

Appendix C-4

Initial Study Biological Assessment Supplement



May 9, 2025

Adrian Breitfeld MAJCS, MBA
American Jewish University
c/o Jonathan Friedman
Jemstreet Properties
612 Lone Oak Drive
Thousand Oaks, CA 91362

Subject: Initial Study Biological Assessment (ISBA) Supplemental Letter for Expansion of Fuel Modification Zone at American Jewish University Camp Alonim, Simi Valley, California

Dear Mr. Friedman,

The American Jewish University (AJU) Camp Alonim project is located near 1101 Peppertree Lane, Simi Valley, California 93064. The Ventura County Fire Department requested that the Fuel Modification Zone (FMZ) be expanded by an additional 100 feet, resulting in a net FMZ area of 200 feet from the Camper Village and Welcome Center. Wildscape Restoration (Wildscape) wrote an Initial Biological Assessment (ISBA) for the AJU Camp Alonim project in 2022, and provided an update in 2024.

For this ISBA Supplemental Letter, Wildscape will be referencing data collected from the original site visits, surveys, and maps made between February 1, 2022-July 12, 2022, and revisits in March 2024.

Amanda Gibbs, a Ventura County qualified biologist, visited the site across multiple days, and is familiar with the site and its biological resources. This letter report discusses the history of surveying, FMZ change, an updated impact table and analysis, and an update to the mitigation measure.

Survey Area

The ISBA Survey Area typically includes the development/construction footprint, plus a buffer around the development/construction footprint. If there is an FMZ around the development/construction footprint, the buffer starts at the edge of the FMZ and extends 100 to 300 feet. The "construction footprint" is used to describe the development footprint plus the FMZ in the ISBA and in this memo. During the ISBA survey, a 300-foot Survey Area buffer was most appropriate as there were biological resources that may have been indirectly or temporarily impacted during construction, particularly the wetlands and trees onsite.

With this FMZ change, the Survey Area, which was 300 feet from the original 100-foot FMZ, is now reduced to a 200-foot Survey Area. Based on the information and data collected for the ISBA and update, it was determined that an additional biological survey is not necessary for the FMZ expansion. The plant communities within the property and beyond the Survey Area are homogenous, especially in the northern and eastern portions. The FMZ will not affect plant communities beyond the 200-foot Survey Area buffer. However, the FMZ crosses over into more of the existing mapped plant communities within the Survey Area, as discussed below.

Fuel modification is a requirement regulated by the fire department. The original ISBA discussed the impacts of the FMZ, and potential mitigation measures. Those still apply, but are expanded.

Fuel Modification Zone Impact Analysis

The new FMZ was overlaid on the previous construction footprint which included the development footprint and 100-foot FMZ shown on Figure 1. The new FMZ extended the previous FMZ by 100 feet (shown by a red line on the map). The new FMZ now creates a total of 200 feet of disturbance around the development, specifically around the cabins and the welcome center. The road/parking lot near the Welcome Center did not have a change in FMZ. The new FMZ was overlaid on the existing plant community map shown in Figure 2 below.

Establishment of an FMZ is considered a permanent impact, as brush clearance for fire prevention may be conducted within the FMZ at the property owner's discretion. The FMZ increase expanded the impacted acres of the plant communities. The updated impact acres are shown in a new column in Table 1 below. This table is an update from the plant communities table in the ISBA. While the acres of impacts have increased, they are still mitigable. Select mitigation measures from the ISBA are included in the sections below. MM1 is updated while the other measures are reiterated as they are still applicable to these new FMZ impacts.

Special Status Plants and Protected Trees Impact Analysis

A notable change will be the expanded potential impacts to the Catalina mariposa lily (*Calochortus catalinae*) population that was found to be partially overlapping the outer limit of the first FMZ. With this boundary shift, the Catalina mariposa lilies will now be fully within the FMZ, although they mainly occur beyond the first 100 feet of the FMZ. The mitigation measures in the ISBA called for protection measures to reduce the impacts to the community of Catalina mariposa lily plants. The same mitigation measures shall be followed. The ecological community impacts will remain potentially significant but mitigable. See mitigation measure for the Catalina mariposa lily (MM1) and the creation of a Fuel Modification Plan (MM2) below:

MM1 (Revised): Catalina Mariposa Lily (*Calochortus catalinae*) Protection Plan and/or Restoration Plan

Purpose:

Protection of Catalina mariposa lily plants and habitat within and adjacent to the cabin development Construction Footprint.

