



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
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San Diego, CA 92123  
[wildlife.ca.gov](http://wildlife.ca.gov)

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



February 28, 2025

Noe Torres  
County of Ventura Resource Management Agency  
800 South Victoria Avenue  
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**SUBJECT: MITIGATED NEGATIVE DECLARATION FOR THE TASCHEN RANCH COASTAL PLANNED DEVELOPMENT PERMIT PROJECT, SCH NO. 2025020147, VENTURA COUNTY, CA**

Dear Noe Torres:

The California Department of Fish and Wildlife (CDFW) reviewed the Mitigated Negative Declaration (MND) from Ventura County (County) for the Taschen Ranch Coastal Planned Development Permit (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines<sup>1</sup>.

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, CDFW appreciates 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 (Fish & G. Code, § 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.

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<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW may also act 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 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<sup>2</sup> 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:** Mark Lloyd

**Objective:** The objective of the Project, with the approval of a Coastal Planned Development Permit, is to construct a pool, deck, cabana, seating pad, and an equipment pad with a 6-foot fence as part of an existing single-family dwelling. Primary Project activities include cut and fill earthwork and utility upgrades, such as installation of one subsurface water line, one subsurface propane line, and one overhead electric line. Two new water wells, for the existing agricultural use, will be drilled. One water well would be located approximately 1,000 feet south of the existing dwelling and the other would be located approximately 110 feet southeast of the existing dwelling. Multiple shade house structures and cooler sheds will be removed. Lastly, two agricultural cargo containers will be constructed.

**Location:** The Project site is approximately 0.179 acre. It is located at 12233 Cotharin Road (Assessor's Parcel Number 701-0-030-350 and 701-0-030-360) in the Santa Monica Mountains of an unincorporated area of Ventura County. The intersection of Cotharin Road and Yerba Buena Road are located approximately 0.35 miles south of the Project site. Existing bridges across Yerba Buena Creek allows for an unpaved private road to run adjacent to the creek and connects to Cotharin Road to the south.

**Biological Setting:** The Project site includes residential development, accessory structures, land used for agriculture and is surrounded by open space that contains non-native and native grasslands. Residential and/or commercial development is also located south of the Project site. Yerba Buena Creek runs along the western portion of the survey area (grading footprint and 300-foot buffer), flowing from north to south. Yerba Buena Creek is an ephemeral drainage and is vegetated by coast live oak-California sycamore (*Platanus racemosa*) woodland and is considered Environmental Sensitive Habitat Area (ESHA) for the County.

Stantec conducted biological assessment surveys in 2016, 2017, 2020, and 2022. No special-status plant or wildlife species were detected during biological surveys. The

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<sup>2</sup> "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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findings were included in the Initial Study Biological Assessment of the NOP. The vegetation communities present in the Project site include coast live oak (*Quercus agrifolia*) woodland (0.34 acre), coast live oak-California sycamore woodland (0.32 acre), and wild oats (*Bromus spp.*) grassland (1.32 acre). The Project proposes to impact wild oats grassland (0.116 acre) and cleared land (0.063 acre). In the northwestern portion of the survey area, 0.170 acre of bigpod ceanothus (*Ceanothus megacarpus*) - chamise (*Adenostoma fasciculata*) chaparral ESHA was cleared without a permit in 2016. Moreover, approximately 0.30 acre of bigpod ceanothus-chamise shrubland, 0.13 acre of bigpod ceanothus chaparral, and 0.18 acre of California sagebrush-ashy buckwheat shrubland was removed after the 2018 Woosley Fire. The Project proposes compensatory mitigation of impacted ESHA at a 2:1 ratio. Additionally, the Project would encroach into the protected zone of four coast live oak trees.

Sensitive species that are of potential concern for the Project include, but are not limited to, western pond turtle (*Emys marmorata*; California Species of Special Concern (SSC)), two-striped garter snake (*Thamnophis hammondi*; SSC), and monarch - California overwintering population (*Danaus plexippus plexippus pop. 1*; Endangered Species Act (ESA) proposed threatened).

The MND provides mitigation measures BIO-1 through BIO-11 relating to the Tree Protection Plan per the County's ordinance, tree health monitoring, fauna pre-construction surveys and avoidance, monarch butterfly surveys and avoidance, nesting bird avoidance, ESHA fencing, invasive plant species management, compensatory mitigation for ESHA, fuel modification plan, wildlife corridor fencing, and outdoor lighting.

## 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, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document.

### COMMENT # 1: Impacts to Yerba Buena Creek

**Issue:** The Project may indirectly impact Yerba Buena Creek.

**Specific impact:** Project activities (i.e., grading and ground disturbance) may cause indirect impacts, such as sedimentation and erosion, to Yerba Buena Creek and associated aquatic resources.

