Act \(CESA\) Candidate Bumble Bee Species](#) (CDFW 2023).

- 3) Oak Trees. It is undisclosed in the NOP if an oak woodland will be impacted; however, several oak trees will be removed from the Project site and encroachment on the protected zone of several trees will occur. CDFW recommends the EIR provide measures to avoid impacts to any remaining oak trees and oak woodlands during Project activities. Avoidance measures should be effective, specific, enforceable, and feasible. The EIR should also provide measures to fully protect the protected zone of all oak trees not targeted for removal from ground disturbance activities.

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CDFW recommends the EIR 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 EIR 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. The mitigation plan should provide specific mitigation goals and required measures to establish self-sustaining oak trees and oak woodlands.

- 4) Reptile Species. The Project site may provide suitable habitat for coastal whiptail and California legless lizard. Both species are designated as SSC. CDFW considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures [CEQA Guidelines, §§ 15064, 15065, 15125(c), and 15380].

CDFW recommends the EIR thoroughly discuss the potential for impacts to these species, assume their presence, and include a mitigation measure or measures which provide compensatory mitigation for Project impacts on SSC.

- 5) Bats Species. In urbanized areas, numerous bat species are known to roost in trees and structures throughout Ventura County. Bats may use trees and man-made structures (e.g., cracks and crevices in large concrete structures) for daytime and nighttime roosts. Bats and roosts could be impacted by removal of trees, vegetation, and/or structures supporting roosting bats. This could result in injury and/or mortality of bats, as well as loss of roosting habitat. Bats and roosts could also be impacted by increased noise, human activity, dust, and ground vibrations.

CDFW recommends that a qualified bat specialist be retained to identify potential daytime, nighttime, wintering, and hibernation roost sites and conduct bat surveys within these areas (plus a 100-foot buffer as access allows) to identify roosting bats and any maternity roosts. CDFW recommends using acoustic recognition technology to maximize detection of bats.

If the Project would impact bats, CDFW recommends the EIR include measures to avoid and minimize impacts on bats, roosts, and maternity roosts. A qualified bat specialist should be retained to identify potential daytime, nighttime, wintering, and hibernation roost sites and conduct bat surveys within these areas (plus a 100-foot buffer as access allows) to identify roosting bats and any maternity roosts.

- 6) Wetlands, Streams, and Riparian Areas. Based on a review of the National Hydrography Dataset, the Project site appears to contain a stream (USGS 2023). CDFW recommends the County conduct a delineation to determine the presence and lateral extent of wetlands, streams, and riparian areas. The results of the study and mitigation measures for avoidance and minimization of impacts should be discussed in the EIR.

CDFW has regulatory authority over activities in streams and/or lakes that will substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake, or deposit or dispose of debris, waste, or other

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material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake. For any such activities, the Project applicant (or “entity”) must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. CDFW’s issuance of a LSAA will require CEQA compliance actions by CDFW as a Responsible Agency. CDFW as a Responsible Agency under CEQA may consider the County’s Environmental Impact Report for the Project. To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to any stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSAA.

- 7) Facility Sites. The EIR should include a discussion of the criteria used to select the locations of new facilities and disclose any considerations for natural resources that were used in the decision-making process. Comprehensive biological surveys should be conducted at each proposed facility site, and the survey results should be included in the EIR.
- 8) Lighting Design. Artificial night lighting can affect plants and wildlife through attraction and disorientation, loss of connectivity, interference with pollination and foraging, and disruption of circadian rhythms and lunar and seasonal cycles (Barrientos et al 2023). Methods for minimizing adverse effects of artificial night lighting include lighting only where light is necessary, turning lights off when they are not in use (e.g., motion detector), only using as much light as is needed, directing the light only where it is needed, and using the lowest possible correlated color temperature for the goal of the lighting.

CDFW recommends the County require a lighting plan that discusses the criteria used in selecting the various types of lighting fixtures, a schedule detailing the hours the various lights will be on, and steps taken to minimize adverse effects. If the County has developed best management practices for lighting design, those protocols should be discussed in the EIR.