Requirement:

A qualified biologist shall conduct spring botanical surveys (March – May) prior to the start of ground-disturbing activities to map the extent of aboveground plants within the Construction Footprint. Based on the overlap of Project activities, the biologist will create a protection plan to prevent Project impacts to the lilies. If impacts cannot be avoided, a restoration plan to mitigate project impacts will be required.

- Based on the extent of Catalina mariposa lilies observed in 2022, the population may exist completely outside of the Project's grading footprint but, with the FMZ expansion, now exists completely inside the fuel modification zone. Recommended measures to avoid impacts to the lily population on site include installing protective fencing around the observed extent of aboveground lilies plus a buffer of additional potential suitable habitat. Permanent fencing or barriers are recommended to prevent longer term impacts of increased human foot traffic to and from the proposed cabin development, as well as shorter term impacts of construction activities.

- The lily populations on-site fall within the 200-foot fuel modification zone of the proposed cabins, but all are outside of the first 50 feet and the majority are outside of the first 100 feet. To minimize impacts of required brush clearance activities, the Protection Plan should include recommendations to leave patches of Catalina mariposa lilies within a fuel mosaic zone (see MM2 - Fuel Modification Plan).

If permanent impacts to the Catalina mariposa lily population cannot be avoided, a Special Status Plant Species Restoration Plan (in ISBA) will be required. The plan will include compensation for the loss of individual plants and associated habitat through on-site mitigation and or participation in a mitigation bank. The plan shall include required mitigation ratios, quantitative success criteria and a monitoring and reporting schedule. The plan should also include an adaptive management program and contingency measures for mitigation success if transplanting and/or propagating Catalina mariposa lilies on-site proves difficult and ultimately unsuccessful.

Documentation:

The county shall include this measure as part of the proposed project.

Timing:

A qualified biologist shall survey for Catalina mariposa lily in the spring (March – May) prior to the initiation of ground disturbing activities to re-confirm the extent of the population and flag the areas for protective fencing.

The Protection and/or Restoration Plan should be approved by the County prior to the start of Project activities.

Pre-construction surveys and any necessary relocation of plants or bulbs should occur 3 to 7 days before clearing, grubbing, and grading activities occur.

Monitoring and Reporting:

The biologist will conduct spring surveys and record locations of specimens. A biological monitor will be present when plants or bulbs are transplanted and will map where they are relocated. Site monitoring during subsequent springs will be necessary to determine progress of any on-site mitigation areas.