**Why impact would occur:** Project construction and activities occurring adjacent to and within the 100-foot buffer of the creek could impact it and associated riparian vegetation. Additionally, western pond turtle and two-striped garter snake have a moderate potential to occur within Yerba Buena Creek, according to the MND. Indirect impacts to the stream may negatively impact SSC. Lastly, the Project will result in more than 1.0-acre

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feet of net annual increase in groundwater extraction which may adversely affect the creek and its associated species.

**Evidence impact may be significant:** CDFW exercises its regulatory authority as provided by Fish and Game Code section 1600 *et seq.* to conserve fish and wildlife resources, which includes rivers, streams, or lakes and associated natural communities. Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

1. Divert or obstruct the natural flow of any river, stream, or lake;
2. Change the bed, channel, or bank of any river, stream, or lake;
3. Use material from any river, stream, or lake; or
4. Deposit or dispose of material into any river, stream, or lake.

The Project may adversely affect the existing water features and the hydrology pattern of the Project site. Inadequate avoidance and mitigation measures will 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.

### **Recommended Potentially Feasible Mitigation Measure(s)**

#### **Mitigation Measure #1: Lake and Streambed Alteration (LSA) Agreement**

CDFW requests the Project proponent provide a hydrogeological report, which may contain a well completion report, to evaluate the effects of groundwater extraction on surface and subsurface resources. If the hydrology report shows substantial diversion from Yerba Buena Creek, the Project proponent shall notify CDFW pursuant to Fish and Game Code 1602 and obtain an LSA Agreement from CDFW. The Project proponent shall comply with the mitigation measures detailed in an LSA Agreement issued by CDFW. Please visit [CDFW's Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2024a).

#### **Recommendation #1: CEQA**

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 from the County for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 *et seq.* and/or under CEQA, the Project's CEQA document should fully identify the Project's potential impacts on stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. As such, CDFW recommends the County consider CDFW's comments and revise the MND by incorporating the mitigation measures recommended in this letter into the Project's environmental document. To compensate for any on- and

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off-site impacts to aquatic and riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures, avoidance of resources, protective measures for downstream resources, on- and/or off-site habitat creation, enhancement, or restoration, and/or protection, and management of mitigation lands in perpetuity.

## **COMMENT # 2: Impacts to SSC**

**Issue:** SSC may be adversely impacted by Project buildout.

**Specific impact:** Direct impacts to SSC reptiles could result from Project construction and activities (e.g., equipment staging, mobilization, and grading); ground disturbance; vegetation clearing; and trampling or crushing from construction equipment, vehicles, and foot traffic. Additionally, relocation of species may result in adverse impacts during trapping and/or transit.

**Why impact would occur:** The County acknowledges the potential presence of western pond turtle and two-striped garter snake and provides mitigation measure BIO-3, which describes pre-construction surveys, avoidance measures, and relocation strategies. Based on the mitigation measure, a pre-construction survey would occur 14 days prior to activities; however, this window may allow species to return to the Project site and go undetected until Project activities commence. CDFW recommends the pre-construction survey be conducted within three days prior to the initiation of ground disturbing activities to further avoid adverse effects to SSC. Moreover, actively relocating species out of the Project site may result in incidental injury or physical distress, especially during the transit process. While relocation activities may be warranted, species should be given the opportunity to move out of harm's way on their own accord.

**Evidence impact would be significant:** A California Species of Special Concern is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

1. if the species is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
2. if the species is listed as threatened or endangered under ESA-, but not CESA-, threatened, or endangered;
3. if the species meets the State definition of threatened or endangered but has not formally been listed;
4. if the species is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and,
5. if naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or -endangered status (CDFW 2024b).

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## Recommended Potentially Feasible Mitigation Measure(s)

**Mitigation Measure #2: Pre-Construction Surveys and Impact Avoidance** - The County should revise BIO-3 to incorporate the underlined language and omit language in strikethrough:

**Purpose:** To avoid significant impacts to special-status wildlife that could occur during vegetation clearing and grading.

**Requirement:** ~~Two weeks~~ Three days prior to the initiation of, and periodically throughout, ground disturbance activities when water is present, a County-approved qualified biologist shall conduct surveys for special-status wildlife, including western pond turtle and two-striped garter snake, to ensure that these species are not harmed. ~~Individuals of these species that are found shall be relocated to suitable undisturbed habitat, outside of the areas directly and indirectly (e.g., noise) affected by ground disturbance activities, as determined by a County approved biologist.~~ The County-approved biologist, with a CDFW Scientific Collecting Permit, shall conduct surveys ~~and relocation activities~~ according to methods approved by the CDFW. If a special-status species is found, the qualified biologist shall contact CDFW, and the species shall be passively ushered out of harm's way to an area that is unaffected by the Project. If the Project requires special-status species to be removed, disturbed, or otherwise handled, the qualified biologist shall prepare a species-specific list (or plan) of proper handling and passive relocation protocols. The list (or plan) of protocols shall be implemented during Project construction and activities/biological construction monitoring.