- 9) Nesting Birds and Raptors. CDFW recommends the EIR include a measure to fully avoid impacts to nesting birds and raptors. To the extent feasible, no construction, ground-disturbing activities (e.g., mobilizing, staging, and excavating), and vegetation removal should occur during the avian breeding season which generally runs from February 1 through September 1 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs. If impacts to nesting birds and raptors cannot be avoided, CDFW recommends the EIR include measures to minimize impacts on nesting birds and raptors. Prior to starting ground-disturbing activities and vegetation removal, a qualified biologist should conduct nesting bird and raptor surveys to identify nests. The qualified biologist should establish no-disturbance buffers to minimize impacts on those nests. CDFW generally recommends a minimum 100-foot no disturbance buffer around active passerine nests. For raptors, the no disturbance buffer should be expanded to 500 feet. Reductions in the nest buffer may occur in

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consideration of site-specific features such as ambient levels of human activity, screening vegetation, or other factors.

## General Comments

- 1) **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, wildlife, and natural habitats, we recommend the following information be included in the EIR:
  - a. The document should contain 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.
  - b. A range of feasible alternatives should be included to ensure that alternatives to the proposed Project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.
- 2) **Biological Resource Inventory.** The document should provide a complete assessment of the flora and fauna 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 complete floral and faunal species compendium of the entire Project site, undertaken at the appropriate time of year. The EIR should include the following information.
  - a. CEQA Guidelines, section 15125(c), specifies that knowledge on the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
  - b. A thorough, recent floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <https://www.wildlife.ca.gov/Conservation/Plants/Info>). CDFW recommends that floristic, alliance-based and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
  - c. A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. CDFW's California Natural Diversity Data Base in Sacramento should be contacted at <https://www.wildlife.ca.gov/Data/BIOS> to obtain current information on any previously reported sensitive species and

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habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.

- d. An inventory of rare, threatened, endangered, and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive invertebrates, fish, reptile, amphibian, bird, and mammal species. 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 U.S. Fish and Wildlife Service.
- 3) **Biological 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 EIR.
    - a. A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, recreational uses, and drainage. Mitigation measures proposed to alleviate such impacts should be included.
    - b. 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.
  - 4) **Mitigation for Project-related Biological Impacts.** The EIR should include mitigation measures for Project-related impacts to sensitive plants, animals, and native vegetation communities (sage scrub, chaparral, native grassland, riparian, or oak woodlands or savannahs) as well as naturalized habitat such as non-native grasslands where they support or provide essential habitat for native wildlife (e.g., for raptor foraging, etc.). Mitigation measures should emphasize avoidance of functional habitat blocks and/or reduction of Project impacts. For unavoidable impacts, compensatory mitigation (conservation/protection of habitat on or offsite) should be discussed in detail.
  - 5) **Incidental Take Authorization.** Take of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.) is prohibited, except as authorized by state law (Fish & G. Code, §§ 2080, 2085).

If the Project, Project construction, or any Project-related activity during the life of the Project will result in take of any such species, CDFW recommends that the Project proponent seek appropriate take authorization prior to implementing the Project. Appropriate authorization may include an incidental take permit (ITP), a consistency determination, or other options (Fish & G. Code §§ 2080.1, 2081, subds. (b), (c)). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. CDFW recommends that the County ensure the Project proponent is aware of any potential take that may result from the Project. CDFW recommends the EIR contain biological mitigation, monitoring, and

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reporting requirements that are of sufficient detail and resolution to satisfy the requirements for a CESA ITP. CDFW may be required to prepare a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation, monitoring, and reporting program that will meet the requirements of an ITP.

## **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations 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 during Project surveys to the California Natural Diversity Database (CNDDDB). Instructions for submittal are available online at <https://wildlife.ca.gov/Data/CNDDDB>. Additionally, information on special status native plant populations and sensitive natural communities should be submitted to CDFW's Vegetation Classification and Mapping Program. Instructions for submittal are available online at <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>.

## **ENVIRONMENTAL DOCUMENT FILING FEES**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order 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**

CDFW appreciates the opportunity to comment on the NOP to assist the County in identifying and mitigating Project impacts on biological resources. Questions regarding this letter or further coordination should be directed to Kelly Fisher, Environmental Scientist, (858) 354-5083 or [Kelly.Fisher@wildlife.ca.gov](mailto:Kelly.Fisher@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
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David Mayer  
Environmental Program Manager  
South Coast Region



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