Table 1. Impact Table

Map Key (1)	SVC Alliance	SVC Association	Misc. (2)	Status (3)	Condition (4)	Acres Total	Previous Acres Impacted ^a	Updated Acres Impacted	Comments (5)
PCo1	California Annual Grassland/Herbaceous Alliance	Black Mustard-Ripgut Brome Herbaceous Association		-	Disturbed	8.55	3.29	5.25	Grazing and mowing for brush clearance
PCo2	<i>Quercus agrifolia</i> Woodland Alliance	<i>Quercus agrifolia</i> /Annual Grass-Herb Woodland/ Forest Association		-	Disturbed	4.86	0.01	0.21	The trees are surrounding the existing cabin development
PCo3	<i>Quercus agrifolia</i> Woodland Alliance	<i>Quercus agrifolia</i> / Annual Grass-Herb Woodland/ Forest Association		-	Intact	0.71	0		Up the slope from the cabin development; no disturbance, no hiking
PCo4	California Sycamore Woodland/Forest Alliance	<i>Platanus Racemosa</i> / <i>Quercus agrifolia</i> South Coast Woodland/ Forest Association		G3S3	Disturbed	3.85	0.36	1.35	These trees are surrounded by the existing roads, playground, and development
PCo5	Coast Live Oak Woodland/Forest Alliance	<i>Quercus agrifolia</i> / Annual Grass-Herb Woodland/Forest Association			Disturbed	2.12	0.61	1.66	Trees and herbaceous understory located north of proposed Welcome Center, near existing Garden.
PCo6	Coast Live Oak Woodland/Forest Alliance	<i>Quercus agrifolia</i> / <i>Quercus berberidifolia</i> Woodland/ Forest Association		G3S3	Disturbed	0.39	0.25	0.39	Disturbed by the development, likely planted with ornamentals
PCo7	<i>Artemisia californica</i> - <i>Salvia leucophylla</i> Shrubland Alliance	California Sagebrush - Purple Sage Shrubland Association		G4S4	Intact	0.49	0		Small intact patch surrounded by disturbed area
PCo8	<i>Quercus berberidifolia</i> Shrubland Alliance	Scrub Oak Shrubland Association		G4S4	Intact	0.35	0		Small intact patch surrounded by disturbed area
PCo9	<i>Artemisia californica</i> Shrubland Alliance	California Sagebrush Shrubland Association		G4S4	Intact	0.26	0.22	0.26	Small intact patch surrounded by disturbed area
PC10	<i>Salvia leucophylla</i> Shrubland Alliance	Purple Sage Shrubland Association		G4S4	Intact	0.09	0	0.03	Small intact patch surrounded by disturbed area
PC11	California Annual Grassland/Herbaceous Alliance	<i>Brassica nigra</i> – <i>Centaurea melitensis</i> Herbaceous Association			Disturbed	13.22	0.66	3.22	Cattle grazing pasture
PC12			Urban/ Disturbed or Built-Up			10.89	3.56	6.02	Existing buildings and vacant areas around buildings

Table 1. Impact Table (continued)

Map Key (1)	SVC Alliance	SVC Association	Misc. (2)	Status (3)	Condition (4)	Acres Total	Acres Impacted ^a		Comments (5)
PC13			Urban/ Disturbed or Built-Up			0.72	0	0.3	This area was developed into a garden
PC14			Undifferentiated Exotic Vegetation			2.44	0.76	2.01	Trees planted in the landscaped areas; mostly non-native trees
PC15			Cleared Land			0.75	0.32	0.43	Existing dirt roads.
PC16			Undifferentiated Ornamental Shrubland			0.40	0.22	0.28	Shrubs planted in the landscaped areas around the buildings in planters; some may be native, but the intention was for landscaping
					LIC Locally Important Plant Community ESHA Environmentally Sensitive Habitat Areas (Coastal Zone) CDFG Rare: G1 or S1 Critically Imperiled Globally or Subnationally (state) G2 or S2 Imperiled Globally or Subnationally (state) G3 or S3 Vulnerable to extirpation or extinction Globally or Subnationally (state) Cal OWA Protected by the California Oak Woodlands Act ^a Total acres impacted for all Plant Communities (10.26 acre) is slightly greater than the estimated Construction Footprint (10.15 acre); the slightly higher acreage is used to assess and discuss potential Project impacts to species and communities.				

MM2: Fuel Modification Plan

Purpose:

Minimize potential impacts of vegetation trimming and clearing to special-status species or communities occurring within the Fuel Modification Zones.

Requirement:

The Project proponent shall develop and implement a Fuel Modification Plan for Fuel Modification Zones resulting from new development. The Plan should describe measures to meet the Ventura County Fire Protection District guideline 418 for Defensible Space while reducing impacts to special-status plants, animals, and/or communities.

- The plan should include the establishment of fuel mosaic zones, where patches of Catalina mariposa lilies, native milkweed (*Asclepias* spp.), and other important native plant species can be left undisturbed during routine vegetation maintenance activities and brush clearance events.
- The plan should include the requirement of nesting bird surveys prior to brush clearance and other vegetation maintenance within new Fuel Modification Zones, if conducted during the nesting bird season, as defined by CDFW. If active bird nests are observed, maintenance activities will be delayed, or buffers will be established according to the guidelines described in MM10 - Nesting Bird Avoidance, Survey, and Protection Plan (from the ISBA, not included in this memo).

Documentation:

The County shall include this measure as part of the proposed Project.

Timing:

The Final Fuel Modification Plan shall be submitted to and approved by the County prior to ground disturbance.

A qualified biologist shall complete required nesting bird surveys within three days prior to scheduled fuel modification activities during the nesting bird season.