**Documentation:** The Permittee shall provide to the Planning Division a signed contract with a County-approved qualified biologist that ensures wildlife surveys, and relocation of wildlife, will be conducted within ~~14 days~~ three days prior to any ground disturbance activities. The Permittee shall submit a report to the Planning Division within 14 days of the wildlife surveys, notifying the Planning Division of the results of the surveys, ~~and avoidance, and species-specific list (or plan) of proper handling and passive relocation protocols~~ relocation activities.

**Timing:** Prior to the issuance of a Zoning Clearance for construction, the Permittee shall provide the signed contract with the County-approved biologist. Within 14 days of the wildlife surveys and passive relocation protocols activities, the Permittee shall provide a report describing the results.

## ADDITIONAL COMMENTS

**Mitigation and Monitoring Reporting Plan.** CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, §

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15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

**BIO-4: Monarch Butterfly Surveys and Avoidance.** The County should revise BIO-4 to incorporate the underlined language and omit language in strikethrough:

**Purpose:** To prevent impacts to monarch butterfly overwintering roosts and comply with the County's monarch butterfly protection regulations in § 8178-7.7.4 of the Ventura County Coastal Zoning Ordinance.

**Requirement:** When suitable western monarch butterfly overwintering habitat is within 1,000 feet of the development envelope, two targeted monarch butterfly overwintering surveys each conducted by a different qualified biologist shall be required for all habitat that has the characteristics of a suitable roost site (see § AE-1.3.2(g)(4)(iv) of the Ventura County Coastal Zoning Ordinance). Suitable habitat includes trees that provide shelter from storms or prevailing winds, with nearby water and nectar sources in fall/winter. If development is within 125 feet of an overwintering roost, the Permittee shall provide, for the County's, CDFW's, and the United States Fish and Wildlife Service's (USFWS) review and approval, a management plan for the preservation of the existing roost site and/or the restoration or enhancement of an historical roost site that is prepared by a qualified biologist.

**Documentation:** The Permittee shall provide to the Planning Division a Monarch Butterfly Survey Report from a County-approved biologist documenting the results of the monarch butterfly overwintering roost surveys and a management plan for avoidance of overwintering roosts in accordance with the requirements set forth in this condition (above). Along with the Survey Report, the Permittee shall provide a copy of a signed contract (financial information redacted) with a County-approved biologist responsible for the surveys, monitoring of any overwintering roosts discovered, and establishment of mandatory setback areas. The Permittee shall submit to the Planning Division, ~~and CDFW, and USFWS~~ a Mitigation Monitoring Report from a County-approved biologist following land clearing activities documenting actions taken to avoid monarch butterfly overwintering roosts and results.

**Timing:** If an initial assessment identifies potential monarch overwintering habitat within 1,000 feet of the proposed development, two surveys shall be conducted by two different qualified biologists to account for seasonal or annual differences in environmental conditions at the microsite level (e.g., wind, temperature, humidity). The first survey shall be conducted during the first half of the overwintering season (e.g., November), and the second survey shall be conducted during the second half of the season (e.g., January). The Permittee shall submit the Monarch Butterfly Survey Report that conforms to the requirements of § 8178-2.7.8, 8178-2.10.7(d) and

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Appendix E1, § AE-1.3.2(g) of the Ventura County Coastal Zoning Ordinance and the signed contract to the Planning Division, and CDFW, and USFWS prior to issuance of a zoning clearance for construction. The Permittee shall submit the Monarch Butterfly Survey Report and Management Plan to the Planning Director, and CDFW, and USFWS for review and approval prior to issuance of Zoning Clearance for construction.

**Monitoring and Reporting:** The Planning Division reviews the Survey Report and signed contract for adequacy prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the signed contract, Survey Report, and Mitigation Monitoring Report in the Project file.

## 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). The [CNDDDB website](#)<sup>3</sup> provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](#)<sup>4</sup>.

The County should ensure data collected for the preparation of the MND is properly submitted.

## 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 MND to assist the County in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the County has to our

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<sup>3</sup> <https://wildlife.ca.gov/Data/CNDDDB>

<sup>4</sup> <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>



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comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

Questions regarding this letter or further coordination should be directed to Joleena De La Fe<sup>5</sup>, Environmental Scientist.

Sincerely,

DocuSigned by:  
  
5991E19EF8094C3...  
Victoria Tang  
Environmental Program Manager  
South Coast Region

## ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife  
Victoria Tang (Environmental Program Manager)  
Jennifer Turner (CEQA Supervisor)  
Joleena De La Fe (CEQA Staff)  
Frederic (Fritz) Rieman (LSA Supervisor)  
Angela Castanon (LSA Staff)

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

## REFERENCES

California Department of Fish and Wildlife. 2025a. Lake and Streambed Alteration Program. Available from: <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

California Department of Fish and Wildlife. 2025b. Species of Special Concern. Available from: <https://wildlife.ca.gov/Conservation/SSC>

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<sup>5</sup> Phone: 858-354-3527; Email: [Joleena.delafe@wildlife.ca.gov](mailto:Joleena.delafe@wildlife.ca.gov)

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**ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)**

CDFW provides the following language to be incorporated into the MMRP for the Project.

<b>Mitigation Measure</b>	<b>Timing</b>	<b>Responsible Party</b>
<p><b>Mitigation Measure #1: Lake and Streambed Alteration (LSA) Agreement</b></p> <p>CDFW requests the Project proponent provide a hydrogeological report, which may contain a well completion report, to evaluate the effects of groundwater extraction on surface and subsurface resources. If the hydrology report shows substantial diversion from Yerba Buena Creek, the Project proponent shall notify CDFW pursuant to Fish and Game Code 1602 and obtain an LSA Agreement from CDFW. The Project proponent shall comply with the mitigation measures detailed in an LSA Agreement issued by CDFW. Please visit <a href="#">CDFW’s Lake and Streambed Alteration Program</a> webpage for more information (CDFW 2024a).</p>	<p>Prior to Project Initiation</p>	<p>Project Proponent</p>
<p><b>Recommendation #1: CEQA</b></p> <p>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 from the County for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 <i>et seq.</i> and/or under CEQA, the Project’s CEQA document should fully identify the Project’s potential impacts on stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. As such, CDFW recommends the County consider CDFW’s comments and revise the MND by incorporating the mitigation measures recommended in this letter into the Project’s environmental document. To compensate for any on- and off-site impacts to aquatic and riparian resources, additional mitigation conditioned in any LSA Agreement may include the</p>	<p>Prior to Project Initiation</p>	<p>Project Proponent/Lead Agency</p>

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Mitigation Measure	Timing	Responsible Party
<p>following: erosion and pollution control measures, avoidance of resources, protective measures for downstream resources, on- and/or off-site habitat creation, enhancement, or restoration, and/or protection, and management of mitigation lands in perpetuity.</p>		
<p><b>Mitigation Measure #2: Pre-Construction Surveys and Impact Avoidance</b> - The County should revise BIO-3 to incorporate the <u>underlined</u> language and omit language in strikethrough:</p> <p><b>Purpose:</b> To avoid significant impacts to special-status wildlife that could occur during vegetation clearing and grading.</p> <p><b>Requirement:</b> <del>Two weeks</del> <u>Three days</u> prior to the initiation of, and periodically throughout, ground disturbance activities when water is present, a County-approved qualified biologist shall conduct surveys for special-status wildlife, including western pond turtle and two-striped garter snake, to ensure that these species are not harmed. <del>Individuals of these species that are found shall be relocated to suitable undisturbed habitat, outside of the areas directly and indirectly (e.g., noise) affected by ground disturbance activities, as determined by a County-approved biologist.</del> The County-approved biologist, with a CDFW Scientific Collecting Permit, shall conduct surveys and relocation activities according to methods approved by the CDFW. <u>If a special-status species is found, the qualified biologist shall contact CDFW, and the species shall be passively ushered out of harm's way to an area that is unaffected by the Project. If the Project requires special-status species to be removed, disturbed, or otherwise handled, the qualified biologist shall prepare a species-specific list (or plan) of proper handling and passive relocation protocols. The list (or plan) of</u></p>	<p>Prior to Project Initiation/During Project Construction</p>	<p>Qualified Biologist/Lead Agency</p>

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Mitigation Measure	Timing	Responsible Party
<p><u>protocols shall be implemented during Project construction and activities/biological construction monitoring.</u></p> <p><b>Documentation:</b> The Permittee shall provide to the Planning Division a signed contract with a County-approved qualified biologist that ensures wildlife surveys, and relocation of wildlife, will be conducted within <del>14 days</del> <u>three days</u> prior to any ground disturbance activities. The Permittee shall submit a report to the Planning Division within 14 days of the wildlife surveys, notifying the Planning Division of the results of the surveys, <del>and avoidance,</del> and <u>species-specific list (or plan) of proper handling and passive relocation protocols</u> <del>relocation activities.</del></p> <p><b>Timing:</b> Prior to the issuance of a Zoning Clearance for construction, the Permittee shall provide the signed contract with the County-approved biologist. Within 14 days of the wildlife surveys and <u>passive relocation protocols</u> <del>activities,</del> the Permittee shall provide a report describing the results.</p>		