Protected Trees

As previously designed, the Project will result in the removal of 67 surveyed trees, 12 of which are protected under the County of Ventura Tree Protection Ordinance. One protected California sycamore (*Platanus racemosa*), eight protected coast live oaks (*Quercus agrifolia*), and three non-native heritage trees will be removed. Project activities may encroach upon an additional 17 protected California sycamores, 17 protected coast live oaks, one scrub oak, one non-native cork oak, and six non-native heritage trees.

With the change in the FMZ, a total of 275 trees are now within the construction footprint. While protected native trees in the FMZ may not require removal, tree removal will occur at the discretion of the fire department, particularly for the trees in the Coast Live Oak Woodland/Forest Alliances (PCo4, PCo5 and PCo6) that are now in the FMZ.

An updated analysis of the number of trees to be removed, encroached, impacted was not calculated at this time. The updated and accurate number of trees shall be included in the MM3 Protected Tree Mitigation and Protection Plan below to provide an accurate total number of trees to be replanted for mitigation. Subject to VCFD approval of the Final Fuel Modification Plan, the Protected Tree Mitigation and Protection Plan shall be revised.

Project and cumulative impacts to protected trees may be significant without appropriate mitigation.

MM3: Protected Tree Mitigation and Protection Plan

Purpose:

- To compensate for the removal of protected trees, to minimize adverse impacts of development/construction activities encroaching within the Tree Protection Zone (TPZ) of protected trees, and to prevent inadvertent or indirect impacts to trees outside of but adjacent to the Development Footprint.
- The plan will indicate locations (original and new after FMZ change) of trees to be removed, trees that will be encroached upon, and trees outside of but adjacent to the Development Footprint that require protective fencing to prevent inadvertent impacts.
- The plan shall also include trees that will need to be pruned for fire clearance, and an annual pruning schedule to comply with the fire department's requirements.
- The plan will also indicate which trees will be transplanted and designated transplant and replacement planting locations for on-site mitigation.

Requirement:

The County of Ventura Tree Protection Ordinance, Sec. 8107-25.10, requires the replacement of lost trees on a cross-sectional area basis. Stantec's arborist report (2022), describes other potential mitigation measures for the trees planned to be removed.

Documentation:

The County shall include this measure as part of the proposed project.

Timing:

Protective fencing must be installed before construction and approved by an arborist.

Monitoring and Reporting:

Trees transplanted or replaced with new plantings will need to be monitored.

Wetlands Impact Analysis

Prior to the FMZ expansion, 0.30 acre of riparian habitat fell within the fuel modification zone. The new 200-foot FMZ encompasses both sides of the jurisdictional wetland area. With this update, the fuel modification zone now impacts approximately 1.35 total acres of riparian habitat, classified as PC04 California Sycamore Woodland/Forest Alliance under CDFW jurisdiction. A 0.26-acre portion of this riparian habitat also falls under the jurisdiction of USACE, as shown in Figure 3. Approximately 0.06 acre of the riparian habitat occurs within the Development Footprint of the Welcome Center/Parking Area, this area was not affected by the FMZ changes.

In accordance with the Ventura County 2040 General Plan Implementation Policy, compensatory mitigation is required to offset the impact of ground-disturbing construction activities within 0.06 acre of the riparian zone of East Tributary Meier Canyon. On-site restoration and enhancement of portions of the riparian zone adjacent to the area of impact at a 1:1 mitigation ratio is recommended. Additional compensatory mitigation may not be required for the 1.35 acres of riparian habitat which falls within the Project Fuel Modification Zone due to the highly disturbed condition and current management of this area. Intact riparian vegetation along the stream is sparse and the area borders a dirt road, parking area, and small play area. The understory of the mature California sycamores in the riparian zone bordering the proposed Welcome Center and Parking area has already been impacted by landscaping and fuel modification activities. Any additional impacts of required fuel modification for the new development within this area are expected to be less than significant.

After consultation with CDFW they recommended submitting a formal Notification process for a Streambed Alteration Agreement. CDFW may recommend or require additional measures to mitigate potential impacts to the streambed and adjacent vegetation. If these measures include compensatory mitigation for impacts related to fuel modification within 0.30 acre of the riparian zone, mitigation at the ratio set by CDFW will be included in a Habitat Restoration and/or Replacement Plan (MM15 shown below).

MM15: Development and Implementation of a Habitat Restoration and/or Replacement Plan

Purpose:

To offset the loss of riparian habitat, and other native plant communities, due to development and fuel modification within the riparian zone of East Tributary Meier Canyon. In addition, the FMZ will potentially impact the California Sagebrush Shrubland Alliance and Purple Sage Shrubland Alliance due to brush clearance for fuel modification.

Requirement:

The project proponent shall provide restoration and/or replacement habitat as compensatory mitigation such that no overall net loss of riparian habitat results from the development. The restoration and/or replacement habitat shall be 'in kind' (i.e., same type and acreage) and provide habitat of comparable biological value. On-site restoration and enhancement of riparian habitat adjacent to the impacted area is recommended at a 1:1 ratio.

The project proponent will develop a 5-year Habitat Restoration and/or Replacement Plan in consultation with all agencies that have jurisdiction over the resource. Components of the Plan shall include but are not limited to the locations and acreages of compensatory mitigation sites, habitat restoration and enhancement activities, mitigation success criteria, and a monitoring schedule.

Documentation:

The County shall include this measure as part of the proposed project.

Timing:

The Habitat Restoration and/or Replacement Plan should be submitted to and approved by the County and any other agencies with jurisdiction over the resource prior to issuance of a grading permit.

Monitoring and Reporting:

Monitoring of the mitigation site shall be conducted at least annually for five years following initial mitigation implementation to track progress of the site towards established success criteria and adjust maintenance activities accordingly. Annual monitoring reports shall be submitted to all agencies that have jurisdiction over the resource.

Thank you for selecting us to provide this ISBA Supplemental Letter. If you have any questions or concerns, please contact me at agibbs@wildscaperestoration.com or call the office at 805-535-4448.

Sincerely,
Wildscape Restoration



Amanda Gibbs
Chief Business Development Officer

Appendix A: Figures

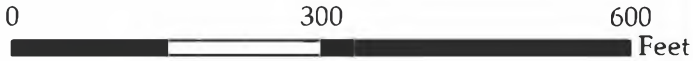


CAMP ALONIM IMPROVEMENTS Site and Survey Map

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Legend

-  SA1 - Survey Area
-  Construction Footprint (Including original 100ft buffer)
-  200-ft FMZ (100 feet from Original FMZ, totaling 200 from development)

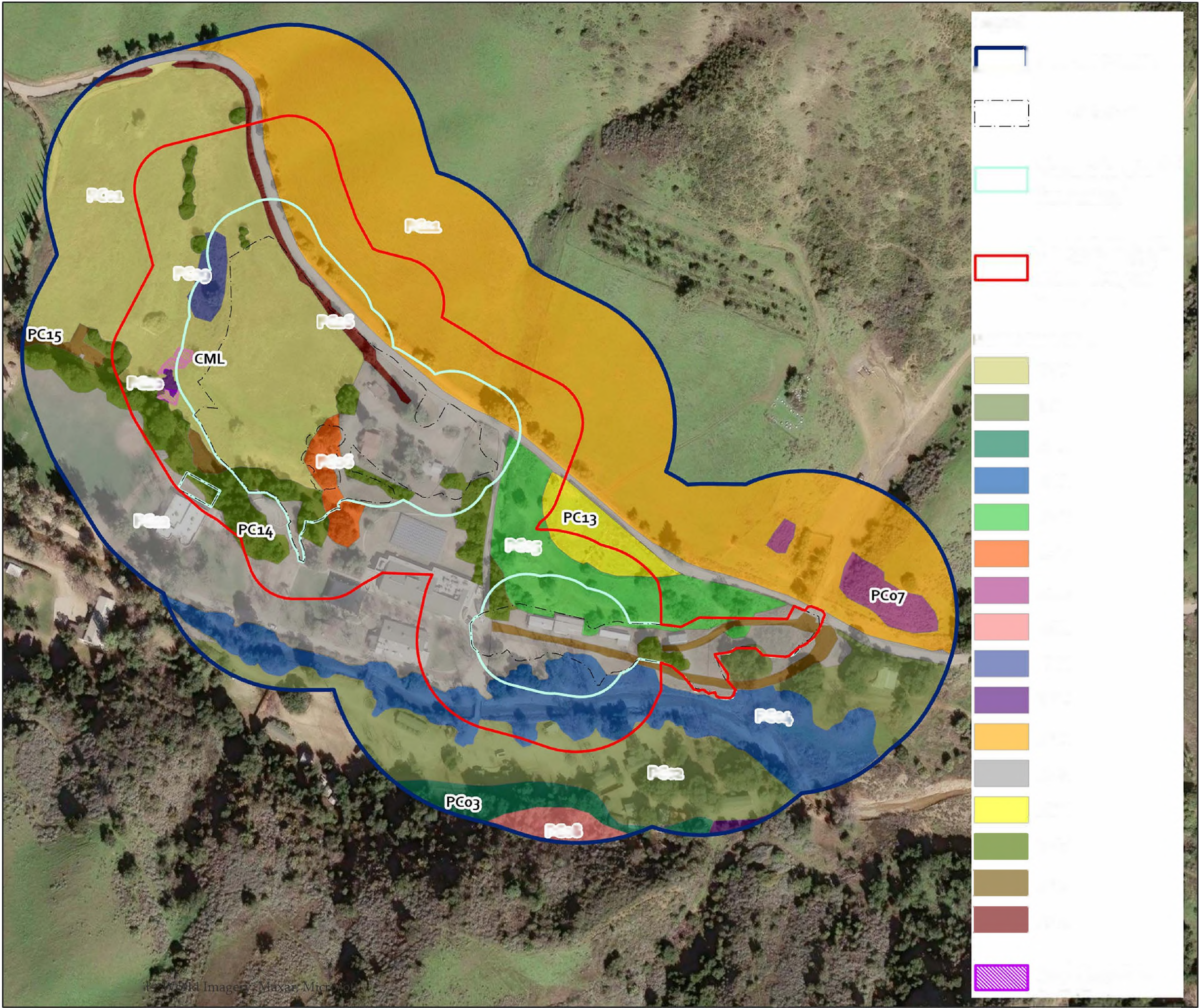


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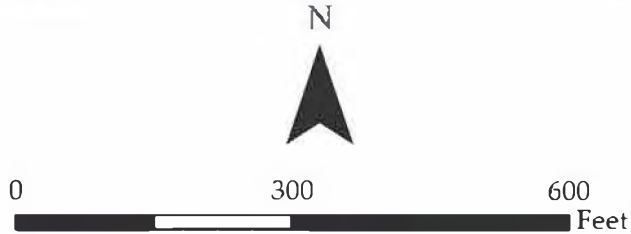
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CAMP ALONIM IMPROVEMENTS Plant Communities Map

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Code	Map Key
PCo1	California Annual Grassland/ Herbaceous Alliance
PCo2	<i>Quercus agrifolia</i> Woodland Alliance
PCo3	<i>Quercus agrifolia</i> Woodland Alliance
PCo4	California Sycamore Woodland/Forest Alliance
PCo5	Coast Live Oak Woodland/Forest Alliance
PCo6	Coast Live Oak Woodland/Forest Alliance
PCo7	<i>Artemisia californica</i> - <i>Salvia leucophylla</i> Shrubland Alliance
PCo8	<i>Quercus berberidifolia</i> Shrubland Alliance
PCo9	<i>Artemisia californica</i> Shrubland Alliance
PC10	<i>Salvia leucophylla</i> Shrubland Alliance
PC11	California Annual Grassland/ Herbaceous Alliance
PC12	Urban/ Disturbed or Built-Up
PC13	Urban/ Disturbed or Built-Up
PC14	Undifferentiated Exotic Vegetation
PC15	Cleared Land
PC16	Undifferentiated Ornamental Shrubland



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CAMP ALONIM
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Waters and Wetlands Map
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Legend

- SA1 - Survey Area
- Area Disturbed
- Construction Footprint
- 200-ft FMZ (100 feet from Original FMZ, totaling 200 from development)
- VCWPD Redline Stream
- W1 Ephemeral Stream Buffer (50 ft)
- W1 Ephemeral Stream Buffer (25 ft)
- W1 Jurisdictional Waters
 - CDFW
 - USACE



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